

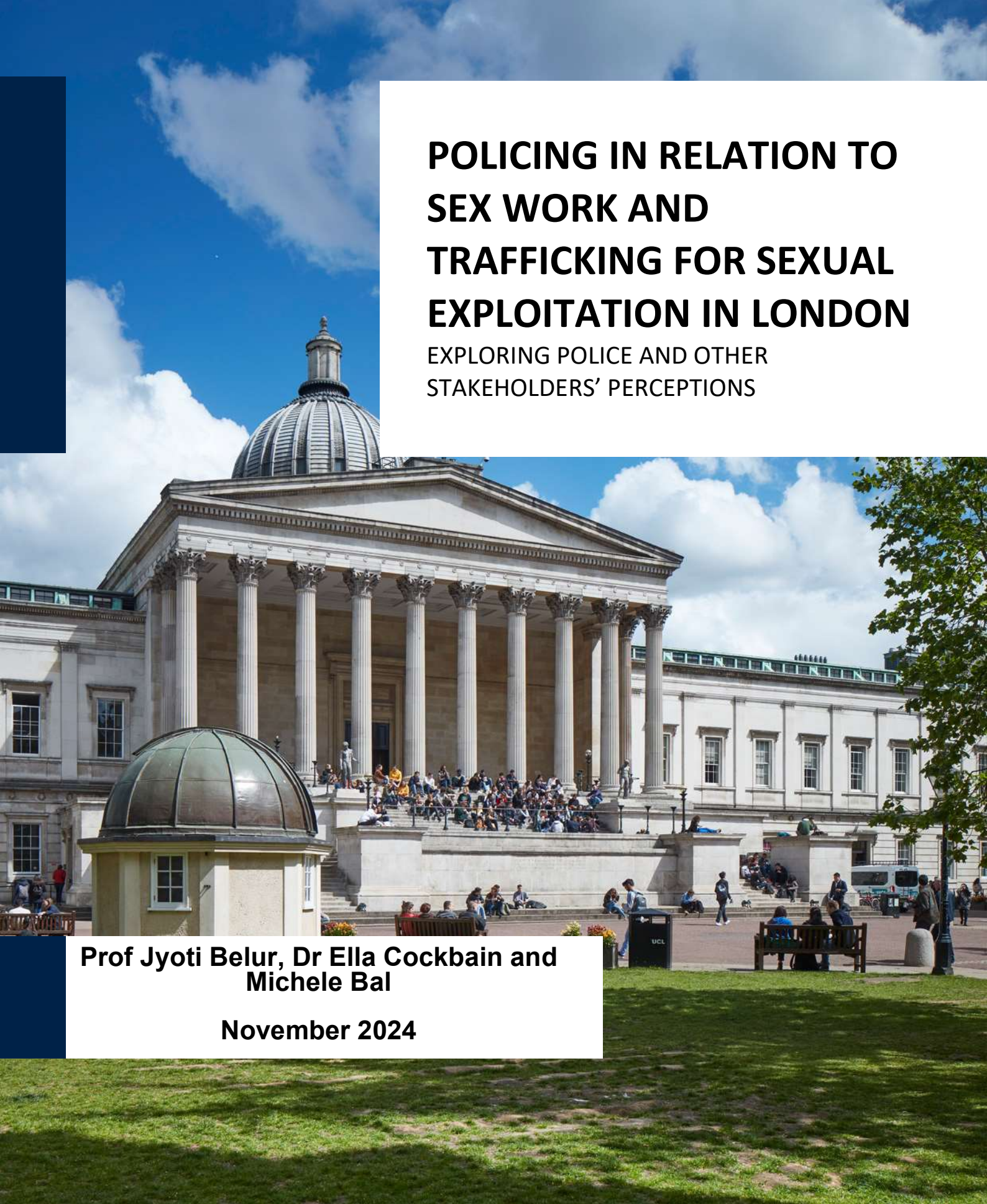


## **POLICING IN RELATION TO SEX WORK AND TRAFFICKING FOR SEXUAL EXPLOITATION IN LONDON**

EXPLORING POLICE AND OTHER  
STAKEHOLDERS' PERCEPTIONS

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## Executive Summary

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This research report explores the landscape of sex work in London and how policing in relation to sex work and trafficking for sexual exploitation is perceived by key stakeholders inside and outside of policing. The research project was commissioned by the Metropolitan Police Service (MPS) to support them in developing evidence-based strategies for policing in relation to sex work and trafficking of adults for sexual exploitation in London (also known as *Operation Evergreen*).

### Objectives

The study was designed to:

1. Understand how police perceive the nature of sex work, their own role, what works in terms of policing with respect to sex work in London, and how their views compare with those of non-policing stakeholders.
2. Assess perceptions of policing in London in relation to sex work (and sex workers), identifying perceived effectiveness of current strategies and tactics, tensions and their limitations, and areas for improvement.

### Methods

The research was conducted through qualitative semi-structured interviews with 24 police officers and 18 key stakeholders from outside policing. The officers represented various units, including frontline, strategic, and specialised teams. Non-policing stakeholders included representatives from sex worker led organisations, healthcare, and NGOs working closely with sex workers and trafficking victims/survivors. Sex work is a broad umbrella, and our project focused on full-service commercial sex.

### Key Findings from Police Interviews

#### 1. Perceptions of Sex Work:

- Police officers perceived the landscape of sex work in London as diverse, involving street-based sex work, brothels, and increasing use of online platforms to facilitate offline services. That said, their understanding of the workers involved was narrow: police participants generally saw street based and brothel work as divided equally between migrant women (generally described as from Eastern Europe, China, Brazil and/or South Asia) and local British (mainly white) cis-women, who were mostly described as struggling with problematic drug use. Cis-male and trans and/or non-binary workers were largely absent in police accounts.
- Officers expressed mixed attitudes about sex work, acknowledging a spectrum of choice and coercion in sex work but rarely if ever seeing it as a 'legitimate' choice. While some viewed sex workers as exercising autonomy, others focused on exploitation and victimhood, particularly

in the context of problematic drug use and human trafficking. Police often focused on what they were convinced was organised crime involvement driving sex work.

## **2. Policing Approaches:**

- Historically, the MPS focused on enforcement against sex workers, including arresting sex workers and shutting down brothels, but this approach was reportedly now largely viewed as being ineffective and counterproductive by interviewees.
- The current focus seems to have shifted toward targeting clients and those exploiting or controlling sex workers, rather than sex workers themselves.
- Police responses highlighted the lack of specific data on the size of the sex work market and the finances involved. Many made off-the-cuff estimates of the amount of money involved, seeing large figures as proof of organised crime involvement without firmer evidence to support these assumptions.
- Police said that trust in the police is very important, particularly since they believe safeguarding is a key priority with respect to groups they described as vulnerable, such as migrant sex workers and those with problematic drug use.
- Officers expressed concerns that any enforcement activity would adversely impact on sex workers' trust in the police.

## **3. Challenges in Policing:**

- Interviews indicated a lack of clear 'ownership' of sex work or a sex work policy to guide practice at the local or strategic levels in the MPS.
- Officers reported challenges in gathering reliable data on sex work. The lack of actionable intelligence reportedly hampers their ability to respond effectively.
- Some officers highlighted encountering tensions between responding to community complaints about brothels and sex work while trying to build and maintain relationships of trust with sex workers.
- Partnership work with stakeholders was considered useful for instrumental reasons, but lack of trust from partners and sex workers in the police and inconsistency of efforts to maintain partner relationships by the police were seen as barriers.
- Overall, participants indicated that policing in relation to sex work is neither a political or organisational priority, nor is it a key performance indicator, consequently, it receives little attention.

## **Key Findings from Non-policing Stakeholders' Perspectives:**

Key themes include:

1. **Intersectionality:** Non-policing stakeholders highlighted how overlapping identities of sex workers (e.g., in terms of race, class, migration status, sex/gender) can add layer upon layer of stigma and together shape sex workers' experiences and expectations of policing. Recognising

intersectionality was therefore seen as crucial in addressing policing-related issues in this space.

2. **Widespread Fear and Mistrust:** Fear and mistrust of the police (and other state agencies to which they connect) was widely cited as a major barrier for sex workers in seeking help from police. These issues were often described particularly pronounced for those with multiply-marginalised identities, who were said to be at higher risk of discrimination, criminalisation and other punitive actions from the police and state.
3. **Inconsistency and Unpredictability in Policing:** Participants pointed to a pronounced lack of consistency in policing practices in relation to sex work/ers, with responses reportedly varying significantly across areas, officers, teams, and timeframes. This inconsistency was seen in large part as an inherent consequence of vague and expansive laws around sex work. It was also said to make it challenging for sex workers to know what to expect, enable abuses of power and discretion, and further increase mistrust and reduce reporting of victimisation.
4. **Positive Aspects of Policing:** Experiences were often mixed (including from negative to vaguely neutral at best for many from sex worker organisations). That said, some participants appreciated partnership efforts, specific support units, single points of contact (widely seen as a key priority for improving responses) and cases where police focused on helping sex workers who were victims of crime rather than penalising them. Discussions of what constituted positives often indicated a very low bar.
5. **Harmful Police Practices:** Actions such as police 'welfare checks' and brothel raids were widely criticised for causing psychological, physical and economic harms to sex workers. Many of those we spoke to, viewed these practices as inherently harmful and/or counterproductive, as they can push sex workers into riskier situations. As such responses framed as 'safeguarding' were often seen to make sex workers more vulnerable not less. There were also particular concerns about how law enforcement and immigration enforcement intersect.
6. **Policing-Related Harms:** Participants reported a combination of both systemic/structural harms within policing (and society at large) and explicit interpersonal harms caused by police officers, including direct physical and sexual violence, theft, discrimination and other misconduct. Participants in sex worker organisations, in particular, indicated that police and violent clients were often seen as on a par in terms of the risks and harms associated (and that police could themselves be violent clients).
7. **Alternative Approaches:** Many participants advocated for the police to do less but to do it better, focusing on instances where they can provide real support to sex workers as victims of crime while leaving welfare functions to non-policing agencies. Criminalisation of sex workers, including on sex work-related offences and other charges, was widely seen as counter-productive and there were calls to minimise pathways into the criminal justice system.
8. **Systemic and Legal Reform:** Non-policing participants were often very clear about the limits to potential improvements within current systems. Calls for changes to laws and policies were aimed at reducing policing-related harms and improving the overall safety and rights of sex workers, including through

decriminalisation of sex work and improving social safety nets so that people had more options.

### **Recommendations**

The findings from this report call for a shift toward an approach that minimises criminalisation of sex workers and third parties while enforcing more effectively when people in the sex industry report crimes such as rape, theft, trafficking and so forth., Our results also suggest a need for enhanced training (while recognising the limits to training alone), more accountability about policing strategies and their impacts, and a more consistent, respectful policing approach that centres victims of crime and their needs. There is a clear case for a harm-reduction approach to sex work that does not treat sex work itself as a harm but seeks to minimise harms associated with it, including those that are a direct result of policing. The report offers numerous recommendations for improving the MPS's approach to sex work. Detailed recommendations from each strand of the project can be found in the respective chapters (Chapters 2 and 3). Building on those, our overarching recommendations are as follows:

- **Goal Clarity:** The MPS senior leadership team should be clear in prioritising goals, focused on harm reduction, that they would like to achieve, resolve some of the tensions involved in achieving conflicting goals, and prioritise resources accordingly.
- **Strategic Direction:** The MPS should have a clear vision and strategic direction in the form of establishing local 'ownership and responsibility', and supporting organisational structures to enable partnership work, improve transparency and accountability, and improve domain specific education and training.
- **Policy Reforms:** Renew efforts to introduce policy and legal reform by incorporating sex workers and sex worker organisations at the heart of the change process.

### **Conclusion**

The research highlights the complexities of policing in relation to sex work and sex trafficking in London and spotlights areas of tension and disagreement between the perspectives of police officers and other stakeholders on several aspects of policing – especially with respect to what the police think their role in this space is and how they perform it and how differently the police role is perceived by and negatively impacts upon the experiences of sex workers.

While there are clear areas of improvement, particularly in building trust and focusing on safeguarding, the MPS lacks a coherent strategy at the organisational and local level to guide practice in this landscape. Current strategies show a concerning shift to targeting the demand side of sex work by focusing on clients and an overwhelming interest in harm reduction which was seen by the police as mainly disrupting organised crime involvement in sex work (without recognition of the need to minimise harms associated with policing itself). We suggest ongoing collaboration with key stakeholders, particularly sex workers themselves, should be the keystone of an effective, fair, and compassionate response to sex work and sex workers.

# Chapter 1: Introduction and context

This research project was commissioned by the Metropolitan Police Service (hereafter MPS), to support Operation Evergreen: which was introduced in 2021 as the MPS' strategic response to sex work and trafficking of adults for sexual exploitation in London. The specific aim for this research was to build the evidence base to help develop and improve the MPS strategic and operational response to sex work in London. To achieve this aim, we delivered against two key objectives:

3. To understand how police perceive the nature of sex work, their own role, what works in terms of policing with respect to sex work in London, and how their views compare with those of non-policing stakeholders.
4. To assess perceptions of policing in London in relation to sex work (and sex workers), identifying perceived effectiveness of current strategies and tactics, tensions and their limitations, and areas for improvement.

The project addresses sex work involving adults only (i.e. it does not cover commercial child sexual exploitation) and is focused on full service commercial sex, be it on street, in brothels, or at other off-street premises. We approached this study with a pragmatic orientation and interests in harm reduction (i.e. prioritising sex workers' safety, but not treating sex work itself as a harm). For concision and in recognition of the preferences of sex workers' rights' advocates in the UK and internationally, we use the term 'sex work' throughout, unless we are specifically and exclusively talking about the extremes of criminalised exploitation in which case we refer to trafficking/'modern slavery'. We avoid the term 'prostitution' unless in direct citations or discussing specific legislation, because of the additional stigma associated with it.

## Context

Sex work is a broad and varied phenomenon, that spans numerous different types of activity, from full-service sex work to camming, chat work, stripping, domme work and so forth. The MPS was particularly interested, broadly speaking, in sex work that takes place on the street, in private properties, and online (as a way of arranging offline activity). Street sex work is the most obvious and stigmatised manifestation of the sex industry and is probably the most likely to be perceived as a public nuisance (Sanders & Laing, 2018a). It often involves some of the most marginalised people (e.g. people who are homeless and/or use drugs). In contrast, sex work in private properties can be much more varied in nature, including stripping, relatively well-paid, secure, and independent 'escort' type services, and lower-paid brothel type work (including so-called 'pop up brothels', which have attracted particular concern in recent years from an anti-trafficking perspective). Finally, the digital space is increasingly recognised as an important location for recruitment, advertising, organising and service provision



(Cunningham et al., 2018) but is comparatively poorly understood, including in the London context. The boundaries between online and offline sex work can thus, rapidly blur in practice.

Sex work is also a complex and contested topic, subject to intense, long-standing and polarising debate around whether and to what extent it is inherently exploitative (see, e.g. Platt et al., 2018; Sanders & Laing, 2018b). In contrast, there is a broad consensus that sex work is stigmatised, carries particular risks and dangers and that sex workers themselves often (although not necessarily) belong to various and oftentimes intersecting marginalised populations (e.g. LGBTQ+ people, migrants and those on low income) (see, e.g., Platt et al., 2018). We approach this project from a pragmatic perspective with a particular interest in harm-reduction. We recognise that sex work may be the best option for some, the 'least worst' for others, and fully exploitative for others yet. Empirical evidence suggests that sexual labour, like much work in general, can occur on a 'constantly shifting spectrum of choice, circumstance, and coercion' (Albright & D'Adamo, 2017: p.123; see also Smith & Mac, 2018).

In the context of increased prioritisation of violence against women and girls (VAWG) and human trafficking or so-called 'modern slavery' in the UK, the police face challenging decisions on how best to respond to crimes involving sex work and sex workers, be it as victims, witnesses, or offenders. The broader landscape of an increasingly hostile environment around irregular migration further complicates the situation. Although selling sex is itself legal in England, many activities associated with it are criminalised (e.g. soliciting in a public place, kerb crawling, brothel keeping). Policing responses to sex work in the UK – as indeed elsewhere in the world - have often been fraught and fragmented and there is an unfortunate and ongoing record of police violence (be it direct or indirect) against sex workers (see, e.g., Elmes et al., 2021; ECP, 2024; ESWA, 2024; Sanders & Laing, 2018b; Smith & Mac, 2018). There is clearly an acute need to improve policing responses and build trust, which is why it was encouraging to see the MPS invest in this research to support Operation Evergreen.

This research offers a much-needed opportunity to better understand the police's response to sex work in London from the perspectives of both police and non-policing stakeholders and inform future strategic and tactical work in this space. In many ways, sex work is an unusually challenging area to police (Sanders & Laing, 2018a), not least because of the acute complexities in terms policing crimes against and by sex workers, as also those involving sex workers as witnesses. Additionally, it is essential that hidden vulnerabilities and exploitation are addressed in a way that avoids further stigmatising and disadvantaging an already marginalised population. Our project focused specifically on adults selling sex (over 18s), as there is a very different legal, policy and practice landscape where child sexual exploitation is concerned.

## Research Design

In keeping with the exploratory nature of this project, the research is qualitative in design. Central to the project are semi-structured interviews, selected to give the space and freedom to explore complex issues with depth and nuance, while still maintaining a focus on key topic areas of relevance and importance to the project's aims. Interviews were conducted with police officers and other key stakeholders from organisations working with sex workers and/or victims of trafficking. Our aim was to elicit their perceptions on a various topics covered by the research questions below:

1. How do police officers perceive the nature and extent of sex work in London, and how do their views compare to those of other key stakeholders?
2. How do police officers and other key stakeholders from outside policing perceive current policing responses to sex work and sex workers in London?

In answering these questions, we sought to identify how views and experiences compared and varied within and outside of policing, how effective current strategies and tactics were perceived to be, what tensions and issues existed in responses, what the limits to knowledge were, and what were seen as important areas for change and improvement. We also used these findings to inform tangible recommendations for changes to try and ensure policing responses 'work' more effectively, by which we primarily mean in terms of enhancing sex workers' safety and preventing/reducing/responding to exploitation and violence.

While we have a sizeable sample for a qualitative project and a rich dataset, the aim with qualitative research is not to produce generalizable findings or comment on the prevalence of particular views or experiences. Instead, the strength of qualitative enquiry lies in the ability to examine complex issues with nuance, depth and texture. Although our study is London-specific, many findings resonate with the international evidence-base and have relevant lessons for elsewhere. As with any interview-based research, there is the potential for self-report bias.

## Ethics

The project was given low risk approval by the Research Ethics Committee of the Department of Security and Crime Science at UCL (reference 481). The ethics process and main considerations for each strand of the research are detailed in the respective chapters, as they differed between the two strands.

## Report structure

The remainder of the report is structured as follows. Next, Chapter 2 focuses on our interviews with police officers. This is followed by Chapter 3 on interviews with non-police stakeholders. Finally, Chapter 4 presents a discussion of our overall findings and their implications, including recommendations for next steps.

# Chapter 2: Interviews with police officers

## Introduction

This chapter presents findings from interviews with police officers, including both frontline and mid-ranking to senior police officers. All were active in London: most working in the MPS, and some individuals from the City of London Police and MOPAC. It explores their perceptions of the landscape of sex work and trafficking of adults for sexual exploitation in London and the challenges involved in engaging with sex work communities, which have historically had (and indeed, still have) an uneasy relationship with the police. The interviews elicit their perspectives to address the two key objectives of this strand of the research:

- Exploring how police officers perceive the landscape of sex work in London from a strategic and operational standpoint, and
- Eliciting police perspectives on the organisation and effectiveness of police responses to sex work and sex workers.

## Methods

This strand of the research involved in-depth semi structured interviews with relevant police officers and staff (such as SNTs, supervisory officers, and senior leadership team) who are currently involved in frontline policing in strategic and operational capacities. The interviews were conducted by the first author (Prof Jyoti Belur). The sampling was undertaken in partnership with the officers from Operation Evergreen, although the interviews were conducted independently by the first author. Sampling was purposive and included officers of various ranks from different geographic areas of the city, representing Safer Neighbourhood Teams and Public Protection Units along with officers from the Modern Slavery Unit, Intelligence Units, Operation Evergreen Advisors<sup>1</sup> and officers from the core Operation Evergreen team. The aim was to elicit a range of opinions from officers with varied responsibilities and experiences in relation to the sex work and trafficking for sexual exploitation fields. An introductory email with a letter of invitation was sent to identified officers by the lead officer of Operation Evergreen with a request to participate in the research. Officers who agreed to participate were then contacted by the research team and sent an information sheet and a request to provide a signed consent form ahead of the interview. Interviews were conducted by the first author online via Microsoft Teams

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<sup>1</sup> These were officers nominated from each Borough to be Operation Evergreen ‘champions’, whose role, among other things, was to raise awareness and encourage flagging of crime reports involving sex workers (in any capacity) in order to get a comprehensive picture of the landscape of reported sex worker associations with crime incidents (either as victim, perpetrator or witness).

and were recorded and transcribed with the permission of the officers. In total, 24 officers took part, in interviews ranging from 45 to 80 minutes.

Participants include 9 female officers and 15 male officers, with a range of experience from 3 to 28 years, and working in different parts of the city including North, Central Specialist Crime, Operation Evergreen, Frontline Policing Headquarters, MOPAC and City of London police. Interviews lasted typically for just over an hour and most participants seemed engaged and interested in the topics under discussion. Demographic details of the participants in order of rank are included in Table 1<sup>2</sup>.

**Table 1: Demographic details of police interviewees**

| No. | Rank                 | Gender | Years of experience |
|-----|----------------------|--------|---------------------|
| 1   | Superintendent       | M      | 22                  |
| 2   | Superintendent       | F      | 8                   |
| 3   | Det. Chief Inspector | M      | 19                  |
| 4   | Det. Chief Inspector | M      | 23                  |
| 5   | Det. Chief Inspector | M      | 27                  |
| 6   | Chief Inspector      | M      | 18                  |
| 7   | Inspector            | M      | 27                  |
| 8   | Det. Sergeant        | F      | 20                  |
| 9   | Det. Sergeant        | F      | 33                  |
| 10  | Sergeant             | M      | 28                  |
| 11  | Sergeant             | F      | 20                  |
| 12  | Sergeant             | M      | 10                  |
| 13  | Sergeant             | F      | 14                  |
| 14  | Sergeant             | M      | 15                  |
| 15  | MOPAC                | F      | NA                  |
| 16  | Det Constable        | M      | 30                  |
| 17  | Constable            | F      | 21                  |
| 18  | Constable            | F      | 20                  |
| 19  | Constable            | M      | 7                   |
| 20  | Constable            | M      | 20                  |
| 21  | Constable            | M      | 2                   |
| 22  | Constable            | M      | 3.5                 |
| 23  | Constable            | M      | 3                   |
| 24  | Constable            | F      | 2.5                 |

Interviews were analysed using the NVivo software. Broad themes relevant to the research questions were identified and initially coded into sub-themes. The deconstructed data was then re-configured to provide a narrative framework to present the findings.

<sup>2</sup> These serial numbers **do not correspond** to participant identifiers in reporting results later in this chapter.

Ethical approval to conduct the research was given by the UCL's Department of Security and Crime Science's Ethics Committee (reference 481) as well as the MPS Ethics committee. Participants were assured of anonymity and that we would do our utmost to uphold confidentiality, for which reasons most references to areas or organisations are removed. Unique codes PO1 to PO24 were assigned to participants for consistent attribution of quotes.

Limitations include the absence of participants from the Intelligence units in the MPS, which makes it difficult to understand or comment on the current status of what and how intelligence in the area of sex work is gathered, collated, and used operationally at the local level and in a more joined up way across London and adjoining areas.

## Findings

Although the officers were identified by the team at Operation Evergreen, it is interesting to note that apart from a few select officers working in this area, most of the interviewees were not specifically conversant with the landscape of sex work or, by their own admission, knowledgeable about the MPS's strategic or operational response to sex work. Officers' opinions seemed to span the gamut of responses, not all of them depicting the police in a positive light, alleviating to some extent concerns about the sample being biased in some way.

Findings are presented in answer to the overarching research questions. Themes identified in relation to the first research question 'how did the police perceive the landscape of sex work?' were:

- Perceptions of sex work
- Perceptions of street sex work and sex workers
- Perceptions of brothel sex workers
- Perceptions of cis male and trans sex workers
- Perceptions of exploitation of sex workers

Further, themes identified under the second research question, were divided into the two parts of the question. Answering the first part of the question 'what do the police perceive to be their role, revealed the following themes:

- Enforcement that was client focused, controller focused, and sex worker focused.
- Safeguarding
- Building trust and confidence
- Intelligence gathering
- Illustrative case of brothel visits

Themes identified in the second part of the question 'what do police officers think 'works'? were:

- ‘Ownership’ of sex work
- Incorporating response to sex work under violence against women and girls (VAWG).
- Local and strategic MPS policy
- Partnership work with outreach and other stakeholder agencies
- Challenges to and suggestions for improving police response.

Finally, the chapter provides a set of recommendations based on the analysis of interviews with police officers.

## **How did the police perceive the landscape of sex work in London?**

Officers were asked about their perception of the existing landscape of sex work in London. Most officers chose to explain this in terms of their professional experience and exposure to sex work in their job. Unsurprisingly participants focused mainly on their understanding of the street and brothel sex work landscape.

Ten of the 14 officers with more than 15 years of work experience largely shared a similar perception of how the landscape of sex work has evolved in London, as this officer described,

“Originally when I, like, first started working in it, there was probably a lot more on-street prostitution. That was kind of areas that were very synonymous with that, like Kings Cross, but a lot of work was put into those areas. There is still an on-street prostitution element. But it's probably nowhere near as big as it was then, and it certainly concentrated in just some patches without throughout London...I think there's been far bigger influx in the last, you know, 13 years of certainly more European sex workers, but then definitely more now and we see more and more Brazilian, Chinese and..., a lot more transsexual sex workers now as well in London that we see” (PO4).

Another officer added that,

“The sex work problem has increased. It is getting worse, because not only does it bring in sex workers, it brings in ASB [anti-social behaviour], it brings all different kind of crime types” (PO9).

The interviewee went on to attribute the rise in the quantum of the ‘problem’ to the rise in “cost of living” and “desperation”. Another officer added that sex work was “fuelled by addiction...housing, unemployment” (PO9).

Officers interviewed were aware that the nature and amount of sex work was changing rapidly, especially with the introduction of online facilities as well as the fact that most of the advertising is now internet based. One officer said,

“My sense is since I last worked in this space, which was this ten years ago now...things have moved significantly more online with the use of certain websites via video... I think an awful lot more of it has moved online, which makes it slightly harder to police and a lot harder to check in terms of the well-being of those that are involved in that type of work.” (PO5).

Another interviewee added that, in the absence of hard data, they could only anecdotally say,

“I feel like the pandemic has also pushed prostitution more online and in people’s homes or inside anyway. So, it is not as on the street as it was before the pandemic and before Brexit” (PO6)

Overall, many officers felt that “the demographic just mirrors the demographic of the population” (PO18) and given the immense variation in the demographic make-up of London, interviewees’ perceptions also varied considerably depending on the areas they worked in. Interview data indicated that officers conceptualised sex workers in terms of binaries - distinguishing between those who worked on the street and in brothels; those who had ‘addictions’ (as they termed it) or not; white vs other ethnicities; British vs migrant workers, younger vs older workers; and those who were independent vs controlled. And yet, many of these categories intersected making the picture quite complex, especially when ethnicity and immigration status intersected with vulnerabilities such as problematic drug use, exploitation, and involvement in (other) criminality.

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## **Perceptions of sex work**

Officers’ attitudes towards sex work ranged along a continuum, with some officers being open to accepting that there are independent sex workers who are exercising autonomy in their decision-making and there are others who are coerced into it. For example, one officer explained,

“We've got to have a very neutral view on sex work. We're not coming in saying that that sex workers should exit, it is recognising that there's a spectrum where there's either agency or not and there's harm or there isn't. It's free choice...and we shouldn't sit in judgment over any of this. We just got to make sure that there is a proportionate and sensitive response and that our colleagues ...they don't go in and stigmatise or completely, miss what's taking place? Because that's the other thing. It's easy to do nothing about it.” (PO13)

Even though the officer talked about a spectrum, nevertheless, the use of binaries to describe this spectrum perhaps implies that the notion of spectrum is accepted but officers continue to think in terms of extreme ends of the ‘spectrum’, be that with respect to choice or harm. Other officers seemed to acknowledge that there might be free choice involved but seemed more concerned about possible transgressions such

as ASB or 'drug peddling' and the 'nuisance' associated with sex work for the community, as explained by this participant,

"I personally have no issue with sex working, I think prostitution is the oldest profession in the world. And if that's what people want to do and there's a market for it, I have no issue with them doing it. The issue that I have is the danger and the risk that it brings to them and to other people and the antisocial behaviour that comes with it to the other people that live in that street. You know that that have people knocking at their doors because they've got the wrong door or you know, the amount of rubbish that accumulates outside. And the drugs that come with it as well, so that they're the two main ones for me, street prostitution and brothels, I would say." (PO15)

Some officers questioned whether agency and consent were or indeed could really be involved in sex workers' decisions to work in this space,

"I think they [sex workers] think it's a lifestyle choice. I don't deny that they probably do think it's a lifestyle choice because they've chosen it, even though they probably haven't...I think especially with the class A girls, it is probably a lifestyle choice. I think that it's sad, but it's probably the only way they see a way to make money to be able to buy their drugs... but it's so difficult for us to show them [sex workers] that it isn't, "You haven't chosen this. You've been manipulated into thinking that you have to do this" It's called the 'lover boy' method where they'll just turn around and basically pimp them out" (PO19).

It was ironic that, despite apparent good intentions, the officer did not realise that their attitude seemed patronising and dismissive of challenges faced. The officer also had their own interpretation of what agency meant and were keen on trying to get sex workers to see that what they (sex workers) think is agency, is nothing else but 'manipulation' by another name. It seemed to be the case that despite what most officers conceded about agency in choosing sex work, there always seemed to be an underlying sense that they believed that no one would choose to work in this area willingly or if they could avoid it and they were quite exit-focused in their attitude. An extreme version of this opinion was expressed by this officer,

"I don't think there's a woman out there that would actively choose that this is what you desperately want to do every day as a job. I really don't and there's reasons why they choose to do it. And from the extreme of being completely forced and trafficked and beaten to perhaps having been a single mum and having no money and needing to feed your children and earn a living. So, there's varying degrees as to why women choose or are forced or find themselves in that situation. But like I want to police that and work within that field because I think there's so many awful, vulnerable situations that you find within it that you just wanna do anything you can to help those people that want to be helped to get out of it" (PO4).



The officer went on to add that the reality of sex work is not pleasant and was convinced that no one would willingly choose to work here,

“I don't think I ever speak to anyone that says I absolutely love this. ...Most of them say to me it's disgusting. I absolutely hate it. And the real kind of like gross side of it is the reality of men come in, you know, 10-15 men a day and you know, you have to perform oral sex or have sex with no condoms are used and you get sexually transmitted diseases and you get beaten. That's the reality of it, is absolutely vile. So most of them don't want to be there doing that. Uh, some of them are stuck there” (PO4).

However, not all officers agreed, those with more experience of working with sex workers conceded that,

“There is naivete, cynicism and trauma. I think a lot of policemen are traumatised and then it comes to this - either wanting to immediately help this helpless sex worker because no one chooses to go into sex work, I mean the amount of times I've heard that no one chooses to go into sex [work]. No one wakes up in the morning and thinks ‘I wanna be a sex worker’. Actually, they do, and it happens” (PO22).

It was also clear that none of the officers presented a more nuanced understanding that agency or consent ranges along a continuum from complete agency at one end to total subjugation and exploitation at the other end but rarely talked about positions in-between. The notion that at times an individual may be exercising agency, and at others the same person might feel forced or trapped, was not really articulated. There seemed to be a conception that sex workers were either one thing or the other and once officers had assigned them a category, it was rarely reviewed.

Moving from the personal to the professional view on sex work, officers were mainly concerned about the impact street and off-street (particularly brothel-based?) sex work has on local communities and neighbourhoods. It seemed as if some officers were focused on finding situational ‘solutions’ in terms of moving the ‘problem’ onto another area, as one senior officer commented,

“So, for the community officers, I would say that they probably see them [sex workers] as a bit of a pain because they know that the community don't like them [sex workers] being on their doorstep. And they [officers] know that they [sex workers] are actually quite difficult to, you know, to dispel to, to move and without just displacing it to next door, which is also part of my borough, you know. And it's like, actually, there's no point in me doing something. I'm moving it from here to here because I'm just going to get a different set of disgruntled community members” (PO15).

However, some officers did understand that the issue had wider structural and social implications and the response had to be more than mere displacement, but would

also include working with other stakeholder agencies, including outreach - which we will discuss later,

“Yes, it's a problem, but it's a shared problem for the community that we need to work together on. We shouldn't just move the problem on. So that's the balance that we have. So, from a senior leadership perspective, it is about understanding the narrative” (PO2).

Participants were asked how they thought the MPS, as an organisation, addressed sex work. From officers' responses it seemed as if they believed that although previously there might have been stigma and discrimination associated with sex work, but in recent years some attempts at education and initiatives like violence against women and girls (VAWG – more about that later) had increased awareness and empathy.

“[There is] Massive misunderstanding of sex work. They don't really see it as a bigger picture... I think there's a lot of judgment involved when it comes to individual officers' actions. Umm, I dread to think of the language that's used. And I think, you know, there's a lot of cops that need a lot of education about sex work” (PO22).

Another officer said,

“I you know, I think it just varies so much like you come into our unit and most people feel really quite passionate and strongly about doing all you can to help them. Certainly, they [sex workers] are viewed as victims or as potential victims. And whereas, sadly, you might go on to local policing and I don't wanna speak wrongly of any of them. Maybe through inexperience or lack of training or lack of understanding, they [sex workers] are not necessarily treated with all the dignity that they deserve... It varies, and some of it's brilliant, some of it is not so bad, and sadly, other responses aren't great.” (PO4)

However, since the MPS has invested in Operation Evergreen and brought sex work under the VAWG umbrella, some officers believed that there was investment in trying to change the perception and stigma that surrounds sex work within policing.

“So, the Metropolitan Police has engaged with violence against women and girls and other sort of really important pieces of like work or initiatives, it has increased the understanding. As a result of that increased understanding, there is definitely more empathy and compassion around that [sex work] and less judgmental as well.” (PO24)

Some of this was borne out by interviewees, especially those who were working closely with Operation Evergreen, who claimed that their awareness and

understanding of the sex work landscape had improved after their engagement with Operation Evergreen. We will look at the impact of Operation Evergreen in detail later in the report.

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## **Perceptions of on-street sex work and sex workers**

There was a common perception that most street workers were either people with problematic class A drug use (said to be mainly local English white women) or migrant sex workers (said to be mainly Eastern European women). Typical of this view, was one officer's claim that, "In my experience it is a pretty even split, probably 50-50" (PO19).

Another officer said that in his local area,

"A lot of the street sex workers will be either from Chinese heritage or possibly Indian background where they get brought over here and I'm pretty sure I get the idea that they get promised a better life here" (PO11).

But this characterisation was not uniform across different areas, for example, another officer when asked about how sex workers in their area were split between street and off street sex work in terms of ethnicity said,

"Street workers, I think 70% are British, probably British born...A majority white, uh and then probably African Caribbean and South Asian." (PO22)

Officers automatically placed a strong emphasis on ethnicity and heritage of sex workers when characterising or categorising them – perhaps because it had implications for why they thought they 'had to' be a sex worker (e.g. because of needing money for drugs); or perhaps because they suspected that overseas workers, especially in brothels, were trafficked or being controlled in some way. Given the complexity of the landscape, we surmise that officers used simple shorthand rules or stereotypes to make sense of it all.

Perception of the nationality and ethnicity of those who used class A drugs differed. For example, one officer felt "I'll be honest with you, probably 95% are white" (PO22), meaning they were white British born, an opinion shared by another officer,

"The street workers are English...the prostitutes are all mainly English [ meaning they were white British born]. The ones that are uh, on the street, they are all obviously very heavy class A drug users..." (PO10)

However, others expressed different views on the proportion of street sex workers who were white British or Eastern European. In some parts of London women of other ethnicities were also involved, according to this officer, who said that 60% of street sex workers in his area were of Bengali or black African origin, but he did not know for sure whether they were British citizens,

“I don’t know. I don’t think any of them that I’ve known that we’ve come across, because you always do a check of them. None of them have come back as sort of illegal immigrants. Not to say that...no, I don’t know the answer to that one” (PO12).

The role of immigration was a contentious one that we will discuss in response to the second research question.

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### **Perceptions of brothel-based sex work**

Off street sex workers in any given area on the other hand, were according to most of the interviewees, immigrant women, often sharing a similar heritage, which included but not restricted to Eastern European (PO7, PO15), Brazilian (PO10), Chinese, Indian, middle Eastern, Romanian, Bulgarian (PO11), Bengali, black African (PO12), Eastern European, South American (PO13), depending upon the area of London they were familiar with. In one officer’s words,

“The toms [sex workers] in the brothels are all, tend to be from other countries...I think they were Brazilian, because they were all speaking Portuguese because we had an interpreter with us as well...They are all foreigners, a lot of the time, you’ll go along and try and deal with them and they’re like ‘Me speaking not English’” (PO10)

Another officer said,

“But brothels, from what I gather, I don’t know, there is a lot of English in brothels, however there is also pockets of Brazilian, Chinese and South Asians. There’s pockets of Eastern European”. (PO22).

The distinction between how one officer perceived the difference between white British born sex workers with problematic drug use who worked on the streets and the migrant brothel workers was quite stark. He described the former as follows,

“very heavy class A drug users ... don’t really care about their appearance, yeah, don’t really look after themselves. Just hanging out with the wrong people really and often can be involved in other kinds of crime as well. Just basically to support their drug habit” (PO10)

The same officer went on to describe the appearance of some Brazilian sex workers he had encountered and said,

“I was quite surprised that the girls in the brothels were quite uh, well-kept and well-groomed. Quite made up, quite attractive women that you wouldn’t think were doing that kind of thing. I suppose. Like a higher class of whatever you want to call them” (PO10).

Only two officers mentioned coming across British sex workers in brothels. One officer said,

“I do a lot of brothel visits, a couple every single week and it’s very, very rare I come across a [native] British sex worker. They might be kind of British, that is they have got a British passport now, but like they’re not raised British. They have been, they have come from perhaps Romania and now they have got settled status here or something like that...But I can’t remember the last time I came across a British [native] sex worker” (PO3).

The officer explained that she thought perhaps this was because British workers had either moved away from sex work or moved on to online sex work because,

“...there’s other ways to kind of make money through that kind of sexual industry, isn’t there, rather than just working in a brothel? Maybe things like Only Fans and even just webcam chats and that sort of stuff is probably boomed more that they perhaps have taken up that role more” (PO3).

In contrast another officer said,

“The majority of sex work is carried out by UK women. And migrant women are definitely a percentage, but I wouldn’t say they were the majority. From what I know and without having hard statistics, I would say that it is mostly UK women who are in that” (PO6).

However, it was not clear whether the interviewee was speaking specifically about on-street or off-street sex workers. This was an issue with many interviewees, who would begin by responding to a specific question about street sex work, for example, but quickly would begin generalising about their experience more broadly with both off- and on-street sex work.

The key issue is a lack of statistics about the number and composition of sex workers in the various contexts of sex work that either the officers or we know of. Thus, all these perceptions have to be understood as resulting from individual officers’ experiences – which were varied. Only in two areas with dedicated officers in neighbourhood teams did officers seem to have a clear idea of how many street workers operated in their beats. On the other hand, almost none of the officers were able to estimate the number of brothels that might be operating in either their areas or across London. Only one officer tried to give some kind of rough estimate,

“Brothels, oh, there’s, you’ve got well, like, I couldn’t even put a number on it, I don’t know. There’s loads of them, there’s hundreds of brothels. There’s going to be at least a hundred brothels in (*borough name withheld for confidentiality*). So, if you take that to every other borough in London, you know, there’s 32 boroughs. So, on you say average 3,000, just over 3,000 brothels.” (PO20)

Another officer said,

“I’ll be honest, the amount of brothels, like even just in this area is crazy because I’m a brothel SPOC [single point of contact], so any new brothel that is identified as a brothel or if there is intelligence coming in it comes to me...And, yes, there is probably a new brothel coming in once a week and, yes, it’s ridiculous how many active brothels there are and how we just get new brothels every day” (PO21).

From the interviews it became apparent that in the experience of officers rarely would there be a mix of either ethnicities or even cis male and trans and/or non-binary sex workers along with cis female sex workers in the same premise. “Do we get a mix? You might get a mix of one or two ethnicities and nationalities, but you don’t get a potpourri if you like” (PO22). Another officer said,

“I don’t recall ever going into a brothel and finding them [cis male and trans sex workers]...I am not saying it is not there...maybe, I don’t really know. We just do not come across it much at all, certainly never mixed within [cis] females in a brothel” (PO4).

Thus, there was a mixed picture of how officers perceived the nature and composition of off street (principally brothel-based) sex workers. That again underscored the point that the industry was (perceived to be) configured differently in different areas of the city. Overall, the picture of sex work across London was impressionistic, anecdotal, and rather ambiguous.

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## **Perceptions of cis male and trans sex workers**

When asked whether they thought there was an increase in the number of (cis) male and/or trans and/or non-binary sex workers, almost all officers replied that although they were aware that there must be cis male and trans sex workers, over three quarters of them had not actually come across any. The common refrain was encapsulated in this officer’s response,

“Personally, the only sex workers I have come across have been females. I haven’t come across any male or trans sex workers...I don’t doubt they are there, I’ve not come across any” (PO1).

Another officer admitted that “I don’t know the proportions, but what I do know is that it is a hidden world... it has always been there, but has it increased? I doubt it” (PO13).

Whether an officer was likely to encounter cis male and trans/non-binary sex workers might also be dependent on the geographic part of the city that they were working in, as one officer said,

“I imagine they are out there, but again it will come down to the area in which you police. In terms of location, in some areas [*names withheld for confidentiality*] they are more likely to be assaulted if they were doing that, because of, I don’t know, the bigotry from the community. They would attack them because they just don’t get it, don’t understand it. Whereas you move to a more liberal area, then [you’re] probably more likely to find it” (PO9)

It was interesting to note that officers who did acknowledge the existence of trans sex workers tended to emphasise that they were mainly foreign national sex workers, one officer said,

“There are many more trans sex workers who are living and working in London. It is perceived to be a safe place. There is a very large, let us say, group of Brazilian trans sex workers who are not able to live openly in Brazil for lots of different reasons. But they will come here, live here, and work here primarily to get money to put towards any gender reassignment surgery” (PO17).

It was not clear whether this officer was speaking from hearsay or whether it was something they had come across during their work. Similarly, another officer mentioned they had been informed of transnational (mainly Brazilian) sex workers who were in London to fund their reassignment surgery (PO22).

Although some officers acknowledged that there must be cis male and trans sex workers in brothels, generally the opinion was,

“There’s not many areas where you will find male escorts or else street based male sex workers...but there are still a number of male brothels which have been around and which will always be there from a trans perspective” (PO17).

It was interesting to note that only two officers mentioned coming across cis male and trans sex workers during a brothel visit,

“All our brothels are either female or transsexual. And I think in my time I’ve only ever been to an address where there has been a male and a transsexual worker in one address” (PO3).

“I’ve never come across any [cis male or trans sex workers] on the street, but definitely in brothels. You’ll go to a brothel where it is all transsexual. I have been to a brothel where there might be a transsexual within the brothel with other female sex workers, but generally they kind of work together” (PO4)

Less than a quarter of the officers interviewed mentioned the existence of escort services and other web-based (i.e. happening purely online) sex services. One officer said,

“Sex work itself is very, you know, a broad range of things, you know, sex work can range from anything from on-street sex work to working in brothels, to pornography, to strip clubs, to cam girls, anything from the range can be within

escorting, sugar babies, things like that, that can all be part of sex work. So, sex work is kind of a broader, more PC [politically correct] term for describing the entire industry” (PO20)

Again, there was acceptance that the police knew very little about the numbers or indeed any information about how these might be organised or the size of the transactions involved. Officers believed that there might be some estimates in the intelligence units, but none of the officers interviewed had access to that information.

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### **Perceptions of exploitation of sex workers**

Both street and off-street sex workers were mainly considered to be exploited or controlled in some way. Officers felt that those with problematic class A drug use might be working independently to “feed their habit” (PO17) or be controlled by their boyfriends or suppliers.

“I think with the class A addicts, they might have boyfriends that are also addicted and they force them as well, they beat them if they don’t. And I know for a fact that happens, obviously they don’t come forward and tell us that, but you do see them with random men sometimes, class A users, and you can just tell they might be scared, they might be forced by them” (PO21).

“The class A girls would be exploited in a different way...they might have a drug dealer making them go out and work. It is a bit of a different relationship there because the drug dealer is not exploiting them emotionally, more psychologically instead” (PO19).

Some officers felt that migrant street workers were, more often than not, ‘tricked’ into coming to the UK with promises of better prospects and were exploited by “pimps” who were either their boyfriends or husbands. One officer explained what form of exploitation they thought was involved,

“So in the sense that they’re trafficked they’re brought into the country expecting to be given this life of fortune in London, They’ve probably met whoever their pimp in Romania or Bulgaria. Probably acted as a boyfriend, came over and were told ‘Look I have this amazing life in London, you can come over’. They come to London and they are being told to work in a café or to work on the street. That is your sort of textbook exploitation” (PO19).

On the one hand, there was recognition from some participants that perhaps for the individual the returns from sex work might benefit the sex worker and her family, there were undertones of judgement, in that one officer considered the work to involve lowering of standards and of sacrifice. This officer said,

“It’s a messy trade, but in their countries it is not seen as a messy trade and of course the residual benefit of what they do is their families have amazing lives.



And again, you've gotta respect that in some ways that they are willing to sacrifice their own standards, their own lifestyle to give back to their families." (PO2)

On the other, there was a firm conviction among many officers that sex workers were being controlled by individuals or organised crime groups, as this officer said, "I definitely see the more organised crime element coming in from Eastern European gangs, especially in this area" (PO20).

Additionally, one officer acknowledged that migrant sex workers might be trapped into sex work because they are not allowed to get regular employment.

"Brazilian and Chinese nationals might come here on a tourist visa and stuff, and you know they find themselves in sex work. They can't go and get a job in a restaurant as a waitress or, cleaning, which they would be more than happy to do. But they are not actually allowed, so they are stuck doing this because there is no other way for them to earn the money" (PO5).

Officers were asked whether they thought trafficking intersected with sex work and every interviewee felt that it definitely had a role in sex work, but very few had a clear idea of the extent of involvement. Responses were quite vague,

"I think there is probably a lot of it that goes on...I think especially in, well, mainly in brothels. I think that's probably what is going on behind the scenes" (P10).

"A huge amount I imagine. Not speaking from any particular position of expertise but yeah, I think this is a lot of crossover in that people are specifically trafficked for the purposes of sex work...a high proportion of the bricks and mortar kind of brothel type premises...anecdotally this is just my impression" (PO23).

Only two officers mentioned internal or domestic trafficking within the UK as well, in contrast to most of them who immediately spoke of overseas or migrant women being trafficked into the UK for sexual exploitation purposes. "I've seen it from all sorts of countries...there will be internal trafficking as well" (PO16)

Four officers were convinced that most migrant, especially Eastern European, women who claimed they were working independently were actually trafficked but said they either denied it or did not realise that they were being exploited/trafficked, or did not perhaps trust police officers enough to admit to being trafficked. This line of reasoning is illustrated below,

"I think everybody knows they are trafficked, except for them, which makes it difficult...So we all know they are trafficked. The public probably know they are trafficked, especially crime teams probably know they are trafficking, but the problem with trafficking is that you need to have the victim on board because they'll turn around and say, 'Yes, I've come over because he is my boyfriend.

He's going to give me work, I love him'...the threshold of proof is so high for trafficking, you need the victim to be on board with it...sometimes I feel like maybe previous teams have destroyed that trust because these girls who have been arrested by previous teams, they think we are out to arrest them" (PO19)

Another officer added,

"I think it's [trafficking] far greater than a lot of people think probably...and even though they may be part of that choice to come here and know what they're coming to do, I still think I still see that as absolutely, that's still trafficking, because they're preyed upon for their vulnerabilities or their lack of money, or their lack of education. ...someone else might look at that and think, well, they knew what they were coming to do, how is that trafficking? But I completely disagree with that" (PO4)

Only one officer cautioned that although human trafficking might be involved perhaps the extent of trafficking was less than what the police imagined it to be,

"I think that we as the police assume too much that girls are trafficked into it. From my experience of having worked in this area for a long time, there are quite a few females who are doing this very voluntarily. Absolutely their choice, you know, never been trafficked into it" (PO15)

The same officer went on to narrate an anecdote about a sex worker they had encountered who had paid for her five children's private schooling through sex work and had claimed that she would have paid tax if she could, like any other professional. The officer went on to say,

"I think when we go into a brothel, we nowadays automatically assume that the girls in there are trafficked and are a victim of trafficking. And I would suggest they aren't always" (PO15)

The officer had several years of experience working in the sex work area and seemed attuned to its nuances. Ultimately, we feel that the difference of opinion stemmed from whether a police officer believed that anyone could and indeed would willingly choose to be a sex worker. Since most of them did not, it naturally led to the conclusion that sex workers must have been forced into it and the resulting exploitation therefore counted as trafficking. This is not to deny that there is no element of trafficking or coercion in the area, but it is perhaps overestimated, as interviews with non-policing stakeholders indicate (see Chapter 3).

One officer linked the involvement of trafficking to organised crime with these words,

"...like drugs and other things people have essentially unfortunately become a commodity, which people make money out of, particularly with the migrant situation, and the entire trafficking and exploitation situation. So yes, and of course, whenever there's big money, which people then are worth, there's also

a lot of organisation that goes into facilitating that type of crime to make that sort of money. So instantly it hits that serious and organised crime threshold” (PO5).

This opinion was held by nearly all officers interviewed. The overall reasoning underpinning this conclusion could be summarised in this officer’s words,

“I think human trafficking and organised crime go hand in hand. They are similar, so it feels like it's the domino effect. It all leads down that same path. So, you know, organised gangs, human trafficking into sex work for me... it's the natural flow. It just you know, that's the domino effect. It just links into that kind of same path, same route.” (PO14).

The logic seemed to be that since a lot of money was involved in the brothel business, it has to be controlled by someone, required to be laundered and therefore it was natural that organised crime was involved, as illustrated below.

“We know there are organised criminal networks who bring people into the UK. You know, we're looking at Romanian networks, Eastern European networks..., they organise the transfer of those individuals from Europe into the UK... because there's money to be made there. And very often it's the sort of networking that isn't very obvious, isn't apparent, and maybe the police aren't very effective or no complaints by the neighbours. It just goes very much under the radar and you wouldn't know about it. There's a whole world of drugs exploitation, whole world of criminality, with the organised networks who are around sex work. We know that. And they do exist” (PO17).

One officer ventured to estimate the amount of organised-crime-controlled brothel work that might exist in London,

“I think it's probably about 30%. Because I think, uh, industrial brothels are kind of controlled brothels, and our street sex workers make up, yeah, probably less than 30% of the entire sex work landscape” (PO22)

It, however, was not clear what was the source of this estimate because almost no one we spoke to seemed to have the information required to form a clear picture of the extent of sex work, let alone, involvement of trafficking and organised crime elements. Even though officers extrapolated from what information they did have to arrive at some numbers, there is no way to confirm whether this could be accurate. For example, one officer said,

“You know, it's incredibly difficult to sort out regarding the organisation as in organised crime, absolutely. Even if the girls want to be there, and they're paying 50% to the house. So, when you actually work it out, if it's a five bedroom house, you've got five girls working there all night. They charge anywhere from sort of 80 to 120 pound per session. They might go for 10 to 15 clients each, so you're talking about a grand and a half. Five grand you know,

five to six grand per night for all the girls. Half of that money will go to the house. That's three grand a day or night, seven days a week. That's 21 grand a week. When you're talking about £80,000 a month, very quickly, you know, you're up to almost £1,000,000 for a house for one brothel. That that's a lot of money...the girls and men [sex workers and clients] aren't committing an offence per se. But the men, they're your people running the brothel, we haven't done the work to try and link, if different brothels are linked and that takes time, investigation, and there isn't that want or drive to do that at the moment" (PO7).

Given that earlier another officer had estimated that there might be at least 3000 brothels in London, the amounts involved, by officers' estimations can get quite staggering, even if they concede that over half of the brothels might be independent sex workers working together without any 'control', as this interviewee explained,

"We may have a few independent sex workers, but my personal opinion is it's linked to organised crime... it does exist, that there's additional crime types within that... We just need to go looking for it. If we look for it, we'll find it quite easily" (PO8).

The refrain of not having either the resources or expertise to investigate brothels at the local frontline officer level was mentioned by four officers, something that we will return to later.

"We see adverts and you can Google it and you can see it is so blatant, but we don't have the expertise and the knowledge to tackle that next level. We would like to, but we can't, with the SNT [Safer Neighbourhood Team], its remit is so massive. if you wanna look at the brothel element, we're only scratching the surface. So, I would just be picking that one when I know I've got another 28. But I can only tackle this one and it's gonna take me two years to deal with the problem" (PO9).

## **What do the police perceive to be their role and what do they think 'works'?**

Officers were asked what they thought the role of the police was with respect to sex work and a number of themes emerged. Those ranged from the very welfare-oriented approach of this officer,

"From my point of view I am trying to get it changed to welfare from more enforcement. I want to be checking on the welfare of sex workers. I want to make sure that they are not trafficked across, that they are doing everything of their own free will, and whether there is anything I can do to assist them" (PO1).

to being very enforcement focused, as this officer mentioned,

“So it’s more action against the clients buying off sex workers. Definitely, not the sex workers themselves. And I do see a lot of brothels being shut down, you know, complaints from the community” (PO14)

Disentangling the myriad aims mentioned by officers, we categorise them as enforcement; safeguarding; service to victims; developing intelligence; and building trust and confidence in the police. Our findings indicated, however, that these aims are closely intertwined in ways that can enhance or work contradictorily as we shall examine.

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## **Enforcement**

This aim was not quite as unambiguous as one would expect, because when asked if enforcement was an aim of policing, one officer’s answer showed a nuanced understanding of the term,

“It means we don’t ignore things. It means we are looking at the root issue, whether it is sex litter, whether it’s communities who are offended by things happening in their back gardens, whether it is vulnerability around people being brought into sexual exploitation, it is policing. It is making sure that we are removing that risk and vulnerability and addressing them and not ignoring things. (PO16).

Officers mentioned that in previous years, the focus in policing was on getting sex workers off the street or removed from brothels. The result of this aim was explained by one officer,

“I think the arresting of sex workers and letting them straight out on bail is a pointless exercise...But, you know with brothels, when we close a brothel down, I’ve literally seen neighbours jump up in the air with joy that it has now been closed because of the amount of hassle that it brings to them, their children, and their communities...I genuinely don’t know what the answer is. I feel like I have spent a good few years of my life doing exactly this, you know, arresting sex workers, bringing them in, arresting curb crawlers, arresting the blokes who put up cards in the telephone boxes. And, actually I don’t think we’ve solved anything in that time doing all of that” (PO15).

It was clear that almost all officers we spoke to were aware that focusing on enforcement against sex workers was an unproductive tactic as it did not reduce or eradicate sex work, instead, they felt that an already vulnerable group were even more burdened and it did not make for trust and confidence in the police. One officer admitted,

“The criminalising is not going to help. Arresting them is not going to help. Asking them to go to court so they have to go back out and earn the money to pay the fines is not going to help. We have to be more sophisticated than that” (PO4).

Another officer said,

“Normally when we come into contact with the girls we know are prostitutes we would probably tell them to go off and do it somewhere else. We would probably do some checks on the street and then send them on their way, make sure they are ok” (PO10).

Instead, officers stated that the focus of enforcement activities was now on restricting the demand and supply side of the industry, i.e. clients and those exploiting or controlling sex workers, as this officer mentioned,

“You look at it as a multi-pronged approach, it is important that we enforce and get the people doing the kerb crawling, we get the people that are looking to get the business, So we stop then, we arrest them, we stop the brothels because that’s where the danger is around the girls being controlled...But equally we’ve still got the nuclear option of arresting those females if necessary...we have covert operations, we will absolutely arrest people we feel are controlling those girls, as well, if there is an increase in organised crime.... So we do have a multi-pronged approach to how we deal with this and there is lots of enforcement going on” (PO2).

From the interviews it was clear that enforcement itself meant different things:

Client focused: Twenty officers mentioned safeguarding was one of the main roles of the police. One way of doing that, according to 12 of the interviewees was by focusing on the clients as a way of safeguarding sex workers as it would take all the risky clients off the streets, thus ensuring the safety of sex workers who are framed as victims. The logic seemed to be as follows, in one’s officer words,

“I feel very much that targeting the clients reduces demand and increases the safety of the sex workers because predators by their very nature they're very conscious and aware of police and about the environment they're going to be hunting. So, if you have an individual that's targeting sex workers, are you going to go to an area where you know that there's a proactive police operation that will target kerb crawlers? Or do you go somewhere where nothing's happening?” (PO7)

Only a couple of officers we spoke to seemed to envisage that their actions in enforcement against clients may have the opposite effect of dissuading the more law-abiding clients from frequenting the areas targeted. Wider research (see, e.g., Platt et al., 2018) suggests client-focused efforts can also mean that sex workers have less or no time to negotiate safer working conditions and condom use with clients, thus

making it more dangerous for them and with deleterious effects on their sexual health. It can also push sex work into more unsupervised or dangerous areas, thus increasing the risk to sex workers, in the words of one officer,

“We should be targeting exploiters, people who are exploiting sex workers. However, by doing that we are also removing the client base for sex workers. So, are we then making them go and work somewhere much less safe or get themselves working in more exploitative situations where because their traditional client base has dried up because we have policed them, even though we might have identified murderers, thieves, and rapists and drug dealers?” (PO17)

It also seemed a bit counterintuitive that officers felt targeting clients did not affect sex workers’ trust and confidence in the police because they often arrested the perpetrator after the sex worker had been paid. However, officers did not seem to think that the disruption of their normal clientele might lead to resentment and distrust of police on the part of sex workers. When asked if operations against their clients would be conducive to building trust with sex workers, one officer said,

“I don’t know the answer to that. It might be the fact that we are trying to prevent, you know, reduce the danger to them. But at the same time, obviously we are taking their livelihood away. So probably on the balance, I don’t know. It is an interesting question” (PO23).

In contrast, another officer was very confident that police action against clients would not produce a negative impact on trust in the police,

“No, no ironically, the exact opposite in all the cases we have had so far. They’ve been really happy because we are not taking money off them. We usually intercept the act quite early on, and to be honest, they’re surprised and quite happy that they get to keep the money and they don’t have to continue performing the act” (PO18).

The same officer went on to say that once they complete formalities of arresting the client, who is then let go, the women (for sex workers were considered to be mainly women by most officers as mentioned above) continue to stand and wait to pick up another client and “it doesn’t really impact them, if I am honest”. Another advantage of focusing on more violent clients was said to be wider than only the safety of sex workers, as this officer said,

“If that man is visiting these premises and beating up sex workers, is he also abusing his children at home and maybe his wife at home? We have got to think more broadly than just the isolated situation” (PO5).

Controller focused: Officers seemed to believe that sex workers were exploited by individual controllers, who were their boyfriends (officers called this ‘disorganised exploitation’); and or by a more organised group of exploiters. Acting against individual controllers of street sex workers reportedly required building trust with the

sex workers themselves to gather the relevant evidence. One officer (PO20) narrated an incident of a successful operation of a sex worker requesting help after a great deal of effort was put into building relationships of trust with the sex workers locally.

However, actions against more organised groups involved in brothel keeping reportedly required a sustained intelligence gathering effort and perhaps required collaboration with a specialist team like the Modern Slavery Team to conduct raids and disrupt exploitative premises. One officer said,

“If you know that you’ve got organised crime that is running 10 brothels across London, then you’re going to have to do something about that, aren’t you? Sometimes there is a fine line between disrupting that brothel and displacing those girls, but then knowing those girls are still within that brothel. So, you know it is part of the long-term investigation” (PO4).

Such investigations however, required dedicated resources and a great deal of effort to establish the involvement of organised crime, especially in brothels, as one officer said,

“If the local council get complaints, they want the brothel shut...And that shortsightedness of shutting it because you know, the brothel doesn't disappear. It just moves and there's no investigation to work out who is in charge of that. It's about creating work. Nobody wants to create work. That's the last thing anybody in policing wants to do. But you know, and when you start going down the rabbit hole, it starts taking up more resources, more staffing, more money. And it's not a priority because we're not judged on it. So where do you put your resources? You put where you're judged, not where you're not judged.” (PO7)

The theme of sex work not being a priority that the officer is referring to, is one we will return to when discussing the MPS’s local and strategic approach to sex work.

**Sex worker focused:** Most officers maintained that they themselves did not take any direct enforcement action against sex workers because they felt it was unproductive. Nonetheless, officers insisted that any enforcement actions they did take against sex workers were taken only when there were complaints from the community or residents, such as: noisy behaviour seen as being anti-social behaviour (ASB); presence of sex work debris (such as used condoms, wipes, needles, or soiled underwear); commission of the sex act in places where children might witness it; or if the area was frequented by kerb crawlers or neighbours being disturbed by a procession of men were visiting a premise that was a brothel, thus, causing nuisance. According to one neighbourhood officer, this was a great source of frustration as it often disrupted attempts to connect with street sex workers and try to gain their trust and confidence. Balancing the needs of sex workers and the demands of ‘the community’ (thus, othering sex workers as if they were not part of the community) reportedly often resulted in actions that were detrimental for police-sex worker relations and as some



officers said, “I struggle with that a lot, you know. I’ve always got to try and balance the need of the community with the individual and that is where it becomes difficult” (PO20).

More often than not, officers said they ended up taking some action, even if it was short of enforcement (such as asking them to move on) against sex workers in response to community complaints, mainly because community members had more of a voice and their complaints were given credence by senior officers. This raises the issue of how the MPS, as an organisation, lacks a considered response at the strategic and local levels to addressing issues around sex work.

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## **Safeguarding**

Almost all officers interviewed said that part of the police role was a responsibility towards safeguarding sex workers mainly because they were vulnerable. Sources of perceived vulnerability (rightly or wrongly) were attributed by officers to substance misuse issues or migrant workers wanting to have a better life and thereby willingly or unwillingly being exploited (PO11). One officer said that the police role in safeguarding involved,

“Making sure that they’ve got access to the help that they need, keeping track of their welfare, where we can try to encourage them to talk to us or speak with others... because we know that us having these conversations isn’t going to get them to exit sex work...we don’t know enough about the safeguarding and welfare provision side of things. So, we try and refer them to the experts, people like Streetlight etc.” (PO18).

Other officers said they were aware that it was too simplistic to say that they were addressing vulnerability by directing sex workers to outreach services or supporting diversionary programmes likening it to “a sticking plaster on a bigger issue” (PO13). These limits, they said, were mainly because addressing vulnerability would require “solving underlying problems around poverty, discrimination, drug addiction and homelessness” which was beyond the purview of the police (PO13).

A few officers were realistic enough to admit that police efforts were not going to reduce or eliminate sex work because,

“It’s a trade, that’s going to happen. You want to make sure that they are safe. And during that process, if you can’t stop them doing it, you can still give them some environment and health advice around where they could and shouldn’t go, to make sure they are not in any danger” (PO2).

One Safer Neighbourhood Team officer who seemingly had a bit more awareness and sensitivity towards sex work, said that they focused on speaking to street and off-street sex workers, to reassure and encourage them to access outreach services or

help with housing or employment, whilst at the same time feeling the need to explain what he meant by safeguarding,

“We are there to safeguard them, and I know it might sound a bit ridiculous because how are police officers safeguarding sex workers? But it is not like we are just standing there safeguarding them, because a lot of these sex workers they get robbed on a daily basis and so many times, they won’t call the police...sometimes it is their language barrier, sometimes they just feel like ‘oh, it’s not important enough’ or ‘oh, the client has gone’ but I feel like if we are there we are sort of flagged down a lot by them. So, I feel like because we’ve built a relationship with them over time, they sort of come in and tell us what happened...sometimes it’s literally showing our presence there” (PO21).

However, not all officers felt that the police should be the main safeguarding agency, in terms of welfare, but that,

“The shift has to go from the police for safeguarding to other safeguarding agencies...I think the best way we [the police] can safeguard is to remove the risk by going after those that bring harm, exploit, and make money” (PO22).

Thus, under the theme of safeguarding, officers spoke about sources of vulnerability embedded in sex work; their role in signposting sex workers to what they saw as appropriate outreach agencies and services; being approachable and gaining trust so as to encourage sex workers to contact the police when victimised; and finally, removing risk by tackling those who cause harm and exploit sex workers.

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## **Service to Victims**

We use the phrase ‘service to victims’ to refer to the police response to sex workers as victims of crime. We asked participants whether they thought that it was satisfactory. Seven officers who did not have front line roles or had little interaction with sex workers in their career said that they honestly did not know the answer to that. However, most of them, along with many other officers, believed it was satisfactory, although, they invariably added that it could be improved. As one officer said,

“I think if somebody came in and said now you know, ‘I’m a prostitute and I’ve been raped’, I think people would say, OK, let’s report that as a rape... whereas 20 years ago, they’d say go away just because you’ve not been paid...We should be investigating it as rape. Just cause someone’s selling themselves for money doesn’t mean they’re giving anybody the right to, you know, have sex with them...I think there’s probably still judgement there about the fact that they are sex workers, but I don’t think it would affect how we would deal with their crime in the same way as any other” (PO15).

The reason for this perceived change in attitude was attributed by one officer (PO16) to “I think it is societal change – ‘let’s see them more as victims rather than suspects or offenders’”. Although one officer (PO15) was more cautious and caveated their answer by saying the police response would depend on where the victim was reporting, if it were in an area where sex work was not a big issue, officers might be more responsive than another area where they were seen as creating a bit of a nuisance for the community. The same officer stressed that this was neither appropriate nor justified. Another officer said,

“Obviously every police officer is different. And there will be, as with everything, shitty officers. I would hate that someone comes in to report something and the person in the front office or whoever it is, has had a bad day and they've just and then absolutely just smashes the trust out of the window, where everyone else has been working really hard.... I don't know how you'd because it only takes one person and then it's you're back to square one” (PO12)

Eleven officers said that they did not really think the police were making any special effort to encourage sex workers to report crimes. One officer said,

“If a reactive crime comes in involving a sex worker, I think actually we're quite good at dealing with sexual offences, with vulnerable people...I don't think there's particularly that energy or interest in going looking for it [sexual crimes], almost - ‘if we don't look for it, then it we don't have to worry about it. If we find it, then we have to deal with it’” (PO7).

Responding to the question of whether the police would register complaints made by sex workers who were victims of crime, one officer felt that although rapes of sex workers would undoubtedly be taken seriously, the officer did not feel that these victims were getting a satisfactory response - not because they were sex workers, but because the MPS’s response to any victim of any crime was the same - “As a resident of London, when I report a crime I don’t get a satisfactory response from the police” (PO22). Such a blanket denial of any possibility of inherent bias or judgement by other officers who might not share liberal attitudes and values whilst dealing with sex workers, is worrying in the face of wider evidence and from the stakeholder interviews, especially from an officer who was otherwise critical of MPS practice.

Additionally, although six officers said that, in their opinion when sex workers approach the police with a rape complaint, it would be taken seriously and “they would be treated like any other victim of rape” (PO22), it might be the case that the follow up for any victim of sexual assault was not always satisfactory. As one officer said,

“The only thing I have noticed, it is hard, maybe the officers, kind of, give in too easily if the victim is not interested in taking the case further... I get the feeling that as soon as the sex worker is not interested or does not want to take it further then the case is closed, like, straight away” (PO14).

Another reason why cases might not be pursued further, according to the interviewees, was because officers have a huge workload and plausibly if the victim is hard to contact then it becomes easier to push that case off their desk as 'no response'. One officer who had some experience of working with victims of rape and apparently had some understanding of the lives of sex workers said,

"I think writing off a number of reports can be an option when you have an officer who's got a hundred reports they're trying to plough through. I can think how difficult it was for me to get in contact with some of my sex work rape victims, because even though they've been raped, they still need to go out and feed their habit. So, they sleep during the day and they'd be working the next night. They have mental health issues. They'd have children to look after. They'd have dogs to look after. They'd have a whole world of other things that took priority over engagement with us. So, for me, I could easily put an entry on the report saying tried to make contact - no response. Three times and we'll close it off. If they want to come back and talk to us in the future, they can" (PO17).

The officer went on to say that investigating officers need to be sensitised to the pressures and work routines of sex workers to provide the best possible service to victims who might have numerous vulnerabilities.

Only one officer said that providing a service for sex worker victims is not just dependant on police investigations in cases where it is sometimes difficult to establish consent to the sex act, but even if the police do good investigations, victims are let down by the criminal justice system because,

"We do all that good work trying to prove it in everything, and then we take it to a jury. Well, who is this jury? A jury is essentially a bunch of muppets. They are Mr Burger Fryer from down the road, Dave the chippy, Mrs Doris, with the big nose to poke in everyone's business that thinks she knows how to solve the crime in the world. This is who we're bringing this to. And then added to that, 'She's in the adult industry. Ohh! she wanted it. She does all this. She's a well-known porn actress'. Do you see what I mean?" (PO11)

One officer identified an additional source of vulnerability as emerging from the known lack of trust in the police: saying that sex workers were mostly reluctant to report crimes, which made them more likely to be targeted.

"Sex workers are going to be targeted by some of the nastiest people going because those people know that sex workers probably don't trust police and would not necessarily want to report what's happened to them because they don't think they are going to be believed or get a good level of service" (PO13).

This point highlights the importance of trust in the police, which was another theme identified by interviewees. However, before moving on to that, it is important to emphasise that all the officers spoke about level of service in the case of very violent and serious assaults and rape but no one discussed the police response to other,

perhaps less serious, instances of victimisation.

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## **Building trust and confidence**

Interviewees were very aware that there was perhaps a lack of trust and confidence in the police from sex workers. Answers to the question, 'do you think sex workers trust the police?', ranged from "I don't know" (PO11), to "They might or not" (PO14), and "Even though there is violence against them, it's not reported because they don't trust police, the police aren't interacting with them because the girls don't even report it" (PO19).

One officer said,

"I think some sex workers in London trust the police, definitely because we still have sex workers who report directly to us or are comfortable with their supporters reporting to us as well... I've had numerous successful interactions with sex workers as a police officer, supporting them, sometimes arresting them, sometimes not arresting them, but supporting them through the process. And I think it's down to how you are with someone, isn't it?" (PO17)

This theme of how individual officers treat sex workers and make effort to build rapport with them and be supportive in order to gain trust was repeated by almost all the officers. The importance of gaining trust was seen not only as an intrinsically valuable goal for the police to pursue, but it also had an instrumental value because, "Building of trust is an interim outcome for the ultimate outcome of increased reporting" (PO3) as well as to gather more information about associated crimes in the sex work industry, "if we don't build up a rapport with sex workers and their support services, then we'll never know who is exploiting them, and when they're being exploited" (PO17).

Another officer said,

"Building trust for the sake of building trust is fully legitimate, because that's when people come forward and report a crime and they're only going to do that with someone that they have trust for because ...you know, Eastern European people, they come from, even the police forces out there are quite brutal and corrupt. So, there is a big fear of the police and the uniform and things like that" (PO20).

Although it might be true that many of the migrant sex workers in London originally come from regimes with exploitative and unsympathetic police forces, this provenance was emphasised by a few officers as one of the *main* reasons for poor confidence in the police in London. Furthermore, a few officers also referred to poor treatment of sex workers by police officers in the past as the reason for lack of trust more generally. There was a perception that the lack of trust in the police was not just concern from sex workers that they would not be taken seriously by the police but that the police would fail to protect them from the perpetrators of crimes and exploiters, especially where organised crime may be involved (PO11).

Some of the tactics adopted by police officers in trying to gather intelligence (as we shall see in the next section) and specifically to address organised crime, were felt to be counterproductive to building relationships of trust. One officer was blunt to the point of saying,

“Well police can stop ringing them up and asking, pretending to be a client and finding out where the brothel is and then visiting as the police. So, start off by stop lying to them” (PO22).

The fact that nine officers said the police should be making more of an effort to have frequent and supportive interactions with sex workers, get to know them, be a reliable point of contact indicated that there is awareness that perhaps the police are not currently involved in relationship building in that sense. A lot of that can be attributed to lack of resources and a lack of clarity around who has responsibility for the response to sex work, as we will discuss a bit further in the report.

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## **Intelligence gathering**

Interviewees had mentioned earlier that it is important to gain the trust and confidence of sex workers for intrinsic and instrumental reasons. One of the instrumental reasons given was that they were seen as a good source for gathering intelligence, as one interviewee put it,

“I think people forget that they [sex workers] are a very good source of information because they're in and around criminality and drugs all the time. So, if you can speak to a sex worker, they'll tell you stuff... you know we're police officers, we need to get information and intelligence on criminality” (PO13).

Whilst some officers focused on getting intelligence on clients, especially violent ones, others were more focused on getting intelligence on those who they thought controlled sex workers, on the street but mainly in brothels, which was seen as being more lucrative and more under the control of organised crime. One officer said,

“I feel like there should be more work done around some of the controllers because I think it's frustrating, you know, having all the intelligence but not the evidence... And obviously the more intelligence we have the more we can have, like get warrants or, you know, like, get a specialist crime unit to help us” (PO21).

Another officer identified specific information that would be useful to the police that they would like, such as,

“What's the story behind those girls? How do they get here? Who's taking their money? Who's running the brothel? Who pays the council tax?...Who is controlling the prostitution?” (PO22).

However, officers who had previous experience of investigating cases with suspected involvement of organised crime or were currently in supervisory roles, were a bit frustrated with the lack of intelligence and analytical capacity to collect information and connect the dots to build a picture of the networks involved. They suggested that the current systems did not allow for this. Moreover, no officer interviewed was completely sure about what happened to intelligence reports that were submitted by local response and Safer Neighbourhood Team officers. One senior officer said,

“It comes down to intelligence, which we just simply are not using properly at the minute to build up that picture... if you've got a healthy throughput of intelligence that's been analysed properly, that drives more intelligence, causes officers go looking for it, we ask for it more. If it's not, if officers keep putting intelligence in, but nothing happens with it, where's the motivation?” (PO5).

Another officer admitted,

“The biggest failure I think of Moontwist<sup>3</sup> is the intel development. After the visits are done, the reports are put in. There's no follow up unless there is a sex worker that says ‘yes, I'm being trafficked’. Nobody uses that intelligence in a productive way.” (PO7).

However, officers’ perception of their policing role, which included all these different aspects, also had internal discord. We use brothel visits as an illustration of how the various aims mentioned by the police interact and can either enhance or cancel each other in ways that need careful thinking through if the practice is to be continued.

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### **Illustrative case - Brothel visits**

One of the topics explored in depth with officers was their understanding of the purpose and aims of brothel visits. Less than a third of the officers interviewed had conducted or participated in an official brothel visits. However, most of them had a view on them.

Multiple aims were mentioned by officers, starting with ‘welfare’ checks, reportedly mainly for safeguarding purposes but also for both enforcement and gathering intelligence, with aims often being intertwined, as this officer mentioned,

“It’s a welfare check and yes, we are looking out for the welfare of the girls. It’s not like we go in there and our sole purpose is to gather intelligence, but incidentally, gathering intelligence leads to improving the welfare of the girls, even though it is not an immediate outcome” (PO19).

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<sup>3</sup> Operation Moontwist is a proforma of questions that officers are expected to ask occupants of premises suspected to be brothels.

A few officers were convinced that brothel visits were important because,

“We’re there to safeguard, aren’t we? If you don’t go in and speak to these people, how do you know they’re not in trouble behind those closed doors? How do you know they’re not safe”? (PO4).

When asked whether in their experience sex workers are likely to tell police during visits whether they are in danger, the same officer went on to admit. “Sometimes, not always. But you also come away and you have a feeling and you know if something’s wrong” (PO4). Several officers stated that it was their duty to safeguard sex workers who might be exploited in brothels and the way to identify them was to visit brothels to get a sense of whether something was amiss.

Thus, officers mentioned brothel visits in the context of routine ‘welfare checks’; in the context of raids following specific intelligence about some form of exploitation or suspected trafficking; and in response to complaints from neighbours. One officer said that for him apart from gathering information and responding to concerns about exploitation, the third aim of a brothel visit was responding to ‘community’ concerns,

“...informing them that we have had a number of complaints from the wider community about the way these premises are being used, then negotiating or agreeing a way that we could perhaps make changes so that the wider community is not feeling that impact as much” (PO5)

Another officer said,

“I don’t see a downside to it, you know. Even if it is just from an engagement and kind of safeguarding point of view and to build relationships and encourage, sort of, trust for reporting and stuff, then yeah, I don’t see why we shouldn’t do it” (PO23).

Interviewees’ views about whether the police should be conducting brothel visits fell along a continuum, with some officers stating that routine welfare checks should emphatically not be within the purview of the police and should be conducted by local authority, health, and other outreach agencies. For example, one officer emphasised,

“I don’t think we should call them brothel visits, because if they’re going to be welfare visits then I think the other agencies need to do it. The safeguarding, health, and local authority, if it is licensed premises...I think for police to visit a brothel, it has to be part of a criminal investigation” (PO22).

Some officers felt that the Safer Neighbourhood Teams should be conducting regular welfare checks, preferably with partner and outreach agencies, in order to ensure the safety and welfare of sex workers. Operation Moontwist was often invoked as the form that was to be filled out by the officer doing these visits. The Moontwist proforma was a series of questions that officers were meant to go through with the



inhabitants of brothels designed to help with the identification of potential victims of trafficking for sexual exploitation. Although meant to be a guideline, most interviewees who had heard of Moontwist, (except two) mentioned that the form was very long and became largely a box ticking exercise when administered by inexperienced officers, thus not contributing in any significant way to either identifying vulnerabilities or building trust with sex workers. As this officer said,

“So you knock on the door, you’ve got to basically talk your way into the property...by the time you get in everything is put away...You can’t search. You’ll sit down with the girls individually and you’ll ask them a series of questions. From my experience, they are not done with much gusto, those questions, sort of a bit of a ticky box exercise, which I don’t like...by that time the people managing the brothel know that the police know it is a brothel and a good percentage of the time they’ll just move the girls to another place, so by the time you go back the next week they’ll be gone and then you’ve lost then all of your intelligence”. (PO20)

The general proforma with a set of questions for brothel visits was created by a few neighbourhood officers a few years ago and came to be called Operation Moontwist. One of interviewees (PO17) who had some early involvement in its set up said that the form was meant to be only a guide for officers to ask relevant questions mainly for “safeguarding purposes” and it was not to be used as a box ticking exercise. At least half the officers interviewed were not aware of Operation Moontwist when asked. Those who did know it, suggested it was not very helpful in building trust, because it was administered by “community officers who are not comfortable in dealing with sex workers” (PO13). The result was described as follows,

“Although well-intentioned, but you cannot deliver it without having good knowledge and understanding and awareness of what you are going into and what you need to do subsequently” (PO13).

Another officer chalked the approach described above down to the general *ad hocism* in the police, specifically identifying a lack of training for officers on how to conduct proper brothel visits, “There’s no guidance, but then that’s just the police in general. You just sort of get told to do something and are expected to do it” (PO12). The result, according to one officer, was a mismatch between stated aims and actual outcomes, “Yes, it’s great for gathering intelligence. Is it doing what it is supposed to, which is identifying trafficking? I don’t think so” (PO7).

Officers appeared to think that these visits were benign and caused little, if any, damage as a matter of routine. For example, one officer said,

“If we do happen to have got it slightly wrong and it isn’t a brothel but independent sex workers [working together], then we explain the reason behind why we are doing it, and I have to say that’s never caused a problem. They tend to appreciate that were bothered to look and bothered to engage with independent sex workers” (PO8).

When specifically asked if they thought these visits might have any negative or unintended consequences, officers seemed to think that the worst outcome would be that the brothel would move to another location and they would lose any intelligence on it. Additional outcomes mentioned by two officers included the premises being outed as a brothel to neighbours, who might make life difficult for the sex workers, as well as, increasing distrust and reducing access to outreach services following a visit by the police. Officers did not dwell much on these side effects, mentioning them as if they were undesirable but inevitable. Not doing these visits, despite the possibility of some unintended negative consequences was not an option for this officer because for them these visits meant that the police were taking an active interest in sex worker wellbeing,

“I think the alternative is not palatable to me. The alternative is that we have no knowledge or understanding really or insight as to how that community is feeling. It feels like they are at arm’s length. We just let them get on with it. We’re not showing an interest. We’re not available or accessible to them...almost as if we don’t care” (PO5).

In any case, interviewees were agreed that if at all the police were to conduct these visits, they should be given some training to do so and should be done by experienced officers with some understanding of the complex issues involved in sex work.

Although some officers could not see many downsides to brothel visits “I think they are really important, I think we should have more power to enter brothels” (PO19), others acknowledged some downsides, such as those below identified by one officer,

“If you are going in quite en masse and you are going in uniform, it might be that you are suddenly highlighting it to neighbours and things like that, which could make life difficult for sex workers. Also, if they are being trafficked or coerced, it might cause issues for them if the traffickers get wind of it. So, I suppose there could be some negatives” (PO1).

Another officer presented a minority view (shared by only one or two other colleagues) about the impact these visits might have in terms of both finances and trust, particularly if Immigration Enforcement was also involved.

“If you’re looking at someone who is working to get money to support a child or an addiction, then ...you have stopped money coming in on that day or afterwards. That doesn’t actually build any trust, does it? ...You are alienating people who very often don’t have English as their first language and because they are in complete fear of policing in their home countries would never engage with police in their home countries...and then you throw immigration into that as well and all the fears and barriers around that, umm? Why on earth would they engage with us?” (PO17).

In contrast, a few officers maintained that if they didn’t do these visits, no one would, and furthermore that the benefits, in their perception, clearly outweighed the risks. It seemed apparent that most officers felt they could not relinquish their authority to

conduct brothel visits, and were convinced that their visits were reassuring and helped created some trust, as this officer suggested,

“Even if just from an engagement and kind of safeguarding point of view and to build relationships and encourage sort of trust for reporting and stuff, then yeah, I don’t see why we shouldn’t do it. There’s another question on top of that – that is, if they, police didn’t, who would do them [brothel visits]?” (PO24)

Furthermore, officers from the specialist Modern Slavery Unit stated that any brothel visit [either by them or by frontline officers] should be conducted only following the receipt of some intelligence which is then confirmed after conducting some checks, such as placing the premise under surveillance, looking through any phone records, or web advertisements, before attempting to enter suspected premises. Furthermore, a few other officers stressed that it was important for those conducting visits to have knowledge and understanding of the consequences of their conduct during the visit and to mitigate risks, if any, to the sex workers involved. The process adopted by officers was described by one participant thus,

“It depends on the nature of the brothel we have walked into. If it is being monitored covertly through cameras or whatever, or they are being watched or listened to overtly by organised crime groups, or when there is a language issue and we don’t quite know what they are saying to each other. So that is why we generally try to keep each person safe by separating them out into rooms, so that they each don’t know what is being said to us by the other. We keep it discreet in that sense, if they do want to make a disclosure. But yeah, I can totally appreciate that it sometimes could cause a problem for them, because ultimately, we always leave the premises, and we don’t know what happens afterwards” (PO8).

Whether the idea of separating out individuals into separate rooms and being questioned by two officers is ultimately safer or more anxiety-provoking for migrant sex workers, because they might have language issues, is an area as in many others where the views of police contrasted sharply with those of participants from sex worker-led organisations (see Chapter 3).

One of the most contentious issues that we discussed with the police officers was the role of Immigration Enforcement in policing sex work. The recent National Police Chiefs Council (NPCC) guidelines on sex work clearly state that there should be a “clear separation between immigration law enforcement and sex work law enforcement. That migrants know that they do not risk deportation if they need protection from the police” (NPCC, 2023: 67)

Of the 18 officers interviewed after the new NPCC guidelines were released, eight officers said they had not heard of them whereas seven officers, majority of whom were closely associated with Operation Evergreen, were familiar with the contents and one senior officer said he knew of its existence but could not quote its contents. This is important because when we asked front line officers who were involved in brothel visits (n=14) whether they would involve Immigration Enforcement when they

came across migrant sex workers in brothels, the responses indicated that those officers who were not familiar with the NPCC guidelines, were a bit unsure about whether they would or would not involve Immigration Enforcement during or following brothel visits.

When all the officers interviewed were asked whether they would/should involve Immigration Enforcement in brothel visits seven officers (of the 24 interviewed) said that they categorically would not. Not all of these officers were familiar with the NPCC guidelines, but they said that instinctively it felt like a bad idea. For example, one officer said,

“Hmm, I've never thought about it. I wouldn't. I probably wouldn't take them because if you've got a lot of women who have been trafficked into the country at the last thing they wanna see probably is an immigration officer... Yeah, I think that it would send the wrong message to the, to the sex workers. ‘We're not here for your safety or your welfare. We're here to make sure you go back to your country of origin.’” (PO18)

One participant said that “there should be a firewall between immigration services and the work of the police” (PO6). Another participant said that in the past they had involved Immigration Enforcement, but the NPCC guidelines seemed to suggest that “we don't involve immigration...a lot of the guidance is quite grey and leaves open to interpretation, a lot of areas, including immigration” (PO8).

Four officers said that in the past when they had visited brothels, they had checked the immigration status of occupants (in one case [PO1] not of the girls in the brothel, only the man overseeing the premises), but did not actually say whether they would do so again should the occasion arise.

Two officers said that involving Immigration Enforcement was perhaps an option they would consider although one of them said that he would prefer not to take immigration officials whilst doing a brothel visit with suspected irregular migrant sex workers, “Because if we're trying to sort of build trust and get them to say, ‘I'm not happy’... they're not gonna say that because they're gonna be afraid of being sent back and owing money and whatnot. So [it's] maybe not the best idea to go with them” (PO12). But he said that he would report his suspicions later to Immigration Enforcement. The other officer (PO3) said that he would involve Immigration Enforcement, saying it would be for the sex worker's benefit because he was accountable for their safety, and added,

“If you think they're vulnerable and you're trying to get them out of that scenario. If there is an immigration offence, it does allow you to take them away and put them into a place of safety. To some extent to still continue that support, if that makes sense. So it's an option.” (PO3)

Only one officer said that they would take immigration officers to do brothel checks but not whilst checking the status of street ‘prostitutes’ and would be sure to conduct

checks on all Eastern European sex workers from the immigration point of view and take fingerprints. However, the officer continued, “if they’re Brazilian[s] or, you know, those who need visas and whatever then more likely, we’d probably take immigration with us to do those [on-street] checks” (PO15). This apparent discriminatory racial profiling raises a number of red flags about how many front-line officers might share this viewpoint and the resultant damage it might continue to inflict on police-sex worker relations - a fact that seemed uppermost in the minds of officers who said they would not involve Immigration Enforcement whilst interacting with migrant sex workers as victims or during brothel visits. Officer and other stakeholder perspectives on this important topic of involving Immigration Enforcement with respect to sex work and trafficking for sexual exploitation will be compared and contrasted in Chapter 4.

## **Perceptions of current police operational responses and ‘what works?’**

In pursuit of understanding the MPS’s current responses to sex work and sex workers, we began by asking participants who ‘owned’ sex work for operational purposes and what knowledge they had about MPS’s sex work policies at the local and strategic levels?

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### **‘Ownership’ of sex work**

By ‘ownership’ we meant who was held accountable or responsible for the local response to sex work as an area of policing business. It would determine who would respond to calls associated with sex work and sex workers and who would be responsible for having and developing requisite relationships with stakeholder agencies and proactive policies to safeguard and protect sex workers. Answers of the 22 participants who were asked the question (the participants from City of London police and MOPAC were not asked this question) indicated that there was a mixed picture and a lot of ambiguity around who currently owns and who should be owning sex work response.

Three officers said they had no idea, indicating that either they had not really thought about it, or they genuinely did not know where it currently sat or should sit at the local level. One officer said, “I have absolutely no idea who, who owns it overall. Not a clue. I just tend to go to the central team [Operation Evergreen] if I need anything” (PO1). Further, the officer did not know whether the response to sex work was within the remit of the local Safer Neighbourhood Team (SNT) in his area. Another respondent (PO12) who led a local SNT said he had no idea who owned sex work, but when asked whether and how much it formed part of his day-to-day work, he said “absolutely zero”. He then elaborated that this was the result of shifting of responsibility between strategic command and field level officers, as detailed below.

“The bottom will tell the top they [the top] are responsible and the top will tell the bottom they [the bottom] are responsible, but it's the old saying that the ship rolls

downhill, so, categorically no one. No one owns responsibility for it because there's no central oversight... At the borough level... there is no specialised unit at borough level to deal with that and [which] has the capability, the assets, the money resources, legislation to change that and to deal with that." (PO12).

Five participants responded that they thought that it was unclear, saying, for example, "At the moment I'd say, there is a lack of clarity" (PO13). This group of officers felt no one 'owned' the local response to sex work, but that different aspects of the demand for service would elicit response from different units. For example, one officer said,

"I don't think there's any official ownership. I think it lands wherever is the most easiest option. So, if a phone call goes in to the police. And the report is, I don't know, 'there are people having sex in a public environment', or 'there is a street sex worker with a client and they're having sex in my garden' - that would be the response team that deal with it.... Or 'there's an address where men keep coming to, they keep knocking on my door first. But there's a brothel next door' - I think that would go to neighbourhoods [SNT]... I think if there's a whole bunch of crime outside a brothel, say, a stabbing or there's some dealing, then that would probably go to the CID" (PO22).

Just under half the participants questioned (n=10) felt that sex work was within the remit of SNTs. Some because they thought it just made sense, "All of neighbourhoods should own their area...it's a local problem...they'll have the data within their grasp" (PO16). Others felt that since they were already dealing with it, it should remain in the purview of the SNTs. Thus, ownership of the response was loaded on to SNTs both because they were considered the most suited to deal with it, and also because they were de facto dealing with it in some areas.

Some others felt it was the SNT's responsibility more by default or because that was how it was dealt with at their local borough level.

"I don't know if there's a specific owner of that issue. If there is, I've never been made aware of it. But I guess it is a local issue other than the VAWG aspects. The actual day-to-day investigation of it will come down to SNTs. You know, dealing with issues as they arise in their particular areas" (PO23).

Another officer qualified a similar point by saying that they thought SNTs were the first point of contact in relation to sex work, but if needed they could escalate it to other specialist teams,

"Probably the neighbourhood Superintendent, but I don't think they know that they do because I don't think there is that clarity that we discussed at the beginning of the interview and they are the starting point for getting it right... when the information gathered from the neighbourhood team suggests that further activities are required, then they have to escalate and get that wider support that they might need, both from specialist central teams or from other teams on the borough. But starting point - neighbourhoods" (PO5).

Although one officer (PO7) said it currently sat with SNTs because they dealt with mainly on-street sex work related issues in their borough, they did not believe it was the right place because “not every borough has an on-street sex problem, but every borough certainly has a brothel issue.” Therefore, they suggested it would “fit very nicely in the public protection portfolio, which are predominantly CID based” who could develop a “specialised team” with access to the necessary intelligence and contacts with the stakeholder agencies (PO7).

This opinion was echoed by three other officers who felt that although currently sex work sat with SNTs, Public Protection Units (PPU) in each borough should be the rightful owner of the MPS response to sex work. One officer said,

“In my personal opinion, I think it should not sit with neighbourhoods. I think there should be a separate team in an ideal situation, with no other demands or pressures. But for me it would sit in Public Protection as a standalone small team with... either a direct link or some affiliation to neighbourhoods” (PO24).

It was interesting is that the immediate response to the question of ‘ownership’ was to the reactive aspects – responding to complaints, investigation of crimes etc. Barring a few SNT officers who had dedicated teams working in this area, no one mentioned that ‘ownership’ implied also having the resource and manpower required for investing in creating and maintaining relationships of trust with sex workers and with outreach and other stakeholders. Officers who did mention that, said SNTs in general were poorly resourced and often officers from the specialist team Operation Boxter<sup>4</sup> were either regularly abstracted for all other duties, and towards the end of this research had been disbanded and reallocated. This development indicated that perhaps sex work was not part of the police’s Key Performance Indicators, a theme we shall return to further on.

Although there was lack of clear ‘ownership’ of the response to sex work, what was abundantly clear was that ‘prostitution’ sat under the Mayor’s Violence Against Women and Girls (VAWG) strategy for London.

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## **Violence Against Women and Girls**

The NPCC (2023, p.2) guidance firmly situates the police response to sex work under the VAWG umbrella and recommends drawing upon the three pillars of the agenda “Building trust and confidence”, “Relentlessly pursuing perpetrators” and “Creating safer spaces”. Thus, it was clear from the guidelines that there was an expectation for the police to not just have a reactive strategy for sex work related issues, but were meant to proactively work to create safe spaces and build trust and confidence with sex workers.

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<sup>4</sup> Operation Boxter was a small team of dedicated officers working closely with on-street sex workers concentrated in a small geographic location in a North London borough.

Officers were asked whether they thought it was useful for sex work to be brought under the Violence Against Women and Girls (VAWG) umbrella and what might be the impact of doing so. Officers' responses were not always very clear, but most interviewees seemed to think it was logical that violence against sex workers should be brought under the VAWG umbrella, because "a majority of what we deal with are female sex workers and you can't escape that" (PO4).

When asked whether sex work being under the VAWG umbrella might disadvantage cis male or trans sex workers, the attitude, by and large, seemed to be that perhaps this would be in any way detrimental to cis male or trans sex workers.

"I think, although it comes under the VAWG umbrella, certainly I would just treat a sex worker as a sex worker. Male, female, whatever. I wouldn't deal with them any differently. But... if it was a fully male brothel or trans brothel, I don't think it would be dealt with any differently just because the response comes under the VAWG umbrella. I think it is just a technicality that it is under the VAWG umbrella" (PO15).

The quote was very telling because the officer seemed to be suggesting that they would treat a sex worker just like any other victim, without regard to gender and one questions whether that would mean without accounting for any other kind of vulnerabilities as well. Furthermore, another officer said that they did not think the response to cis male or trans sex workers would suffer for sex work being under the VAWG agenda, although it was their personal opinion that perhaps there ought to be some women only areas and therefore including the response to sex work under VAWG might not be as meaningful as perhaps intended,

"Because I do think that women need additional protection, But you know what? I'm fed up with men coming into women's spaces, but that's my own kind of politics. Just let us have our VAWG agenda, you know? But yes ...male or trans sex workers... they can be vulnerable...we are aware of that...But everything is dealt with quite equally...I don't think actually labelling something the VAWG agenda has any gravitas anymore. I think it's been overused, and I think too much has been hidden within it or behind it or under it." (PO22)

Some officers called into question the purpose of including sex work in the VAWG agenda. As this officer questioned,

"Yes, it's part of the VAWG agenda now. But what does that mean exactly in relation to assisting us in doing our job? Does MOPAC give us anymore funding for that? Does MOPAC understand that [a] sex worker case is difficult and nuanced and chaotic and complex as it is? I don't think they do. I think they probably just don't want to see it or deal with it" (PO17)

Another officer disagreed and felt that including sex work under the VAWG agenda had some advantages, but highlighted the fact that it lasted only as long as VAWG was a priority for the police,



“Yes, we got more support, more funding. I’d say that there’s a lack of consistency across, like, what we’re doing. As soon as it stops becoming the flavour of the month, then we go right back to where we were” (PO20)

Not all officers agreed that it brought in additional funding or resources.

There were three officers who felt that perhaps this positioning might result in cis male or trans sex workers not getting the same level of attention or being sidelined,

“I think probably because it [VAWG] focuses around women ...they [cis male and trans sex workers] might feel a little bit that they don't have the same level of support or they might be blindsided to some of the stuff that's available.” (PO16).

Overall, it appeared as if officers did not really think including sex work under the VAWG umbrella actually made much difference for front line policing, except that it brought greater attention to the issue and some ad hoc additional funding, as this officer said,

“I think it focuses attention and highlights the issue utilising that aspect of policing. Which is positive and I guess it goes back to increasing the visibility of a policing response to sex work and using that to champion a better response for victims” (PO24).

Overall, although officers interviewed seemed to think that including sex work under the VAWG agenda did not really add anything substantial to the police response, a majority of respondents saw few downsides to its inclusion in the VAWG agenda, especially in the response to cis male or trans sex workers. However, given how few of them had actually interacted with or come across cis male or trans and/or non-binary sex workers (see above), their opinion could be taken with a pinch of salt. This viewpoint, again contrasts with the perspective of other stakeholders, as we shall discuss in Chapter 4.

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## **Local and strategic MPS sex work policy**

We asked officers whether they were aware of a local policy for sex work. And the answers indicated that officers thought about this in different ways. Most officers said that it was not a priority in their borough, but it might be in some boroughs, depending upon the area. For example, one officer stated, “if you look at the number of people affected by robbery compared to those affected by a sex worker problem, there is no comparison.” (PO15)

One officer said that local priorities were set by the community and “in none of my four wards, sex work is a priority for the community” (PO10). Similarly, another officer said their priorities were what the community considered important, which was

serious crime and, given the myriad tasks they had, the focus would be on completing those that otherwise were “gonna get me sacked” (PO11) but sex work was not one of them because it was not important for the community. The officer also said they would personally care about what they could and could not achieve with the existing powers, and “I cannot achieve doing anything with the sex work [area], I’ve got no powers” (PO11).

Officers said because the community partnerships did not particularly prioritise sex work any initiatives in this area were down to the individual attitudes of senior officers,

“You may get a Superintendent who's quite enlightened and wants to do something about it, but Superintendents come and go. I've had four Superintendents in 12 months and each one's got a different view.” (PO7)

The lack of consistency in the policy and response to sex work at the local level is concerning. However, what this officer went on to say subsequently about the role of senior officers is even more so,

“One thing which I got very angry about ...with my senior management, is that they feel we are facilitating sex work by doing what we're doing and following the NPCC guidelines. So, you know, we're not criminalising [sex workers], we're targeting exploiters, but because we're not arresting sex workers, they view it as we are facilitating it and letting it happen. And that's from up top. And that's a dangerous point of view, and one [with] which I thoroughly disagree.” (PO7)

A lack of empathy and understanding of the NPCC guidance on sex work and perhaps some officers’ antiquated ideas about dealing with sex work by arresting sex workers might be very counterproductive to the aims of Operation Evergreen and the MPS’s attempts [should it choose to in the future] to provide a good service to a group ‘at risk’ of victimisation.

One of the issues identified by officers was the lack of motivation both among individual officers and at the borough level (except for a few exceptionally motivated individual officers) to take any proactive action to safeguard or protect sex workers from victimisation. The lack of preventative effort was attributed to the lack of any Key Performance Indicators in the area of sex work. To that extent, it seemed as if the sex worker community was overlooked in policing strategy in London and there was little recognition to the work done by SNT officers who were deeply committed to their work in this area.

“For the kind of work we do, we’re not given figures but we know people look at things like our arrests and our stop and searches and things like that. Well, arrests and stop and searches don’t necessarily lead to safeguarding sex workers so why are we looking at those? They’re not good indicators of the work we do” (PO20).

When asked what they thought were the KPIs for his SNT, one officer responded,

“That's a good question. I've got no clue. I don't care, but I'll be pretty honest that it doesn't interest me. My interest is if I have intelligence to say someone's been exploited, I'll go to it and try and help them. When it comes down to key performance indicators, you ask management” (PO3).

Officers from the Modern Slavery Unit seemed to be clear about their KPIs, (which they did not elaborate upon) but other officers were less sure. One officer (PO7) said that work in policing in relation to sex work was self-generating, in that if you try to look at the root cause of issues, you discover problems and create more work for yourself and others. Additionally, they suggested that the fundamental problem was that,

“Sex work isn't written down anywhere as something which any borough commander is gonna be judged against. Yes, they get complaints [from the ‘community’], but up high it's not a figure that anyone is worried about as compared to all the things which the Met are sort of judged against - burglaries, robberies, violent crime, murders, crimes that have factual figures and clearances, which could be counted.” (PO7)

The lack of KPIs in this area was recognised by senior officers working with Operation Evergreen who said that this research was a step towards identifying what might be considered good performance in this area.

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## **Partnership work with outreach and other stakeholders**

Outreach and other stakeholder agencies included including sex worker organisations, faith-based charities, various NGOs, health services, housing, local authorities, etc. Participants were asked whether they had good relations with outreach and other stakeholder agencies at the local level. A lot of officers grouped outside (i.e. non-policing) organisations as ‘outreach’ regardless of whether they were charities, NGOs, health services, or local authorities.

This question elicited the most response from officers and there were lots of discussions about officers’ experience of working with these organisations and with their expectations of them. Further, they discussed challenges in building good relations and networks with outreach services and other stakeholders.

The response to the question of whether they had good working relations with outreach (as defined by them) varied from being - very good both in practice and in principle (n=16); a work in progress (n=2); both good and bad (n=2); not good (n=2); and finally, a few not even knowing the outreach agencies working in their area (n=2). Half of the officers interviewed (n=12) said that they had really good relations with the local outreach agencies in their area and some had had good experiences of working with local authorities. Officers used phrases like-

“Charity workers are invaluable” (PO10);

“We are not just here to penalise sex workers, you know, there are some great allies in this space who will bend over backwards to work with you” (PO13);

“We work with x [redacted] council in regards to their drug referral service... all we do is signpost it to them” (PO18).

One officer said about working with outreach agencies in their local area, “They don’t have a good relationship with the Met, but they have a good relationship with the team” (PO20). Several officers mentioned agencies by name and the kinds of outreach work that was done in partnership, which they had found very satisfying.

A few officers (n=4) spoke about the importance of having good relationships with outreach and other agencies working in this space enumerating the different ways in which this might be helpful. For example, one officer said,

“I think working with the local authority is really key...there’s a lot to do with sex litter, and I think that sits firmly with local authority. You know, provide lighting, and blocking off those entrances to stairways, and putting up bollards ...making it environmentally safe...and a way more pleasant area. I think the police should be pushing back and saying what are you doing about it...The amount of times, you know, police will buy them [sex workers] a sandwich, but now outreach do it...but also give the police somewhere to refer the women to that will help with that childhood trauma, that drug addiction.” (PO22).

But the officer went on to add that in reality often these relationships do not exist because there are challenges, for example,

“There aren't the agencies for the police to refer to. When they [relationships] exist, I think they work really well, but unfortunately the agencies just aren't there...I think there needs to be a partnership between the agencies, the local authority, MOPAC...and the police, and then education...And then the agencies like, people like the ECP and NUMS,...They [these agencies] put themselves out, but there's just no funding. There's no funding for them to represent all of the women and men that need them.” (PO22)

The officer then went to describe the consequences of the lack of support for the police (oftentimes due to lack of resources) from other agencies,

“And so, I think what happens with the police is you get this kind of compassion fatigue. I know it where they just think, oh, yeah, again, it's us picking up the pieces when actually this is a public health issue, was a local authority issue. But now ‘let's bash the police’, so that fatigue comes in. And then that resentment” (PO22).

This perception was not shared by all officers, perhaps because amongst other factors, there are some gaps in police knowledge of how outreach and other stakeholder agencies are funded and organised. One officer felt,

“...if there was a charity they could do brothel visits, it would probably be better than [doing them] by myself, but then I am on a safer neighbourhood team and my team are really stretched so taking some of the work away would be great.... charities are generally sort of better trained, better paid. So they'd be more determined to get the results that they want” (PO12).

Most officers were complimentary and very positive about engagement with outreach services, except a couple of officers, one of whom (PO11) said that they did not have the time to invest in building relationships, especially since charities did not really have the money or resources to help sex workers. Interestingly, the other officer (PO9) who was critical of charities said that although they had worked with some charities who they thought had been good in offering help to sex workers, offering housing, job opportunities, support, and rehabilitation but said others were less willing to do anything tangible,

“We've got lots of organisations in this borough. Uh, the way I've view it is they get money from central government to do stuff which is filtered down to the Council, who then dish it out to various charities. And they, some of them, say 'yes, we're helping them. We're out there'. When I've looked at it at a local level, they're there, but they're not there. If that makes sense. So, one of the charities will stay nameless, they just drive around in the car. How is that helping anyone? What referral have you done? What work have you done with us? Nothing.” (PO9).

It was interesting to observe that this officer did not speak of making any effort to build rapport or a good working relationship with the agencies they were critical of. Whether police expect the agencies to make the first move or are proactive in building working relationships might be key to how these pan out. As one officer said,

“...just my experience with working with partner agencies in regards to sex work is that it takes a lot of effort to get anything set in stone or done or like I just feel like you're in a whirlwind of meetings and playing catch up. So, they're not really meetings. You're not discussing what you want to do in the future or what's been achieved or like setting up pathways, but [we are just] staying there. You seem to have the same meeting on repeat and it's really frustrating actually....” (PO18).

The same officer went on to say that it required a “huge effort working with partners” mainly because of the coordination required and adjusting to the requirements of different stakeholders, “some people want to come up to the police, others don't want police...you hear different things from each one and it's very hard to keep track of” (PO18). This was the only oblique reference to the fact that different outreach agencies might have different goals and objectives and balancing all of these priorities (and often politics) can be a tricky task for the police too.

When it was pointed out that perhaps stakeholders also found it difficult to build relationships with the police, mainly because officers get moved within a year or two years and it is “back to the drawing board” (PO24) for those agencies to rebuild relations with the new incumbent. Furthermore, there was a recognition that working with the police might be frustrating for partners as well because police working conditions are not conducive to nurturing partnerships. As this officer said,

“We work completely random hours, so then they're trying to get in contact with us and they don't get a reply for a week or because we're SNT. I'll get taken off my normal role left, right, and centre, and can't do anything for some time, periods of weeks on end. It can be frustrating, I understand” (PO18).

The stated reasons why two of the participants interviewed had never worked with outreach raise some concerns, because they indicate there weren't any mechanisms to ensure that these partnerships are set up and continue to work, as illustrated below.

“I'll be honest I've never ... obviously I was on SNT for about eight months. I had quite a busy ward and I've never really engaged with any outreach, personally I haven't...I'm sure there are units or wards that do engage with outreach, but it has not been known to me personally. When I was on the wards I didn't even know who they were if I'm honest, like how do I get in contact, who was the local person to contact?” (PO21).

The officer's perspective clearly indicated the lack of uniformity in how sex work was approached by local teams and BCUs.

Overall, most officers considered partnership work to be beneficial for several reasons, including providing 'immediate help and support', 'referral services', 'health services', 'counselling', and as mentioned above, 'dealing with community complaints of sex litter and “nuisance” brothels', 'establishing trust with the sex worker community', 'providing support for victims during their engagement with the criminal justice system', 'training student officers', safeguarding, and other welfare services.

We believe two of the most contentious areas in relation to which officers reported seeking help from outreach services were facilitating access to and support during brothel visits, and intelligence gathering. Working with outreach while interacting with sex workers in brothels can be problematic in our opinion, as indicated by interviews with other stakeholders in Chapter 3, despite what this officer said,

“...we would use them to go out on any proactive operations and it's... two-way communication obviously... without stepping on their toes or confidentiality and building their [outreach agencies'] own rapport [with sex workers]” (PO8).

A more problematic issue from our perspective was discerned from another officer's view,

“Just from the experience of the charity workers at that last brothel visit that we did – we said, ‘they need to come along with a visit as well because they’re [sex workers] more likely to talk to them as opposed to us’. I think, I suppose the police need to be there because we can be a little bit more forceful with finding out who these people [residents of the brothel] are getting their details and stuff, whereas they might not give that information to the charity workers... But I think the charity workers were invaluable, and maybe the police could go along as I don’t know, a bit of a safety thing for the charity workers.” (PO10)

The views expressed in this quote ring alarm bells for us, firstly because charity partners were being seen merely instrumentally useful to get sex workers to talk to the police and not as being intrinsically valued for the support and services they might provide. Of course, this is the perspective of officers, whether these services are viewed as valuable by sex workers is a different matter beyond the scope of this research. Secondly, the officer saw no issues in being “forceful” with sex workers to elicit information. Whilst this style of questioning might seem normal to police officers. Finally, it was not clear whether police accompanying outreach workers for their ‘protection’ was something the latter wanted and also whether the officer was aware that this could potentially have a negative impact on outreach-sex worker engagement.

Another officer suggested that if police were not to visit brothels, another way to gather intelligence was,

“If you can’t get access [to a brothel] as police because there is a low level of trust, you might ask for some feedback from NGOs that do have a good level of access to, say, look, should we be reassured that everything is OK and that premises, or do we need to worry? And then you use that information intelligence to start to build up a picture of where you think that trafficking might be taking place.” (PO5)

Whilst undoubtedly the officer thought this would be a less intrusive way to gather intelligence, such an expectation might put immense pressure on sex worker confidentiality and the relationships of trust these organisations had built up with sex workers. Although, some officers were sensitive to this tension,

“I’m very clear that they [other outreach services] should never tell us anything that breaches their own confidentiality, but we do need to know if there’s a risk situation or a danger of any harm to any person” (PO8).

Such an expectation might put even more pressure on outreach workers to make judgements about what might or might not be considered a ‘risky situation’. One officer recognised that often despite good relations with outreach organisations, they “don’t speak to us...and there is some serious stuff going on that is not reported” (PO19).

One participant said that one of the biggest challenges to good partnership working was that the police don’t work well in partnerships. This participant also stated that

there is poor communication between the senior leadership team (SLT) in the Met and local units, suggesting that even though there might be a strategic Met policy on partnership working in the area of sex work [they wouldn't know], it is not well communicated,

“Police aren't very good at working with agencies...The problem is 100% translating what we talk about at New Scotland Yard to the local borough area...the strategic leads in the boroughs...it is incumbent on the leads to be clear about what is happening, who are the services in your area, what pan-London organisation can you reach into and work with?...but they're just not” (PO6).

Another challenge was the fact that most relationships were driven by personalities and were not established in systems. As one officer identified,

“I think my experience is, you have some excellent relationships, but a lot of those are gonna be personality driven. Umm, so people like me? I've been around for a very long time. Some of our partners have been around for a long time. We kind of work comfortably and we know how that works. We know what needs to be done, but it's easy for someone to come in skew that completely. So, it just doesn't work anymore or just destroys everything good that has happened and that happens quite a lot...so yeah, personality driven, which is wrong” (PO17).

Similarly, whilst it is well known that many outreach organisations and services struggle with trusting the police, the feeling can be mutual, indicative of potential tension and misalignment of police and outreach organisations' values - as expressed by one officer,

“I've upset quite a few people by saying 'I'm not working with you because you haven't got that record. You haven't brought that success rate' ...And, you know, I've said it in the polite way, 'you're just getting the money for the sake of getting the money because you're a charity, right'? I want people that are going to actually help us in our local community...I joined the police service to help people not to massage people's egos” (PO9).

Thus, perceived lack of adequate resources in the outreach sector, inability of the police to work well in partnerships, the personality driven nature of partnerships, and logistical challenges in building and maintaining good relationships, and mutual distrust were cited as some of the major barriers to partnership working.

Missing from the discourse was any discussion of whether any factors governed the choice of which NGOs or outreach organisations the police were willing to work with. It was unclear whether they had a particular preference for organisations with specific philosophies, such as faith-based organisations and/or exit focused agencies. From the interviews it appeared as if the police worked without prejudice with any organisation that was willing to engage with them and provided some outreach services that they deemed useful, which we caution, may or may not be viewed similarly by sex workers themselves.



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## Challenges and suggestions for improving police responses

An assessment of the interview data revealed several challenges in policing in relation to sex work were identified by participants during the course of the discussions. Some of these challenges partially account for the poor record police have historically in their dealing with the sex worker community. These can be summarised as,

- Lack of resources and manpower arising out of unfilled vacant positions in SNTs and other specialist teams, frequent abstraction of officers on other duties, and lack of specialised teams with dedicated resources.
- Sex work being only one amongst several areas of responsibility for police officers, since the sex worker population is quite small and is very marginalised.
- Sex work not being considered a priority and not counting as a key performance indicator.
- Lack of clear 'ownership' of sex work either at local or strategic levels.
- Lack of policy guidelines and priorities at the local or strategic levels.
- Lack of knowledge and expertise in dealing appropriately with what were perceived as being a 'vulnerable' population.

What was notably absent in the interviews, and admittedly we did not bring it up, was police misconduct or violence, both, as clients and in responding to sex workers as victims of crime. The complete absence of any mention of these areas is indicative of either blissful ignorance (which seems a bit hard to imagine), or wilful denial (more understandable, given officers felt they were representing their organisation), or perhaps shame in accepting police misconduct. This is an area for further research, and contrasts sharply with the accounts from non-policing stakeholders (see Chapter 3).

Suggestions offered by officers when asked 'how could police response in this area be improved?' ranged from the prosaic to the profound and much else in between. Some officers (n=5) immediately focused on particular aspects of sex work, such as brothel closures, assisting 'exit' (i.e. helping people leave sex work), targeting criminals and crimes associated with sex work, better problem analysis through more joined up intelligence reports, and improving police image through improved communication with the target sex worker population. Whilst some of the latter suggestions were sensible, others were more problematic. An example of what we consider a sensible suggestion was based on a particular case narrated by one officer where their team had provided support and service to a victim who was a sex worker, to the latter's apparent satisfaction and felt that such positive stories should be communicated to encourage other victims to engage with the police.

"You know there's so much negativity now around the Met and how it deals with victims....But we don't report the positives like that story that police do listen, you know, and encourage people. Women, and men, are not going to come forward as

victims of nasty crimes like in the sex world if all they hear is that all cops are racist, misogynistic, sexist. We have to change the story behind and promote those stories, if that makes sense” (PO3).

However, some of the more problematic suggestions included closure of brothels because, in this officer’s opinion,

“I think we should be visiting every brothel and taking time to speak to the women there. They shouldn't be allowed to carry on because I think it impacts on neighbours and other people in the community... So, I think we should be closing them down. But the problem with that is, is there they just move on and go somewhere else. So it's a bit like whack-a-mole as in you get them out and then they go somewhere else” (PO10)

Another officer also advocated brothel closures, but their position was a tad less extreme, where they felt targeting brothels only because of the large amounts of money involved was “absolutely not a priority for me” (PO5) but if they were,

“...looking at other bits of organised crime that go alongside the sex work... drugs...firearms...people trafficking. Then I think inevitably you have to say proportionately, we have to do that [shutting down the brothel] because the risk more broadly to society and the communities is bigger than the impact on just the sex work community” (PO5).

The most popular suggestion made by participants (n=13) was allocating more resources in terms of manpower, in the form of specifically dedicated units as well as having a single point of contact at the local level in every borough. It was suggested that doing so would enable local teams to develop the knowledge and expertise required to respond to sex worker exploitation and victimisation, as well as the skills required to build and maintain relationships of trust with sex workers and other stakeholder communities.

Some of the more questionable solutions suggested by, albeit, a very small number of officers indicated that there was a need for greater sensitisation and better training for officers. Indeed, more training in how to understand and respond to sex work was itself identified as a need by eight officers and was the second most popular suggestion offered to improve police service, mainly because as this officer said,

“If you talk to a lot of my colleagues, lots of them won't know how to approach brothels, how to approach sex workers...don't have a clue about legislation...So I think it's gonna take a lot of a lot of training and a lot of overhaul of mindsets really” (PO1)

Training and education was advocated to:

- Improve knowledge legislation, sex work landscape, and change mindsets

- Hone expertise and skills for a specialist team dedicated to working on the organised crime and trafficking aspects of sex work (PO1)
- Train specialist units in tackling crimes related to sex work and crimes against sex workers (PO11)
- Empower officers and challenge their mind set to address crimes in against sex workers more sensitively (PO13)
- Improve understanding of the life of a sex worker and intersectionality (PO7, PO14).

It was heartening to see that officers did not just make a blanket and hackneyed recommendation of ‘more training’, but rather identified specific areas in which they thought more education and information to officers would be helpful.

Six officers suggested improved partnership work would be a way forward in building better relationships with sex worker communities and supporting outreach services in providing the services and facilities that sex workers needed.

Three officers mentioned the need for a change in legislation to legalise aspects of sex work that they thought would streamline the response to sex work. One officer (PO11) suggested that brothels ought to be legalised and that the police have more powers to proactively tackle organised criminals and controllers working in this space. Another officer suggested Amsterdam style ‘red light zones’ where brothels would be legal (PO21), alongside another suggestion from this officer,

“The UK would benefit from something like a Germany style system where there are streets where it is legal and you can do it and there are places that are monitored... It reduces the risk, you know, if there was a way of controlling or taxing it, using it as a revenue stream in a legal sense and then also creating a safe place where, not only from assaults and things like that but also from things like sexually transmitted diseases and everything...” (PO20)

A few officers talked about the importance of changing the mind-set of the police in order to change how they interact with and respond to sex work and sex workers.

Finally, there were some messages that could form the guiding principles of any sex work related policy that might be developed in the future.

“The key thing is not oversimplifying a hugely complex problem” (PO13)

“Stop viewing it [sex work] as something that could be solved instantaneously” (PO6)

“You are never going to stop it, you know, banning them from an area, enforcing, it’s not going to work” (PO21).

“When you change that mindset away from, ‘this is not a policing problem to solve’, and [something missing here – accept??] the fact that realistically, the only people

who are going to divert sex workers away from sex work is outreach. Then they become the most important part of the puzzle, not policing. So therefore, you got to do everything you can in order to enable them to do their work” (PO7).

It was encouraging to see that there were sensible voices calling for the police to stop and think about what they could and could not achieve in this field and what they should realistically accept as their responsibility towards sex workers and how they should go about conducting themselves in this area. The bottom line, we would argue, was succinctly expressed by one officer, “the Met need to start thinking differently about it” (PO9).

## Recommendations from Police Interviews

Based on the interviews with police officers - what officers said, what was left unsaid, and what we consider to be gaps - we make a few specific recommendations in this section. However, we will consider all the findings based on the two sets of interviews and make some overall recommendations at the end of Chapter 4.

- Clear policy and strategy to address sex work: establishing at London-wide and local borough level?? what the organisational goals are in the area of sex work, recognising proactive work that has been beneficial for sex workers and has served legitimate police aims of crime control undertaken by individuals and teams in this space, and agreeing priorities in terms of enforcement.
- More education and sensitisation on sex work to change mind sets and attitudes towards sex workers. Being aware of the dynamic nature of sex workers’ circumstances, guarding against stereotyping, being sensitive to the impact of intersectionality, the fluid nature of vulnerability, the complex quality of concepts like consent to sex work, and where the line is crossed over into exploitation.
- Rethink brothel visits, their purpose and aims, asking whether the police are the best agency to do ‘welfare visits’, under what circumstances should they be done, how they might impact on trust and confidence in the police, and how should officers conduct themselves during the course of a visit.
- Improve service to victims of crime who are sex workers, not just confined to rape and serious allegations – take a good hard look at current response offered to sex workers who are victims of crime and better supervision and oversight of cases involving sex workers where they are perceived to be vulnerable.
- Greater role of intelligence analysis - More joined up working and transparency in intelligence gathering and how it is analysed and acted upon.

- Rethink client-focused enforcement strategy, whether it actually reduces demand or displaces it, how it would put sex workers at greater risk, and whether it has a negative impact on police-sex worker relations.
- More consultation with community, including sex worker representatives in order to address some of the tensions and find better ways of doing so.

# Chapter 3: Learning from the perspectives and experiences of key stakeholders beyond policing

## Introduction

This part of the research explored other key stakeholders' perspectives on policing in London in relation to sex work, including trafficking of adults for sexual exploitation (but excluding commercial child sexual exploitation, as explained in Chapter 1).

The second author (Dr Ella Cockbain) conducted in-depth interviews with 18 key informants from across sex worker-led/by-and-for organisations, specialist healthcare services, and faith-based non-governmental organisations (NGOs). Their insights are vital in understanding how policing in relation to sex work in London is perceived by those who experience it, witness it, and/or support sex workers through the criminal justice process. As such, these interviews provide an important complement to the interviews with police officers (Chapter 2), enabling a fuller and more nuanced picture of how policing operates in this domain and its impacts on affected communities.

The overarching research question for this strand was: **'How is policing in London in relation to sex work perceived and experienced by key stakeholders outside of the police?'** We sought to understand views on current policing practices, their strengths and limitations, what constitutes good and bad practices, barriers and enablers to delivering better responses, and suggestions for improvements. We asked about policing in this space at large, as well as particular issues specific to policing both the off- and on-street markets and trafficking for sexual exploitation.

Overall, there were many commonalities in participants' views and experiences, alongside some notable variations and tensions. We identified eight main themes in the data, which were:

1. Intersectional marginalisation and its implications for policing
2. Widespread fear and mistrust
3. Inconsistency and unpredictability of policing
4. Positive aspects of policing in relation to sex work
5. The harmfulness of police 'welfare checks' and brothel raids
6. Other policing-related harms
7. Doing policing differently – less but better engagement
8. Calls for legal and policy changes to reduce policing-related harms.

## Methods

We took a qualitative approach, using semi-structured interviews to explore participants' perceptions and experiences in depth. We sampled purposively for key informants across a range of different organisations, all working directly with sex workers in London<sup>5</sup>. Broadly speaking, participants fell into three main groups: sex worker-led/by-and-for organisations (hereafter simply sex worker organisations, for brevity); specialist healthcare services; and faith-based organisations. The participation rate was very high, demonstrating support for this research.

In total, we interviewed 18 stakeholders: six from sex worker organisations; nine from healthcare; and three from faith-based NGOs. A list of participating organisations is provided below, with consent<sup>6</sup>.

- ECP (English Collective of Prostitutes)
- ESWA (European Sex Workers Rights Alliance)
- National Ugly Mugs (NUM)
- SWARM (Sex Worker Advocacy and Resistance Movement)
- Sex Workers Vocational Network
- Women against Rape
- Josephine Butler Society
- 56 Dean Street/Dean Street Express
- Ambrose King
- The Havens
- Open Doors
- SASH
- RAHAB UK
- The Salvation Army
- Streetlight

The interviews were loosely structured around experiences of policing in London, perceptions of current policing responses, their effectiveness and limitations, barriers to engagement and suggestions for improving responses. The interviews covered both on-and off-street work, as well as trafficking for sexual exploitation. Interviews took place between August 2023 and January 2024, and were one-on-one in all cases except one. Seven people were interviewed face-to-face and eleven online. Interviews lasted nearly an hour and a half on average, ranging from one to three hours. All were recorded and then transcribed verbatim. We used reflexive thematic analysis (Braun & Clarke, 2006, 2019) to analyse the data and identify key themes. While our focus is on common themes, we also highlight notable tensions or divergences.

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<sup>5</sup> We began by sampling from organisations on the Project Evergreen Advisory Group. We also recruited from organisations not represented there, particularly sex worker organisations, and used some snowball sampling.

<sup>6</sup> In a few organisations, we spoke to multiple people with complementary expertise. Some participants worked for multiple organisations. All agreed for at least one of their workplaces to be named here.

To protect confidentiality, we provide only a brief summary of the participants. Thirteen were (cis)women, three were (cis)men, one was gender-non-conforming, and one chose not to specify. They were aged 30 upwards the time of interview, with a median of 47.5 years<sup>7</sup>. All but two were born in the UK. Fifteen identified as white and three as various mixed ethnicities. They had worked in this field for an average (median) of 10.5 years (range roughly 4-38 years). Overall, participants had worked in a wide variety of roles and geographical locations, together spanning North, East, South, West and Central London. Some organisations were also active outside London, but our discussions focused on policing within the capital. Participants reported currently interacting primarily with cis-female sex workers, but most had also supported cis-male, trans and/or non-binary sex workers.

## Ethics

This project had low risk approval by the Research Ethics Committee of the Department of Security and Crime Science at UCL (reference 481). Our guiding principles included informed consent, confidentiality, and remuneration for participants' time and expertise<sup>8</sup>. To protect anonymity and confidentiality, we attribute most quotes to participants' chosen pseudonyms and redacted other potentially identifying information. We respected the request from ECP and Women Against Rape that their quotes be fully attributed.

## Limitations and mitigations

Time and budgetary constraints meant we could not interview individual sex workers, although they are the ultimate stakeholders here. Nevertheless, we tried to centre affected communities as much as possible, while also learning from other professionals. Our project advisory group involved academics with expertise on both policing and sex work (including lived experience). We also made a particular effort to interview sex worker organisations (some of which also have trafficking victims/survivors in them). Several participants had lived experience of sex working in London and some chose to draw on their personal experiences of policing too. We also benefitted greatly from ESWA sharing insights from a (then ongoing) major international study with sex workers about their experiences of policing (ESWA, 2024)<sup>9</sup>. While we sampled purposively, our findings of course do not represent *all* stakeholders' views and we cannot quantify the prevalence of policing practices identified here. The strength of a qualitative approach lies in enabling nuanced, in-

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<sup>7</sup> One chose not to specify their age.

<sup>8</sup> We offered participants a thank you payment of £75 or £150: with the higher payment for sex worker organisations only, in recognition of their more limited resources and the particular importance of their expertise. All participants could choose between taking payments personally, to their organisation, or as a donation to an organisation supporting sex workers.

<sup>9</sup> A pan-European study, including the UK, where peer researchers at the ECP conducted interviews. The full report is due to be published imminently and a policy brief is out already (ESWA, 2024).



depth explorations of a complex issue, not claims to generalisability. As with any interview-based study, there is potential for self-report bias.

## Results

We identified eight core themes, which we detail in turn. It is also important to recognise that there are interactions between these themes (e.g. intersectional marginalisation provides crucial context for fear and mistrust, which can in turn be increased by harmful policing practices).

### Intersectional marginalisation and its implications for policing

Originally coined by legal scholar Kimberlé Crenshaw in the context of discrimination cases at court (1989), intersectionality relates to how different aspects of people's individual identities (*e.g.* gender, race, class etc.) overlap in ways affecting how they are viewed and treated. For example, black women can be seen to be multiply marginalised compared to black men or white women. Notably, 16 of the 18 participants explained sex work in clearly intersectional terms, situating it within a web of social exclusion and discrimination. Relatedly, various participants emphasised that police need to understand that sex workers often come from populations with a history of "de facto being criminalised, being treated much more poorly than, for example, like white middle-class populations" (Charlie, sex worker organisation). These experiences were seen both to contextualise sex workers' expectations and experiences of policing and to necessitate broader-based changes if policing in relation to sex workers is to be improved, as illustrated below.

"They come from working class communities and their attitude towards the police is fixed because they have seen what the police have done within their community generally...that means that how the police treat other sectors of people is relevant to how they're going to ever police sex workers... so if the police are outrageously racist against migrant people generally and sexist against migrant women, then when migrant women come up against them, people have a whole experience already." – Niki Adams, ECP

As illustrated below, most participants described sex work as being driven above all by basic financial needs and a lack of viable alternatives.

"People need money, that's literally it. People need work. So many sex workers are disabled. So many sex workers are carers. Our benefit system is fucked. Like our social care is horrendous." – Isabelle, sex worker organisation

Factors said to push people into sex work, trap them there and compel them into riskier practices included benefit caps and sanctions, the cost-of-living crisis, student

debt, transphobia, and so-called 'Hostile Environment'<sup>10</sup> policies (e.g. not having recourse to public funds or the 'right to work').

Participants widely stressed that sex workers are not a homogenous population, noting numerous differences by geographical area in London and type of sex work. Several participants said that the street workers they supported often (or even invariably) had traumatic histories and complex and under-served needs, as illustrated below.

"We're talking about homelessness, substance misuse, mental health, trauma...bereavement, loss of children... into the care system over the years. They have experienced repeated abuse, domestic abuse in relationships, sexual violence...within relationships, from associates and from strangers, punters whilst they're working. Many of them have also experienced childhood neglect and childhood abuse growing up in families where there has been substance misuse and violence, etc." – Deborah, healthcare

Various participants characterised the support available to meet sex workers' basic needs using terms like "pathetic" (Niki Adams, ECP) and "bleak" (Charlie, sex worker organisation), as illustrated below. Only very few participants reported positive conditions locally.

"We used to have quite a few more dedicated members of the team that used to provide a service, that's gone, it's all cuts, isn't it. Just seems quite dire... It feels bleak, but I think a lot can be done, you just need a good few people that are dedicated to it, I think, and money". – Danielle, healthcare

Overall, intersecting forms of discrimination, marginalisation and criminalisation and chronically under-met needs were described as creating multiple layers of stigma that meant sex workers were "seen as a disposable person" in the eyes of police and others (Niki Adams, ECP).

## **Widespread fear and mistrust of the police**

Seventeen of the 18 participants described fear and/or mistrust as being *the* most fundamental barrier to sex workers reporting crimes against them to the police. Examples given ranged from sex workers simply being highly sceptical the police would be any help to being actively terrified of them. A key message from our participants was that sex workers often see the police as a source of danger and risk, not protection and support. Speaking of the threat of sexual and physical violence from the police towards sex workers, Charlie (sex worker organisation) said, "Even if

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<sup>10</sup> The term refers to policies designed to make life in the UK difficult for irregular migrants (see JCWI, nd). Coined by then Home Secretary Theresa May in 2012, it has since been officially renamed the 'Compliant Environment', despite punitive measures ramping up via the Illegal Migration Act 2023 and the Nationality and Borders Act 2022, for example.

it hasn't happened to them, there's this expectation that it's going to happen, which is quite bleak and quite chilling."

Many saw this fear and mistrust as rational and as produced and/or exacerbated by issues covered in other themes (e.g. inconsistency and unpredictability). Participants often described sex workers as being afraid that any engagement with the police could trigger poor treatment, criminalisation, and/or repercussions from other state agencies. Those with multiply marginalised identities were said to be particularly and understandably scared, again underscoring the importance and impacts of intersectionality. These points are illustrated below.

"You have no idea when you go to the police, as a woman, as a migrant, as a person of colour, as a sex worker, you have no idea what they are going to pass onto other people...for most people who occupy some of those identities, it is safer just not to." – Polly, sex worker organisation

"It's fear, fear that they're going to be arrested, they're going to be detained and that overrides their safety because they put up with things because they are more afraid of what the other consequences are." – Ruby, healthcare

Numerous participants (particularly from healthcare) described regularly having conversations with sex workers who had been victims of serious crimes who were very afraid of being criminalised if they reported to the police. Several described finding it frustrating and upsetting that they could not offer their service users concrete reassurances that the police would not take enforcement action against them (e.g. on grounds such as brothel keeping offences) even if they reported as victims. For example, in the quote below a healthcare worker describes her sense of hopelessness that there was not more she could do to make it safe for her patients to report sexual violence to the police.

"A lot of the patients leave the room, and I just feel like I haven't helped them or done anything for them ... At the moment...it gets a bit soulless." – Sharon, healthcare.

Migrant sex workers were almost unanimously described as being especially afraid of the police, particularly if their migration status was irregular or precarious (e.g. people on student visas or with ongoing asylum claims), as illustrated below. Even those with the legal 'right to work' in the UK, however, were said to be at risk, as sex work is not recognised by the state as a "valid form of labour" (Isabelle, sex worker organisation). Several participants suggested that both consenting migrant sex workers and trafficking victims could be additionally fearful of the police because of negative experiences of policing in their home countries.

"In general, what we've found is that there's a culture of fear. I would go so far as to say like a culture of terror, particularly for migrants, particularly for undocumented migrants, particularly for trans or LGBT people, especially for transwomen, and in terms of like an intersectional combination, for example, like

a migrant transwoman is living in real fear of the police.” – Charlie, sex worker organisation

Mothers/parents were another group often described as being particularly fearful of the police and other authorities, whose involvement the police could trigger. We were told that being known to be sex working could lead to being branded an unfit mother and risking having one’s children taken away. There was also a view that the police routinely and deliberately out sex workers to their families and communities “just to cause chaos and to terrorise people” (Niki Adams, ECP), which speaks both to a real lack of confidence in policing and very poor experiences among affected populations. Trans sex workers were also described as both particularly afraid of the police and especially likely to be treated badly by them. Less commonly, cis-male workers were also mentioned a few times as facing specific but distinct barriers to reporting, for example societal stereotypes that men should not be raped or should defend themselves. Some illustrative quotes are given below.

“It’s really horrendous, some of the treatment that trans women get in particular.”  
– Niki Adams, ECP

“I feel that for trans sex workers there’s a hell of a lot, I think there are more obstacles and barriers to reporting, especially if they’re also migrant... there’s a hell of a lot of disclosure. It could even be disclosure about your physical being and your genitalia... it’s quite a lot to actually explain when really all you want is to be supported because you’re a victim of crime.” – Stevie, healthcare

Numerous participants mentioned high-profile scandals<sup>11</sup> involving the MPS specifically or policing more generally. The negative publicity around, for example, police misconduct, criminality, institutional racism and other prejudices were said to have further increased sex workers’ (and others’) fear and mistrust, as illustrated below.

“Like, they don’t hear a lot of positive stories of police engagement with sex workers, you know especially with the Met. They hear things like those WhatsApps that came out where they talk about raping sex workers and raping women in general.” – Polly, sex worker organisation

Relatedly, several participants (all from sex worker organisations) spoke of their mistrust in policing as an institution, describing it as fundamentally “broken” (Isabelle), “rotten” (Polly), and “violent” (Charlie). Others varied in how critical (if at all) they were of policing at large, with some just attributing issues to “bad apples” (Julia, healthcare) or “rogue police officers” (Philippa, faith-based NGO) but others pointing to broader systemic and cultural problems within policing and society at large (including chronic underfunding elsewhere in the criminal justice system), as illustrated below.

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<sup>11</sup> Including in relation to Sarah Everard, Bibaa Henry and Nicole Smallman, Black Lives Matter, Operation Soteria Bluestone, the Casey Review of the MPS, and Stephen Port.

“The police as an institution are inherently violent, and like the question of whether or not that can be reformed...is a really important one to grapple with.” – Charlie, sex worker organisation

“Anybody being raped...if a client came I would say, look, I don’t know how to say this but this could go for years, in my experience. it’s like keeping a wound open for years.” – JV, healthcare

In some cases, participants described more positive experiences of how local police in particular had been able to build up trust with sex working populations (and with other services themselves) by taking a more hands-off, less punitive approach. As illustrated below, here the point was around particular officers or teams being able to build trust, rather than police as an institution at large. “This particular team, we trust to get right, and we know that they will follow through”. – Susan, faith-based NGO

## **The inconsistency and unpredictability of policing in relation to sex work**

Thirteen of the 18 participants identified inconsistency and unpredictability of policing in this space as a major concern. A key issue here was the sex work legislation itself, described variously as “antiquated” (Mary, faith-based NGO), “deliberately very, very confusing” (Isabelle, sex worker organisation), “draconian” and “unjust” (Niki Adams, ECP). Certain offences were characterised as particularly problematic because of their vagueness and expansiveness (e.g., brothel keeping and controlling). Coupled with the unpredictability of whether and how police exercise discretion, that reportedly enabled hard-to-anticipate and seemingly arbitrary enactment of police powers against sex workers and their associates, as illustrated below.

“Because the prostitution laws are very draconian, they give the police massive discretionary powers which the police then abuse.” – Niki Adams, ECP

“Policing strategies against sex work aren’t applied evenly across the country. So, it is very difficult as a sex worker to know what you are going to be getting.” – Polly, sex worker organisation

Although many participants were positive about the new NPCC guidance on sex work, they also stressed that having guidance does not mean it is known or implemented consistently. It is also worth noting that there is no obligation to comply with this guidance.

“I know that they’ve got guidance. They don’t always follow it.” – Gary, healthcare  
“When you actually get down at a borough level... to being out with a Safer Neighbourhood Team officer, or talking to CID or the Sapphire Unit<sup>12</sup>, they are oblivious to this good practice.” – Mary, faith-based NGO

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<sup>12</sup> Although the Sapphire Unit (the MPS’s specialist centralised rape investigation unit) no longer exists, the term was still used by several participants still in reference to specialist teams dealing with rape

Reinforcing the apparent inconsistency and unpredictability of policing in this domain, most participants spoke of mixed experiences. For some, that meant both positive and negative experiences, for others vaguely neutral at best to negative. Worryingly, but unsurprisingly, participants from sex worker organisations typically fell into the latter category, as illustrated below.

“I’ve had experiences that have not been horrendous, you know, but they’ve been like benign, neutral. I’ve never had an experience with the police where I’ve come out of it and gone like, ‘Wow, this has really improved my trust with the police’.” – Isabelle, sex worker organisation

Participants’ views and experiences varied considerably in terms of different geographical areas, teams and points in time. Some felt largely fortunate locally, but pointed to neighbouring boroughs where approaches were much harsher. Others highlighted further unpredictability that arose where neighbourhood-level policing was relatively hands-off but then a major operation could shatter fragile relations between police and sex workers:

“A typical scenario would be where you’ve got good local policing and police officers are not closing down brothels or harassing women on the street. Then you get like an operation... It could be like a sort of crackdown, all these big words...Trust disappears, people don’t want to come forward to report crime.” – Stevie, healthcare

Inconsistency and unpredictability were highlighted as problematic not only in relation to enforcement action but also responses to sex workers who had been victims of crime (see below). That was said to undermine sex workers’ willingness to report or pursue allegations further if they had bad initial experiences upon reporting.

“It’s really different, the approach from the police is quite different depending on who you see, which police station you attend, which borough you’re in.” – Deborah, healthcare

Turnover within policing was also said to fuel inconsistency and unpredictability, affecting trust, introducing yet more uncertainty, and impeding attempts to build and maintain partnerships. As detailed below, that was described as impacting not only individual sex workers’ relationships with police but also those of outside organisations.

“There are sex workers who like the police and are fine with the police that they know... but again that kind of arbitrary distinction between, you can have one really nice cop and then he can retire, and then his replacement is an obnoxious guy.” – Charlie, sex worker organisation

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(which should now fall under BCU Safeguarding Hubs and be dealt with by Sexual Offences Investigative Techniques (SOIT) trained officers).

“You would have someone and then they would move on and then you would have to build that trust again and that’s quite difficult within the Met.” – Ruby, healthcare

Notably, sex worker liaison officers (or LGBTQ+ liaison officers) were only rarely mentioned and here views diverged on their utility: *e.g.*, one person described positive experiences, another said they needed to be deployed more widely, and a third suggested police should not have dedicated funding for sex worker liaison officers since “those types of roles are already being done by those that are grass roots...that are doing a really good job at it” (Sarah, sex worker organisation). That participant, however, did stress the importance of having single points of contact within policing (a common argument that we heard, discussed in more detail later).

Migrant sex workers were widely described as facing particular insecurities because of the additional inconsistency and unpredictability around whether and to what extent police collaborate with Immigration Enforcement (see also Chapter 2). That could be, we were told, through joint enforcement activity between police and Immigration Enforcement (*e.g.* on anti-trafficking raids) or onward data sharing from police to Immigration Enforcement. Many participants described being unsure themselves about the extent to which those things happened in practice – “and it’s often denied” (Stevie, healthcare). As illustrated below, some said that the police routinely worked with Immigration Enforcement, whereas others pointed to past patterns or more isolated incidents only. The accounts from Niki at ECP were particularly bleak, potentially indicating a long-shadow cast by poor practices and/or exposure to more negative situations than most participants.

“Nearly all migrant sex workers, when they get raided, they get raided with police and Immigration or there’s a very classic kind of procedure where the police come in... they give you a questionnaire, “Are you trafficked?” you say, “No”, the police leave and come back with Immigration and deport the women. Or they just come in with Immigration. I mean, they usually always used to come in with Immigration.” – Niki Adams, ECP

“We’d seen them take Immigration out and sweep the place out. We’d seen them offer dispersal orders. We’d seen them...go up to people, calling people names. We’d heard it all and we were not trusting of the police on the ground.” – Susan, faith-based NGO

Several participants from different types of organisation described the period around Brexit as having been particularly bad in terms of police (nationally but especially in London) targeting migrant sex workers for arrest, prosecution and harassment. Examples given included harassing EU workers, confiscating their IDs, demanding they left the country and threatening to out them to their families. Since the Nationality and Borders Act 2022, Niki Adams (ECP) reported encountering similar tactics starting up of late where “the police deliberately targeting a woman and just arresting her over and over again so it looks like she’s a serial offender”. While sex workers (like anyone) can of course commit offences that may require a police response, the main point

here was that the breadth of existing sex-work-related laws give the police a legal basis to target sex workers punitively should they so decide (whatever the guidance may say to the contrary).

## **Positive aspects of policing in relation to sex work**

Ten of the 18 participants highlighted positive experiences of various relationships they had with police and/or aspects of policing practices. Overall, there were six main commonalities in what was seen as positive in policing in relation to sex work.

First, many participants praised good partnership work between police and outside agencies, as illustrated below. That was often linked to individual officers or teams that they saw as receptive, non-judgmental, keen to listen to outside organisations, and act on their concerns and recommendations seriously, as illustrated below.

“There are lots of really good officers that...are trying to make changes and are really helpful when we have lots of questions about why things ain’t working the way we think they should or where we’ve got a case where something happens that doesn’t seem quite right, and we’ll contact somebody and they’ll take it all the way back and see what the barrier is, what’s the problem and try to overcome that.” – Gary, healthcare

“There is excellent partnership work. And when it works well, it’s phenomenal to see the outcomes for everybody and for every agency that’s involved within it.” – Mary, faith-based NGO

Second, various participants reported having had much more positive experiences with certain categories of officers. Generally, they were more positive about either particular neighbourhood teams or specialist SOIT<sup>13</sup> (Sexual Offences Investigation Trained) officers. Relatedly, many participants were positive about situations where sex workers were enabled to speak directly to particular officers before deciding whether to report crimes formally, which speaks to the perceived value of stable single points of contact (SPOC) for sex work (discussed in more detail later), as shown in the quotes below. That reportedly gave them the chance to talk to someone knowledgeable and, in some cases, vouched for by a support worker they trust, and discuss risks and concerns without feeling pressured to report.

“I think the thing that's made it really positive for us is the partnership working between sex worker services and the particular unit that investigates rape and sexual violence.” – Deborah, healthcare

“You could have a first initial conversation with an officer to ask them the questions that you want to and to see what they have to say to you...But ... frequently there isn’t that resource, and we’re just told to go to the front desk or to report it online,

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<sup>13</sup> There were, however, also some accounts of poor practice among SOITs.



and then that feels much more concerning around all the other vulnerabilities that are there with immigration.” – Mary, faith-based NGO

Third, various participants praised incidents where there had been a supportive approach to victims and good case handling through the criminal justice system (see example below). That was raised in particular in relation to sex workers who had been victimised, but also (although less commonly) people who had been trafficked for sexual exploitation. Positives cited here included good communication, respect, accommodations for people’s particular needs (e.g. in case of substance dependencies) and police giving (and upholding) reassurances that a victim’s irregular migration status would not become a focus.

“Most of our cases that have gone through the criminal justice system give really, really good feedback on how they have been treated by the police.” – Deborah, healthcare

Tellingly, however, various comments further underlined the idea of a very low bar for policing in relation to sex workers. For example, one participant caveated accounts of positive experiences with phrases like “I wish it wouldn’t feel like amazing in my world. I wish it felt normal” and “But I shouldn’t feel like that’s special... why am I impressed that they chose to focus on the victim?” (Susan, faith-based NGO).

Fourth, a few participants reported positive experiences with an individualised, approach from police towards working with outside agencies supporting people in the sex industry. For example, Ruby (healthcare) described instances in which the police were “creative” in how they sought to extract people from dangerous or harmful positions – with their consent and knowledge but without it looking like they had sought help from the police. These dynamics are illustrated below.

“Many of them weren’t being trafficked. But for those that were... when we had good relationships with the police...we would organise fake raids, so that we could help someone get out...it would look like they’re doing the whole place but then they would get them out and that was again something that we negotiated with them. And it worked really well because then it still kept their anonymity, so these people [traffickers] didn’t think that they themselves reported.” – Ruby, healthcare

Fifth, several participants described feeling fortunate to have seen a shift locally away from “harsh” (Deborah, healthcare) enforcement against street sex workers towards a more hands-off approach designed to reduce their criminalisation, as shown below. They said that had perceptibly reduced fear in the police locally, improved trust for both sex workers and other agencies and helped reorient focus towards non-policing agencies working to meet sex workers’ needs (e.g. re homelessness, drugs, mental health, and sexual health services).

“The women we meet... will often say, “Can you tell the police this has happened?”. They don’t run now if the police were to come up to them and say, “How are you doing?” ... So, that trust build is incredible.” – Susan, faith-based NGO

“They're listening. They're actually following the NPCC guidelines, which is really good.” – Deborah, healthcare

Sixth, some participants were very positive about the work of Operation Evergreen and related initiatives, such as the MPS Sex Worker Advisory Group (SWAG), seeing benefits as follows.

“Even the fact that Operation Evergreen exists is probably an addition...it meant going, ‘Actually, we are not good. We know that sex workers who are victims of crime are underreported’.” – Susan, faith-based NGO

“You're able to give feedback, discuss some of the challenges, discuss some of the barriers with those that are quite higher up in the organisation, in the hope that there are changes and developments going forward.” – Deborah, healthcare

Others, however, had not had contact with Operation Evergreen, did not mention it or were sceptical about the level of commitment to improving policing in relation to sex work in London.

Although 10 of the 18 participants had something positive to say about policing in relation to sex work and trafficking for sexual exploitation, these positive aspects were virtually never seen as the norm across boroughs, roles, and time periods.

The exception here was just three participants who were overwhelmingly positive about their overall experiences with the MPS in relation to sex work. There are various possible explanations for these outlier views, some of which could be interrelated. First, they might genuinely have been exposed to fewer instances of police misconduct and poor practices. Second, they might have different perspectives than others did on what constitutes bad or unacceptable policing practices. Third, their values, interests and aims might be more closely aligned with those of the police: all three were unusually although not unique in our sample for working very closely with the police.

In contrast, only one participant from a sex worker organisation highlighted *any* actively positive experiences with the MPS at all (as opposed to simply noting behaviour that met a low bar of basic professionalism or treating sex workers humanely). Even then, it was as part of a bleak overall outlook, that was common to participants from other sex worker organisations. Particularly within a partially criminalised landscape, it is hardly surprising that those from sex worker organisations typically (not always) seemed to have a more combative or avoidant relationship with the police and tended to express views and values that do not align with policing goals or norms. Indeed, two explicitly described themselves as policing abolitionists, and one of them noted that that is a fairly common view among sex workers. That could present a challenge if police wish to try and improve relationships with sex workers and their organisations, but that it should certainly not be used as an excuse not to try or to dismiss their lived experiences of policing-related harms.

“I am coming at it from a really specific awareness and understanding where I don’t believe the police can do a good job in their current form. So, I think obviously that does inform all of my answers around it.” – Polly, sex worker organisation

“I think this kind of interview is difficult because I personally like do not believe that the police can be reformed. I feel quite critical about the police as an institution. But I do recognise that there are sex workers who do want the police, or they want an institution, again, like I said, that they can turn to.” – Charlie, sex worker organisation

## **The harmfulness of police ‘welfare checks’ and brothel raids**

Two thirds of participants described police visits to sex working premises<sup>14</sup> in general as problematic and harmful. Participants from sex worker organisations were particularly critical, associating these interventions with physical, psychological, sexual, and economic violence. That is illustrated below. They also saw them as prurient, an important and unsettling point that was not mentioned by participants less directly involved in the communities affected (let alone by police participants – see Chapter 2).

“Some of my friends who’ve been through brothel raids say that it’s been worse than times that they were raped. Like it’s been so horrific and humiliating.” – Isabelle, sex worker organisation

“They come in like all guns blazing, guns in people’s faces, screaming, ‘Shut the fuck up, shut the fuck up, shut the fuck up,’ calling people whores, like pushing them around, like aggressive. Throwing them on the floor in their underwear and aggressively handcuffing them... and there’s a sexualised element to this violence, which is really cruel.” – Charlie, sex worker organisation

“The people that I know who have had welfare checks made on them, the police will often contact them, pretend to be a client, and then like do a booking, and obviously they’ll turn down other work...I know people who the police officer has had sex with them anyway and not paid them.” – Isabelle, sex worker organisation

Despite raids being seen as more overtly violent, both checks and raids were said to be “along the same continuum” (Charlie, sex worker organisation), especially for migrant workers. There were several reasons why the lines might blur in practice. Those included reports of ‘welfare checks’ frequently being used to threaten closures if people do not move on, sparking fears and/or experiences of recriminations from state agencies, and being used for intelligence-gathering that forms the groundwork for subsequent raids. Notably, using checks as a backdoor to gather intelligence was both criticised by various participants from sex worker organisations and praised by one participant from a faith-based NGO. This divergence of views shows how the same

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<sup>14</sup> ‘Premises’ refers here to both managed premises (i.e. brothels in the common-sense meaning) and any location with two or more people sex working together (also brothels in legal terms).

activity could be interpreted differently, depending on whether someone is cautious and critical about the risks of police engagement or effectively sees the police as a benevolent force.

Several participants criticised how the framing of sex workers as ‘vulnerable’ and associated focus on ‘safeguarding’ enables and justifies police intrusion. Numerous participants pushed back on the notion the police should be doing ‘welfare checks’ at all, seeing them as ill-trusted and poorly positioned to do so, as the quotes below show. Here, participants also noted a particular irony when the police involved are themselves clients there (views on the new policy against police being clients are discussed later).

“Because of the culture of fear around it, I think welfare checks being done by police feels like a bit of an oxymoron really, particularly for the sex working community.” – Charlie, sex worker organisation

“Half the time, these officers are clients of the brothel as well. Like they go in there one week and then their sergeant suddenly decides the next week like, ‘Oh, you’ve got to raid the place,’ and it’ll be the same officers.” – Isabelle, sex worker organisation

Although participants from sex worker organisations criticised checks and raids most heavily, others (especially from healthcare) voiced similar concerns about their intrusiveness, apparent ineffectiveness and detrimental impacts. Ironically, checks and raids were widely described as actually making sex workers *more* precarious and *more* vulnerable to crimes and other harms. The reported impacts included traumatising them, publicly identifying locations as sex work premises, outing workers, sparking evictions and closures, making workers poorer, causing displacement and consequently, making outreach services (e.g. sexual health) lose access to workers. Even the fear of checks/raids alone was sometimes said to lead to less safe and/or more exploitative labour conditions (e.g. brothel management using the risk of liability on brothel keeping charges they were shouldering to justify inflated charges to workers for utilities). Such points are highlighted below.

“A lot of these things are in the news... they’re in local newspapers and things. You’ve got predatory people who will seek out and then go to those places, knowing that the relationships with the police are completely broken.” – Sarah, sex worker organisation

“They [the MPS] really cut down on the prosecutions and instead they were going in and doing this thing, ‘Unless you’re closed down within three days we’re going to prosecute.’ Everybody was on the move... it’s really serious to be on the move in terms of safety because it means the CCTV you invested in you can’t invest in it again, the security gate, the person that you had on the end of the phone is now being threatened with being done for controlling... all your security systems are completely dismantled.” – Niki Adams, ECP

We asked participants what they saw as the main function of police checks and raids. The perceived drivers cited included box ticking, the optics of doing something, easy options for enforcement, gathering intelligence, wanting to intimidate, dominate or humiliate sex workers, and/or take their money (see examples below). Notably, only a tiny minority of participants saw checks and raids as mostly driven by intelligence or reports of serious crimes, genuine welfare concerns, or even complaints of ‘anti-social behaviour’, highlighting a general lack of perceived legitimacy.

“It’s gathering, it’s scoping, and it’s a way to show dominance over, and it’s a way of them saying, “We’re here,” and it’s to frighten.” – Sarah, sex worker organisation

“I feel that really the reasons for police going to brothel visits can often perhaps be more about even a tick box exercise. It is quite an easy win. It’s the law, the law works against sex workers.” – Stevie, healthcare

Participants from sex worker organisations suggested that an increased focus on human trafficking/‘modern slavery’ was (ab)used to legitimise checks/raids. Tellingly, several healthcare participants also gave concrete examples of police proposing and/or enacting ‘welfare checks’ speculatively, so as to ‘do something’ and perhaps find some trafficking along the way. Some participants also reported migrant workers feeling pressurised to say they were trafficked, effectively as a way of try to avoid criminalisation on sex work- or migration-related offences. There was also cynicism, particularly from sex worker organisations, of perceived police spin: whereby ineffective checks and raids were presented in the media as anti-trafficking successes. These issues are illustrated below.

“It gives the police a justification because they are doing like a moral good. I think that has enabled a more violent and aggressive policing strategy under this like justification.” – Polly, sex worker organisation

“They’ll get people to incriminate each other or themselves, or put people in the position where the only way that they’ll avoid being criminalised themselves is to be like, ‘Yes, I am a victim of trafficking’,” – Isabelle, sex worker organisation

Two participants referred to the same concerning examples (reported in the ESWA-led research project) of police removing sex workers from premises and taking them to what were referred to as “detention centres”, from which the police then “dumped [them] literally in the middle of the night out in the middle of nowhere and without any money to make their own way home...talk about leaving you vulnerable to rape” (Niki Adams, ECP). Although not explicitly stated, these accounts sound a lot like the collateral damage of ill-conceived and/or badly-executed anti-trafficking ‘rescues’ and ‘reception centres’<sup>15</sup>, to which those flagged as potential victims were taken.

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<sup>15</sup> To clarify, reception centres are used in anti-trafficking investigations, for example where there is a coordinated day of police enforcement action, suspects are arrested, and suspected victims are taken to a third-party location where partner agencies (e.g. health, NGOs) are present to assess and address immediate needs (e.g., health checks, providing food). The theory behind this type of intervention is that people who have been exploited are better able to disclose away from exploiters and trafficking

Relatedly, but this time in the context of street sex workers, a third participant described an encounter with an officer who suggested a reception centre (here she did use the specific term) as a way primarily of responding to pressures to displace street sex workers but speculatively also perhaps find some people who had been trafficked. While she said she was able to dissuade the officer from doing so, this example also raises concerns that reception centres might be being used in other cases on a flimsy and speculative basis.

“A good few years ago, the inspector was like, ‘I’m under pressure to move them on, what if I did a reception centre?’... They essentially wanted to pull them all in and then work out if any of them were trafficked, and then lead them all out again... it’s just like, ‘Well, maybe we’ll find the victims of trafficking then’.” – Susan, faith-based NGO

Returning to ‘welfare checks’, participants challenged what they saw as an underpinning assumption among police (and agencies partnering on this activity) that these interventions could facilitate meaningful conversations around exploitation. They said that was unrealistic given the fear, mistrust and inappropriateness of putting people on the spot in any workplace to discuss their labour conditions. These points, illustrated in below, clash with the views of those partnering with police on joint checks (discussed shortly).

“I think that imagining that sex workers in a brothel are going to open up to a random police officer who turns up, or police liaison who turns up, or a nun who turns up, about problems they are having at work, is insane. I think to do that you need to build a huge amount of trust, and the Met especially do not have that trust.” – Polly, sex worker organisation

Participants from across a variety of types of organisations described the Soho raids (of 2013 and 2016) as casting a particularly long shadow for both individual sex workers and their communities and organisations. We were told how these raids followed from months of ‘welfare checks’ (also involving an NGO ostensibly doing outreach), that they were particularly violent and degrading, and that they resulted in sex workers’ images being splashed over the papers and sex workers being detained and facing deportation threats. The counter-productive impacts in terms of destroying trust are underlined below. Here, a main point was that sex workers not already cynical about the police reportedly felt betrayed by the pretext of ‘welfare checks’ being used to build a case for closures. Similar critiques were levied by another participant (from a faith-based NGO), who saw the NGO involved as having abused workers’ trust to gather intelligence that was then used against them.

“Not that sex workers had much trust. But...if you wanted to build trust that was exactly *not* the thing to do because what the police did in the run-up to those, which is why everybody’s so suspicious of them now, is that for eighteen months they went in on welfare visits, sat and chatted and had cups of tea with women...chat,

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locations and once their immediate needs are met, but concerns have been raised elsewhere about tensions in their use in practice (British Red Cross, 2020).

chat, chat, chat, chat, and so by the time they went into court with the Closure Orders they had a dossier on each woman and each flat.” – Niki Adams, ECP

Most participants were particularly critical of how the police (at least sometimes) bring Immigration Enforcement on checks/raids or pass workers’ details to them. Even knowing that might happen was said to terrify migrant workers to the extent of actively fleeing police, as the following quote shows. Participants who had themselves gone out with police on checks and/or raids (either routinely or occasionally), also highlighted concrete examples of joint police activity with Immigration Enforcement, up to the present day. For example, we were told by one person of an upcoming anti-trafficking raid that would involve Immigration Enforcement and another spoke of a case in which the police passed information gathered via ‘welfare checks’ to Immigration Enforcement, apparently to help them meet their targets for removal.

“That happens quite a lot. Some forces are a bit more resistant to it, ‘cos they do at least recognise that like adding Immigration on as well like makes it even worse... And yeah, like I know that when police turn up to brothels, often like the migrant workers will just like jump out the fucking window... Like they will just leg it.” – Isabelle, sex worker organisation

The main critique of police checks and raids done with outside services (e.g. NGOs) was that it destroys trust among sex workers in other services. Numerous healthcare participants said they had been asked by police to do such joint activity and had refused, seeing an obvious conflict of interest with their own values, aims and roles (e.g. harm reduction goals, having the trust of sex workers). Interestingly, one participant who had themselves volunteered to go along on raids (“not to attack the sex workers, but to be in a neutral place outside” – JV, healthcare) was similarly critical of organisations that do outreach with the police, as shown below. Another said they had gone out on a joint check just the once and a year on still “never got to build the trust relationship with the off-street workers, because they just were assuming that we were police” (Susan, faith-based NGO).

“They want to go with the police but knock on the door, say “I’m coming to help you”. They’re going to get the door slammed in their faces, because as if what kind of help [are] you giving me, by bringing the police in front of my house.” – JV, Healthcare

Conversely, there were two participants who were themselves involved in regular joint checks and raids (or “operations”, as they both put it) with police. Both were from faith-based NGOs. They stressed the benefits of this type of collaboration in accessing premises, having police protection, and getting an initial contact with many people selling sex – including those said to be otherwise hard-to-access and not in contact with other services. Both said that could build into longer-term relationships and support provision, seen as a major benefit.

Of the two who regularly supported police on such joint activity, one had mixed views on doing so. She reflected on ethical and practical tensions involved, and described

both positive and negative experiences, saying sometimes it had worked “phenomenally” and at others had not built “confidence in the police” (Mary, faith-based NGO). Reminiscent others’ critiques of the prurient nature of checks/raids, she also problematised how she thought sometimes officers use their “position of power and privilege” in ways that “probably even subconsciously... kind of replicates what happens within a domestic abuse situation”. She described thinking, on balance, that it was better for her organisation to accompany the police – so as to discourage police misconduct by their presence and challenge it when witnessed:

“The police are going to visit flats anyway. They’re going to go. So, do you want them to go alone and behave without a third party being present? Isn’t that awful, but that’s how I feel. For some officers, they will behave differently if we are there, and I would rather women had the gold standard visit than something else.” – Mary, faith-based NGO

In contrast, the second participant regularly involved in such joint NGO-police activity was overwhelmingly positive about it. Describing the activity as “mutually beneficial”, she said benefits to the police included that a “non-threatening” NGO presence helps police gain entry without warrants, the NGO gets “really valuable intelligence” and the “women will open up and trust us, whereas they won’t trust the police” (Philippa, faith-based NGO). She reported being unsure how often the police in London actually involve Immigration Enforcement in policing the sex industry, and suggested it was a bad idea in anti-trafficking activity: “the last thing that person’s going to need is to feel that they’re going to be shipped back home ...[when] they clearly have been trafficked”. Despite these concerns, an example she gave of a forthcoming joint operation showed that the NGO was prepared to go out jointly with police even when Immigration Enforcement would also be present.

It is easy to see why doing joint interventions with NGOs would be appealing to the police and serve their interests. At the same time, the accounts detailed above help explain (and reinforce) why many other participants were so suspicious of these joint police-NGO interventions. Numerous participants – from across healthcare and sex worker-led organisations – were highly critical of organisations who do such joint checks and raids with the police, describing it as the domain of “religious”, “exiting” and/or “anti-trafficking” organisations<sup>16</sup>. Some suggested the latter’s involvement acted as a shield to legitimise police intrusion:

“I think it gives off an air of respectability to what they are doing. It attempts to give sort of credence to this idea of like a welfare check.” – Polly, sex worker organisation

A few healthcare participants suggested it could be helpful to have other non-policing organisations present at checks/raids (even while strongly rejecting doing it

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<sup>16</sup> This was not a blanket criticism of all involvement of religious organisations around sex workers. For example, some participants noted there were also some ‘nice nuns, you know, who the women actually like’ (Niki), various parishes with ‘incredible outreach work’ (Polly) etc. The critique here was very much focused on police-NGO active collaboration and the idea of sex workers needing ‘rescue’.



themselves because of the risk of losing the hard-won trust of those they support). Many others – particularly but not exclusively from sex worker organisations – were firmly of the view that the police should not be doing ‘welfare checks’ at all – either with or without services’ involvement. While there was evidently no absolute consensus, the overall balance among participants was that ‘welfare checks’ should be left to non-policing organisations (views varied on who should do this role, e.g. healthcare, NGOs, or sex worker-led organisations, and questions of resourcing were beyond scope). The predominant view overall was also that checks and raids can both cause numerous negative ramifications for sex workers.

## Other policing-related harms

A majority of participants (13, of which 10 expressed their feelings very strongly) described numerous other ways in which policing practices in London can harm sex workers. Some participants saw misconduct and abuse of power and process as endemic or particularly pronounced in certain areas of London:

“[In redacted area] the harassment from police is truly unbelievable, even if it’s not sexual harassment itself, a general kind of just, yeah, being taunted, being humiliated, being mocked, overlooking violence done to them.” – Charlie, SWO

There were three main categories of harm identified, addressed in turn: police abuses of sex workers as clients, poor treatment of sex workers as victims of crime, and harms relating to enforcement. The first two can be seen as involving explicit misdeeds (*e.g.* police committing crimes against sex workers, mistreatment of victims, failure to follow basic standards for evidence-collection) that should be avoided at all costs. We use the term misdeeds to capture the breadth of activity in this category, not in any way to downplay the very real criminality and overt misconduct illustrated in some of the examples. The latter relates instead to activity within what is sometimes known as the ‘lawful but awful’ category: *i.e.* acts that are arguably potentially permissible within current laws (although they can breach NPCC policy) are clearly inadvisable and far better avoided. Various detailed examples of specific instances involving police-perpetrated harms towards sex workers were given - too numerous to recount them all here.

Starting with the category of police misdeeds, many participants emphasised harms linked to police as clients of sex workers. Here, participants stressed issues arising from power imbalances, abuse of power, lack of accountability and conflicts of interests, as detailed in the quote below. The recent policy change banning police from having sex with sex workers was mentioned a few times and largely positively, although there was no indication given of any improvements thus far.

“Many sex workers see police as clients. Police come to them as clients, either as entrapment – so, they will procure services and then arrest them, which is just a truly disgraceful form of sexual violence and fundamental dehumanisation. Or the police officers will be clients themselves and then blackmail them, say like, “If you

don't give me services for free, I'm going to arrest you." What's a sex worker to do? Or the police will come as an off-duty client and they won't do anything, but, you know, they might go to a massage parlour one week and then the next week they'll be raiding that same massage parlour." – Charlie, sex worker organisation

Focusing now on sex workers as victims of crime, most participants stressed that very few such crimes get reported to the police in the first place. With rare exceptions, the general perception among participants was that police are less likely to 'believe' sex workers (i.e., take their allegations seriously) and treat them with decency and respect:

"A lot of people who have reported incidents of crime through the Met have been treated in a way that has made them feel that their case is less valued and less important. It's that, 'Well, you know, you chose to do that line of work, so what did you expect?'" – Sarah, sex worker organisation

"They were so rude and so like demeaning to myself and all of the other sex workers who spoke to them. And it was like they just believed that, because we're all hookers, we can't know anything. We're just like dumb prossies." – Isabelle, sex worker organisation

Sex workers who did come into contact with the police as victims were said often to face numerous issues. Examples included victim blaming, being intimidated, treated judgmentally, subjected to racism, xenophobia, transphobia, homophobia and/or misogyny, treated as criminals, threatened, enforced against, outed to family, friends, neighbours etc., subject to physical, sexual and/or psychological abuse, or simply just not afforded basic compassion and respect.

One particularly shocking example came from the then ongoing ESWA-led research project (ESWA, 2024). We were told by the ESWA participant about a "vulnerable trans sex worker" in London in their study. They explained how she described having been "stabbed and nearly killed" by a violent client. Her neighbour called the police, who then attended. The client claimed the victim and her friend had tried to rob him and so, despite the victim's obvious injury and distress, the police treated the workers as offenders. Worse still, they said, one of the attending officers had then gone back to do a 'welfare check' and attempted to rape her<sup>17</sup>. Other examples of extreme harms included accounts of an officer driving past and ignoring a sex worker being violently assaulted in the street.

We were also told of numerous examples of police failing to collect key evidence, put basic protective mechanisms in place for victims or generally acting in ways that compounded victims' fear, trauma and risk of further harm (including in cases of rapes, coercive control, domestic violence and/or threat to life). Particular issues were also raised linked to mental health issues being dealt with very badly (see quote

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<sup>17</sup> These quotes are not attributed to a pseudonym, so as to protect the confidentiality of the ESWA participant.

below). The severity and typicality of issues highlighted varied between participants and incidents but the overall picture was, in our assessment, grim.

“We’ve had [research] participants who have been having a clear mental health crisis, they’ve been arrested and detained...put in a jail cell and really violently thrown to the floor, handcuffed by three men, you know, after being like date raped? In what ways does that not compound the trauma of that individual?” – ESWA<sup>18</sup>

Police responses to sex workers were said to be especially poor in the context of certain crimes, particularly when they were victims of domestic violence and coercive control, non-payment and theft, stalking and harassment. Some felt the police in London generally do a better job with rape cases, but others disagreed, pointing to issues with front-desk officers being unsympathetic (see example below) or police not understanding or responding well to breaches of conditional consent to sex (especially where contingent on payment taken away or not received). While some of the issues here were described as also affecting non-sex working victims of crime, they were generally seen as compounded for sex workers. Typically, more problems were seen to arise when dealing with “generic”, “uniform” or “front desk” officers than specialist SOIT officers or sympathetic neighbourhood teams.

“Reporting crimes of sexual violence, rape, there directly over the counter...it's not a positive experience. And the approach of the officers is quite poor, the space is really poor in relation to privacy, but also their officers at the front desk are quite rude, kind of don't show a lot of empathy.” – Deborah, healthcare

Given the increasingly internet-mediated sex work landscape, many participants were particularly concerned about what they saw as limited policing responses to online stalking, doxing, blackmail and/or harassment:

“It doesn’t seem to be a police priority, even though it might have a huge impact on that individual or the victim’s mental health and wellbeing.” – Stevie, healthcare

“I’d like to see stalking and harassment taken more seriously, and for the police to have a more kind of rigorous response to it, as they may do with something like rape. It’s the same with fraud, it feels like an area that women fall through the gap on.” – Mary, faith-based NGO

We now turn to the category of the ‘lawful but awful’: issues raised that relate to policing practices that could be argued to be permissible under the current laws but often appeared to go against NPCC guidance. These activities are, we would argue, highly inadvisable because of the harmful outcomes participants detailed (harms which resonate with the broader evidence base, such as ECP, 2024; Elmes et al., 2021; ESWA, 2024; Platt et al., 2018, 2022). There were several main issues here.

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<sup>18</sup> These quotes are not attributed to a pseudonym, so as to protect the confidentiality of the ESWA participant.

Both fines and cash seizures were widely seen as harmful and counterproductive: pushing people into doing more and riskier sex work to pay off fines and make up losses, as illustrated in the quote below. For context, fines can be levied in the case of 'prostitute's cautions' (discussed shortly), breaches of Community Protection Notices or other civil orders, for example. Seizures, meanwhile, relate to money taken off sex workers (particularly in the context of brothel visits).

"You have a fine, somebody's got to work to pay off the fine... it's just ridiculous."  
– Susan, faith-based NGO.

Participants from SWOs saw such "revenue collection" (Charlie, sex worker organisation) as both widespread and effectively police-perpetrated economic violence against sex workers. Proceeds of Crime legislation was said to make seizures of individual earnings extraordinarily difficult to contest and actively incentivise raids, as illustrated below. Several participants also reported believing that officers routinely steal the money seized, which speaks to the depth of mistrust in policing.

"I absolutely am confident that one reason that they raid brothels is 'cos they know there's a lot of cash on site...they confiscate everyone's immoral earnings. I'm sure that they pocket it." – Isabelle, SWO

Overall, street workers were often characterised as a group especially vulnerable to being treated harmfully by police. Various participants criticised enforcement against street workers through civil orders in particular. As shown below, treatment of street sex workers was said to be particularly bad in certain areas of London (and beyond). Particularly in the context of gentrification, various participants described pressures on police from residents, local politicians and lobby groups "to be seen to be doing something" (Ruby, healthcare) about sex workers, especially street workers.

"I've heard some really awful stories from street workers down in [redacted: three London boroughs] ... just being degraded by the police...just not treated as human, not being taken seriously...being actively targeted and...police like just parking up in the areas where street work's happening, just to deter people, deter clients." – Isabelle, sex worker organisation

Participants who discussed the use of civil orders (e.g. Community Protection Notices, Public Space Protection Orders etc.) were typically in favour of minimising their use (or eliminating it entirely), so as to keep sex workers out of the criminal justice system. We were told that previously routine use of soliciting and loitering charges has largely (but not completely) been replaced by a reliance on a range of 'anti-social behaviour'-related civil orders, such as Public Space Protection Orders. Niki Adams (ECP) explained this situation in particular detail, arguing that this shift has not actually reduced fear and risk of criminalisation but simply pushed workers into more insecure and dangerous conditions, enabled their criminalisation by alternative means (and with a lower standard of proof) and made it harder to monitor and challenge punitive enforcement as it becomes "really, really hidden" (*i.e.* because it is less easy to disentangle from recorded crime statistics). Various others also said that such

enforcement against street workers increases fear and mistrust of police and disrupts relationships with support services. Some of these points are illustrated as follows:

“It’s become like a parallel legal system with a lowered standard of proof which really puts people at risk of, you know, police abuse.” – Niki Adams, ECP

“Workers on the open scene just feel like they’re being chased... there’s this constant cat and mouse. More arrests, more fines, more charges, a total disregard for their individual safety.” – Charlie, sex worker organisation

Concrete examples were given of various enforcement practices described in terms such as “very harsh” (Deborah, healthcare) and “heavy-handed” (Polly and Isabelle, sex worker organisations), including how civil orders were deployed across different London boroughs (and elsewhere in the UK). Some practices were characterised as particularly unjust, unworkable for those affected and ineffective (e.g. cautions being handed out to sex workers when just doing a grocery shop, or Community Protection Notices banning sex workers from an entire borough from 8pm to 8am).

While most enforcement-related activity fell into the arguably potentially permissible but ill-advised category, the example below speaks to overt breaches of due process (but we include it in this section as it is relevant to the other activity discussed here). Here, Niki describes issues with the so-called ‘prostitute’s cautions’, poor experiences of their usage in practice and limited avenues for challenge.

“And giving women prostitute’s cautions literally just by...driving by and they know the woman, they know that she’s working in the area and just shouting out of the car window saying, ‘Okay, we’re giving you a caution,’ which they’re not supposed to do...The prostitute caution...you don’t have to admit guilt and there’s no procedure to appeal, but even so they are supposed to formally give it to you and then they’re supposed to record it at the police station, but none of that was happening...we actually got one caution expunged on the grounds that there was no record of why they’d given it to her.” – Niki Adams, ECP

Despite their legal idiosyncrasies compared with standard cautions – as noted above there is no requirement to admit guilt, no right of appeal<sup>19</sup> – these cautions can result in fines (that can subsequently increase on later ‘convictions’) or mandated engagement with services (see also ECP, 2024 for more information on the lifelong impacts of these cautions). We did not have specific standard questions about

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<sup>19</sup>‘Prostitute’s cautions’ relate to the summary-only offence of ‘persistently to loiter or solicit in a street or public place for the purposes of offering services as a prostitute’ (Crown Prosecution Service, 2019). Crown Prosecution Service (2019) guidance states, ‘To demonstrate ‘persistence’, two officers need to witness the activity and administer the non-statutory ‘prostitute’s caution’. This caution differs from ordinary police cautions in that the behaviour leading to a caution may not itself be evidence of a criminal offence and there is no requirement for a person to admit guilt before being given a prostitute’s caution. Details of ‘prostitute’s cautions’ are recorded at the relevant local police station. Insertion of the word ‘persistently’ provides opportunities for the police to direct the individual to non-criminal justice interventions.’

mandated engagement for either sex workers or their clients, and this issue was only raised explicitly in four interviews and rarely in much detail. One participant worked for a faith-based NGO contracted to deliver such mandated engagement activities for both sex workers and their clients and, unsurprisingly, described them as very successful and called for their expansion across different geographical areas of London and intensification of action against clients where it was already happening (insufficient police staffing reportedly presented an obstacle to doing so at present). Another (also from a faith-based NGO) referred to client enforcement in passing, but also mentioned high non-reoffending rates (*N.B.* there are quite serious measurement issues with this claim). In contrast, two other participants were very critical. Challenging the idea that sex workers should be compelled into services, Niki Adams called the practice “outrageous” and asked “what kind of outreach is that?”. Speaking of client-focused mandated programmes, meanwhile, a healthcare participant focused on the indirect harms to sex workers as follows,

“I just don’t think that’s very good practice...those women are not just going to disappear off the face of the earth. They’ll go to areas which they may be more at risk, seeing clients that don’t care less about risk, or just move to another borough.”  
– Stevie, healthcare

Finally, how police work with Adult Services Websites (ASWs) and their data was not discussed particularly widely but was nevertheless a significant concern for multiple participants. Four participants from sex work organisations were very worried about policing activity in this domain, stressing the dangers of increased surveillance online and raising concerns around the backfire effects of interventions. Measures implemented ostensibly in the interests of anti-trafficking were said to make workers less safe and more vulnerable to violence, particularly migrant workers. Advertising online was said to be “so much safer” (Isabelle, sex worker organisation) because of the ability to make arrangements in advance and screen clients, but having to upload a passport was described as a considerable risk, with potentially long-lasting and wide-reaching ramifications. That was largely because of concerns that sex workers’ private data was being shared with police and border control, in the UK and internationally (especially in the United States, apparently increasingly affecting UK sex workers trying to travel there even for leisure). The use of scraping to harvest public-facing data from the sites, and personal data leaks were also concerns.

“Increased surveillance basically is just terrible for sex workers, and it puts them in just absolute increased risk of violence from clients and violence from the police.”  
– Charlie, sex worker organisation

“[ASW name redacted] in particular is an absolute fucking nightmare because they are so shady about everything that they do. They’re [the ASW] not transparent at all, and they’re really reluctant to admit like any agreement that they’ve had with the Home Office, and it means that, yeah, sex workers, especially migrant workers are really afraid of using [ASW name].” – Isabelle, sex worker organisation

Only three other participants discussed policing in relation to ASWs in any particular detail and their views diverged from those of the above-mentioned participants, and each other. One healthcare participant spoke of a recent shift in how ASWs worked with police and services, identifying both perceived benefits and risks in interventions designed to address trafficking and child sexual exploitation. Showing the complicated dynamics here, he also suggested that police collaboration might be necessary in the face of political pressures to close down sites altogether,

“I think years ago they [ASWs] were more left alone; they didn’t want to get involved with projects or the police. More recently...I’m aware of ASWs being more cooperative with the police and the police doing some good work with ASWs in terms of...making sure that people who advertise on ASWs are not underage, are not trafficked. Of course, it’s problematic. Age verification for sex workers is problematic, having to give your real details to an ASW is problematic. I think the approach of the police has been one of it’s better to work with ASWs than have them closed down, which obviously there’s a political pressure for that to happen. But my experience is of most police don’t see them as inherently harmful.” – Stevie, healthcare

Another healthcare participant suggested, with some caveats (e.g. not “being informants”), that more engagement between sites, services and the police was to be welcomed in the interests of safety and tackling exploitation.

“[Two major website names redacted] I think are...working more in cooperation with the sex worker services...and that they are listening to...the messages around safety. That they are cooperating and I wouldn't like to say they're being informants and telling the police everything, but I think they are working with the police to try and identify any exploitation or trafficking that might be going on... and that's a good thing.” – Deborah, healthcare

The final participant, from a faith-based NGO, was unhappy with the status quo because she felt there needed to be *more* intelligence-gathering online, criticising what she saw as a lack of prioritisation and funding at present (as illustrated below). Philippa said the NGO she worked for routinely scours ASWs and passes on reports of what they see as “clear and obvious” crimes to the police. She called for “the police or immigration [to be] more properly resourced to see the crimes and to tackle them”. Her suggestion that Immigration Enforcement should be involved is particularly striking, especially within the current context of hostile policies towards precarious migrants.

“But why aren’t the police actually scouring those websites and shutting those things down? And I know why – because they’re not resourced, they don’t have the time to do that, it takes a lot of time.” – Philippa, faith-based NGO

## **Doing policing differently – less but better engagement**

We asked everyone what good practice in policing in relation to sex work meant to them and what changes they would like to see. An overarching call (15 out of the 18 participants) was for doing policing differently, with most participants essentially wanting to minimise the criminalisation of sex workers, reorientate the focus to harm reduction<sup>20</sup>, and improve policing responses to sex workers who do want or need to engage with police. Targeting policing to where it is most needed and wanted would also carry benefits in terms of better use of resources, we would argue. In this section, we focus on suggested changes within policing, also acknowledging the importance put on broader systemic and legislative changes (covered in the next theme<sup>21</sup>) and recognising that this is a complex area without an “easy reform checklist” (Charlie, sex worker organisation). Calls for improvement fell into nine main categories, now outlined in turn.

First, and reflecting a perceived very low bar, many participants called for the police to treat sex workers as humans. That meant treating them respectfully, compassionately and without judgment, and upholding due process. Various participants said that also meant addressing problematic assumptions within policing (and beyond), such as the notion “that prostitution is uniquely degrading” (Niki Adams, ECP) and or “treating sex workers like they are unrapeable, which in turn makes them more vulnerable to violence” (Charlie, sex worker organisation). Relatedly, it was seen as crucial to end police mistreatment of intersecting marginalised communities at large. Some of these sentiments are illustrated by the following quotes –

“I think being really respectful, being more understanding, to understand what their needs are, to treat them like human beings, to not interrogate.” – Gary, healthcare

“I think good practice would be not like mocking sex worker’s concerns, not taking advantage of sex workers in custody, taking seriously violence and harassment of sex workers. I am laughing because it is just like so almost ridiculous. I think good practice with regard to sex workers is like good practice as a police force almost. You know, like not raping people in custody... until especially the Met sorts out so many of the other issues it is almost impossible to say like what good practice would look like for sex workers, because it would look like getting rid of all of those things to start with... less racism, less misogyny, less violence, less harassment.” – Polly, sex worker organisation

Second, participants from sex worker organisations typically wanted the police to leave sex workers alone to the greatest extent possible, as the quotes below show. Similar sentiments were shared by various participants in healthcare (and one in a

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<sup>20</sup> Harm reduction, it should be made clear, does not mean treating sex work as a ‘harm’, but rather ensuring greater safety and rights for those involved.

<sup>21</sup> While recognising it lay beyond the police’s remit, several participants also pointed to broader issues elsewhere in the criminal justice system – e.g. the Crown Prosecution Service discontinuing cases, long waits to trial, lack of counselling support for people who use drugs, secondary traumatisation through prosecutions etc.



faith-based NGO), who also stressed how counter-productive and damaging it was to bring sex workers into the criminal justice system where it could be avoided.

“What sex workers want, they want to be essentially left alone. They want the police to be an institution that they can go to if they have a problem, and feel safe and secure in the knowledge that they won’t be de facto criminalised by their very existence...They want to feel that they are not going to experience violence and harassment from police, because, because of the criminalisation of sex work, they are already contending with so much violence and harassment from clients.”  
– Charlie, sex worker organisation

“Just backing away... the police are so heavy handed... so many people are criminalised who aren’t actually, you know, having a negative impact on other people’s lives.” – Isabelle, sex worker organisation

Relatedly, several participants called for police to play to their strengths and focus on situations where they were well-placed to respond. As illustrated below, that meant leaving other more support-oriented roles to outside organisations.

“We need the police to focus on the justice, the investigative side of things, while the holistic cope and recovery elements of crime can be dealt with by partnering organisations, and third sectors who are separate from the police.” – Sarah, sex worker organisation

“So, in terms of what needs to change, they should stop welfare visits, just stop them completely, no excuse for them whatsoever, focus on the reports of violence and exploitation that sex workers bring to the police.” – Niki Adams, ECP

Third, participants called for more accountability in relation to police violence against sex workers, abuses of power and process, and poor handling of reports. At present it was said to be extremely difficult (and risky) to hold police to account. More effective processes and cultural change were both said to be needed, as highlighted below.

“I think one of the things that really has to change is the police have to deal with the violent officers, you know, they have to sack and prosecute officers who are violent, particularly against women.” – Lisa Longstaff, Women Against Rape

“This is an issue with police culture in general, but...like the thin blue line...and like covering up for each other.... Like why on earth would a sex worker ever complain about police treatment, knowing that even if it’s taken seriously and that copper’s disciplined, is held accountable, every other officer is going to know about that and they’re going to treat them like shit as well, and they will then target them.” – Isabelle, sex worker organisation

Fourth, there were widespread calls for an end to routinised policing practices seen as counter-productive, ineffective and as increasing sex workers’ vulnerability to violence – from the police, clients, and others. In practical terms, that meant many

participants advocated for stopping routinised enforcement against street workers (and their clients), police ‘welfare-checks’ and speculative raids under a veneer of anti-trafficking. An example is given below.

“Not just turning up at brothels. Not tricking people into allowing police into their home for welfare checks. Treating people as human.” – Isabelle, sex worker organisation

Relatedly, there were widespread calls for welfare-related functions to be devolved to non-policing organisations (including sex worker-led ones):

“I think that welfare visits and check-ins and those sorts of things should be done by partnering organisations, people in the community themselves, and not done by the police.” – Sarah, sex worker organisation

On balance, there would seem to be obvious benefits to removing police from the equation here and leaving this work to outreach providers. Given frequent accounts of how other services’ collaborations with police hurt independent outreach providers’ trust and ability to support sex workers, we would suggest that outreach efforts at large would likely benefit from a clear separation between police and services. The value of full transparency and informed consent in outreach was also stressed, as illustrated below. It is hard to see how that can be meaningfully achieved in joint ‘welfare checks’, given the power dynamics the police’s presence brings.

“The word empowerment is such like a cliché, but like that’s one way to empower people, like give them control, give them transparency, and let them consent.” – Isabelle, sex worker organisation

While various participants thought that police attending premises was *sometimes* necessary, many of them also called for a reduction in raids as well. The main call here was to focus only on situations of credible intelligence or reports of serious criminality. We recognise (as many participants did) that there some situations in which police are duty-bound to act due to serious safeguarding or public protection concerns, for example when children are thought to be in serious danger. The same would go for high-level organised criminality, although it was striking how little participants focused on organised crime in their interviews, suggesting assumptions of an extensive overlap between the sex industry and organised crime might well be overstated (although how broadly ‘organised crime’ is defined is probably also a key factor here).

If doing raids, the dominant view was that a more humane approach was needed than the perceived violence of the status quo. As illustrated below, that meant calling on the police to: not use excessive force; not intimidate, humiliate or isolate sex workers on site; not criminalise workers; not seize their earnings; not bring along Immigration Enforcement or share workers’ details with them; and to uphold due process (reading people their rights, having translators etc). One participant also suggested having independent legal advisors, so as to increase transparency and accountability and

discourage what they suspected to be widespread theft of workers' earnings. Some examples are given below.

"I mean, don't take immigration with you. Like that's not helpful." – Susan, faith-based NGO.

"Other than them not happening, police need to identify themselves. They need to read people their rights. They need to not isolate them. If they are looking for victims of trafficking, why are they treating sex workers like they are criminals?" – Charlie, sex worker organisation

Fifth, participants were upfront that extreme interpersonal exploitation in the form of trafficking/'modern slavery' *does* happen in the sex industry (as it indeed does in other industries). Without seeming to downplay either the occurrence or the harms of trafficking/'modern slavery', it was only ever seen by participants as a relatively small part of the sex industry. Yet many felt that the police (like others) were overly focused on these issues, at the expense of other harms – including various other crimes against sex workers and policing-related harms themselves. The perceived excessive focus on trafficking/'modern slavery' was criticised as having various negative impacts. A key one was simply detracting police attention from other crimes against sex workers (e.g. rapes, stalking, thefts etc.) that were seen as much more prevalent,

"If they want to be there to support sex workers and for the safety of sex workers, then they need to look at what is happening day in and day out. And that's violent offences, that's sexual violence, robbery, gunpoint, knifepoint, all these things are happening, day in and day out. That is where sex workers are at the most risk, they're unsafe." – Sarah, sex worker organisation

Another key concern related to how police work with ASWs in the name of anti-trafficking. Those who were extremely concerned about increased surveillance and data-sharing in this domain and the negative ramifications for sex workers, particularly migrant sex workers, strongly advocated for much less intervention online (see example below). It is also worth noting additional calls for much more transparency and accountability from police (and ASWs) about current practices, respect for privacy, and being much more alert to backfire effects that even well-intentioned interventions could have.

"Some of the tools that they're using to scope Adult Services Websites are completely inappropriate... I don't believe that that element of their work is needed." – Sarah, sex worker organisation

Clearly, how the police interact with ASWs and the data they hold is a very thorny issue, and even within our sample views diverged. We would argue that any interventions here should be very carefully designed, deployed and evaluated, centering the views and experiences of affected communities: which must include *both* victims/survivors of trafficking for sexual exploitation and consenting sex workers – as both groups can be heavily impacted by interventions in this space.

Other risks of focusing so heavily on trafficking/'modern slavery' were said to include creating false binaries of "worthy" victims and "antisocial" sex workers (Susan, faith-based NGO), whereby the former were seen to get preferential treatment at the expense of the latter. The dominant trafficking agenda was also seen to encourage the police (and others) to overlook structural drivers of risk and harm to sex workers (e.g. homelessness, poverty). It was also seen as encouraging and adding a veneer of legitimacy to heavy-handed and unwelcomed interventions in the name of 'rescue' and 'safeguarding' that could have major backfire effects for the target populations and make them *less* safe. To be clear, the call from participants was certainly not for police to ignore extreme exploitation but to ensure policing responses were more honest, transparent and appropriate than was currently seen to be the case and to not fixate on trafficking/'modern slavery' at the expense of a broader picture of harms. Occasional participants (with a policing abolitionist perspective) contested the utility of police doing anti-trafficking raids at all, preferring non-police intervention in such situations too.

Sixth, the most commonly-suggested way police might respond more effectively to trafficking for sexual exploitation was through improving relationships with sex workers (especially migrant sex workers) and sex worker-led organisations. While it is clearly easier for the police to engage with other constituencies, particularly those with similar goals and views, ultimately sex workers are the ones at the sharp end of the harms of current laws and policing practices. Some participants suggested that trust-building here would require concrete assurances of safety if engaging with the police and also more accountability from police for harms to date (see quotes below). We would also add that it is important that any such moves are not treated as extractive attempts to get intelligence from these organisations, but rather as an opportunity to listen to their concerns and seek to build better relations. Ultimately, that is likely much harder in this partially criminalised landscape than it would be under decriminalisation, because of the obvious conflicts of interests and ongoing harms associated with enforcement on sex work-related laws.

"I think the police may be missing a bit of a trick here. Trafficked people are by nature very, very hard to find. If you can just gain the trust of those people in society that are more likely to know where trafficked people are, then you're going to save yourself a lot of time. But to gain that trust those people must recognise that they're not going to suddenly be in the firing line themselves." – Stevie, healthcare

"Now, obviously some of those [SWOs] are going to be very cagey about that work, just because of the history in general, but I think that's part of the process...owning that actually the reason people have...these sorts of conceptions is not out of nothing...working within this community to build up that trust." – Adam, healthcare

Seventh, having single points of contact within policing was widely recommended (see quotes below). Virtually all participants saw that as vital in ensuring sex workers and intermediaries could connect with those with appropriate knowledge and expertise,

who were trusted and could escalate issues as necessary. Relatedly, several stressed the importance of enabling conversations with police in neutral places.

“Having a single point of contact for that service that’s working in the police that understands the needs of sex workers and that is able to escalate things, that has the right connections and knowledge within the force to direct it to the right team.”  
– Gary, healthcare

“If something is being reported to you, if you are aware of something, that you can say to a sex worker, look I know this police officer... they are lovely, they’re going to treat you with decency.” – Ruby, healthcare

“Safe spaces for people to talk that are not police stations themselves, especially for anyone who’s had contact with the criminal justice system themselves. Just going back into that space can be really retraumatising.” – Isabelle, sex worker organisation

Eighth, numerous participants stressed the importance of third-party intermediaries who can act as mediators, witnesses and advocates for sex workers. That was said to help ensure their rights, encourage due process, buffer against poor practices, and advocate for them. That could include both people in formal (e.g. Independent Sexual Violence Advisors, sex worker organisations) and informal roles (e.g. friends, peers). National Ugly Mugs (NUM) was frequently mentioned as a trusted intermediary and important mechanism for mediated reporting to the police (anonymously or not) and sharing safety alerts. ECP was also described as a trusted and long-standing intermediary. In the face of very real power imbalances, barriers to engagement with police and histories of poor treatment, it is hard to overstate the perceived importance of these roles, “The role of sex worker led organisations is really critical to sex workers’ interaction with the police.” – Charlie, SWO

Alongside sharing information with sex workers about these third-parties, police could help – it was suggested – by working effectively with these intermediaries, listening to their concerns and making sure they have the provisions in place to do their work most effectively (e.g. there were repeated frustrations from various participants that they were not given the single points of contact they needed and were instead channelled by the MPS into generic 999/101 reporting systems). Concerningly, the MPS was reportedly the only force in the country not to give NUM a single point of contact (neither for the force as a whole, nor for sub-commands). Not having that was said to be costing NUM scant resources and undermining sex workers’ willingness to report. The importance of third-parties was not limited to supporting sex workers in contact with police as victims and/or suspects, but also when they had witnessed crimes. Here, examples were given spanning murder, domestic violence, child sexual offences and firearms offences. Several participants described passing information to the police with consent – unless in exceptional circumstances<sup>22</sup> – or brokering contacts between sex workers and police. They often explicitly stressed that this was explicitly not about

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<sup>22</sup> Some participants said that they made these limits to confidentiality outlined in their organisational policies very clear to those they supported.

gathering intelligence<sup>23</sup> or betraying the trust of sex workers, but rather enabling information-sharing where sex workers wanted to pass on information but did not trust the police. Therefore, the police having good relationships and direct contacts with specialist support services was seen as vital here, as described below.

“Because they do have a lot of knowledge, they’ve got their ears to the ground and they know more about what’s going on around them than the officers, in my opinion... We don’t drag stuff out of anyone...they come to us because they’ve got concerns. They’re like anyone else... if they worry about somebody or something they will come and tell you.” – Gary, healthcare

Many participants stressed a need for wide-reaching changes to social policy on issues that intersect with sex work (e.g. homelessness, poverty). They also acknowledged that such transformational change is beyond the police’s capacity – although, we would suggest, senior leadership in policing could usefully add their voices to calls for legislative and systems change. More immediately, however, several stressed that the police can at least work more closely with external services to avoid drawing sex workers into the criminal justice system on, for example, ‘anti-social behaviour’ grounds. These points are illustrated below.

“To ensure that sex workers are not targeted, you know, with enforcement, with fines, with heavy criminal convictions, we want to keep people out of the criminal justice system... it’s about working with partnerships, working with sex worker services and peer groups to find ways and approaches of keeping sex workers safe.” – Deborah, healthcare

“We need to have better drug rehabilitation, we need better services for people who are using drugs or alcohol. We need to have better provisions for homelessness, better provisions for mental health, we need to really hammer home and look at the issues as to why we have so many women or people sex working in a specific area, and not just seeing it as antisocial behaviour.” – Sarah, sex worker organisation

Relatedly, many participants recommended the police work more closely with other services in general, partly because of their role as more trusted intermediaries and partly because of their capacity to offer alternative or additional provisions. Here, however, it is important to acknowledge some fundamental tensions that several participants raised – particularly people from sex worker organisations but also from healthcare. They suggested that those organisations most willing to work closely with the police may be furthest removed from sex workers’ interests and least likely to provide much-needed challenge. Conflicts of interest were also identified in collaborations with police, including in relation to vested interests (e.g. financial, ideological or political goals), particularly in relation to religious groups, so-called “exit services” and anti-trafficking/VAWG organisations (although a few participants also

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<sup>23</sup> Here, there was an obvious contrast to the participant from a faith-based NGO who stressed their role gathering intelligence, although there it was unclear what if any processes around consent and pre-warning of limits to confidentiality were in place.

criticised other services for also being too closely aligned with the police). These points are illustrated below.

“I think sometimes it might be to do with funding... I think probably existing organisations are more likely to see that, for example, police power and arresting clients and even arresting some sex workers may be a good thing.” – Stevie, healthcare

“There’s a kind of connection between the police, social services, funded services, that aren’t sex worker led or that don’t really meaningfully engage with the sex work community. They don’t listen to the sex work community, and they’re incredibly like paternalistic towards us rather than just listening and... taking things on board.”– Charlie, sex worker organisation

What that means in practice, we would argue, is that the MPS would benefit from very careful reflection about who they are working with, how, and why and being as transparent as possible. While it might be uncomfortable, there are obvious benefits in engaging with informed challenges about why some of these relationships might be inappropriate or counterproductive. As recognised elsewhere in this report (see Chapter 2), the police have numerous and often conflicting demands and goals in relation to policing in relation to sex work, and certain collaborations might feasibly enable short-term wins for policing but in doing so actually impede more fundamental priorities.

Ninth, numerous participants called for more training, as illustrated below. Particularly those who were involved in such training themselves saw it as helping inform more sensitive and appropriate responses, establish direct points of contact, encourage reporting etc. Less commonly, key limits to training were highlighted, including limits to what change it can achieve, possible self-selection biases if it is voluntary, and the all-important question of *who* provides the training. That has implications for how the issue is framed and what are presented as appropriate responses: indeed, within our sample, there was evidence of obviously conflicting values, goals and interests among those who train the MPS.

“I think they need to be committed to a level of training that is inclusive of understanding sex work, sex workers, the work they do and the violence that’s committed against them. Having a broad understanding and a commitment to a level of training, right from the beginning, from police officers who are students.”  
– Sarah, sex worker organisation

## **Calls for legal and policy changes to reduce policing-related harms**

While some officers we spoke to (see Chapter 2) criticised existing laws as problematic and contradictory, by and large they tended to take the laws as a given and focus on the existing system. In many ways that makes sense: the job of the police is to enforce laws as they currently exist, not only those they approve of personally. In contrast,

non-policing participants were not bound by any such obligation and drew attention to alternatives, critiquing not only the police's implementation of existing laws and policies but the laws and policies themselves.

There were three main calls here for changes to laws and policies that were seen as fundamentally important for enabling more effective, less harmful approaches to policing in relation to sex work. While these are not things the Operation Evergreen team can change themselves, they present obvious priorities for the wider criminal justice system and political leadership. While senior police leadership certainly have an important role to play in advocating for systems reform, clearly any real progress would require impetus from the Government itself and, in London, the Mayor's Office for Policing and Crime (MOPAC). Addressing these points is, we would argue, vital in the interests of enabling harm-reduction and delivering a better service to a multiply marginalised community at high risk of violence from clients and police alike.

The three most central issues<sup>24</sup> here were the perceived need for: 1) secure reporting pathways for victims and witnesses of crime who are migrants; 2) sex work decriminalisation; and 3) rethinking the current positioning of sex work under the VAWG agenda. While participants' positions were not unanimous, the points stressed here reflect common views and compelling arguments about why these things matter from a policing perspective, as well as in relation to broader rights-building, harm reduction and public health goals. The sentiment behind why many saw such more fundamental changes as so important is captured in the quote below.

“Things like this [study] can be so frustrating, because it's like, “Oh yeah, the police do want these small little easy actions,” and it's like, no, but the system itself is broken. Like they're not even plasters. You're just like giving it a wet wipe, but like that wound's still open.” – Isabelle, sex worker organisation

First, participants near unanimously identified migrant workers as being particularly scared of the police and reluctant to report, especially given potential repercussions in terms of Immigration Enforcement. Even with existing intermediaries in place, the best that could reportedly be offered at present were non-binding assurances from individual officers that victims' immigration status would not become a focus of investigations. As explained previously (and see also Chapter 2), we were told numerous examples of police actively involving Immigration Enforcement in their sex-work-related policing or passing on the personal data of individual sex workers (fewer concrete examples of the latter were given, perhaps because it is generally less visible, but it was no less a concern). Assurances from individual officers were often seen as important but not sufficient: for example, Sharon (healthcare) stated that even where they were in place locally, “no one wants to report it”. Relatedly, four participants explicitly identified a specific need for changes in the “policing of migration” (Adam,

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<sup>24</sup> These were not the only broader policy changes flagged as important. Other – but less commonly – discussed issues included drug policy reform to stop the criminalisation of people who use drugs, ‘no recourse to public funds’ and denying various groups the ‘right to work’ pushing precarious migrants into survival sex work, and trans-exclusionary policies that affect access to healthcare (important in the context of sexual assaults too).



healthcare), ways to formalise these assurances and enable securing reporting. That is arguably particularly important because – as Adam noted in the context of people seeking asylum – under current Hostile Environment policies, precarious migrants can be pushed into sex work because of being shut out of the regular labour market and recourse to public funds. These points are illustrated below.

“Good practice looks like having a firewall between immigration and police, just point blank.” – Charlie, sex worker organisation

“Because at the end of the day, a perpetrator's not going to stop, they're never going to stop, so maybe... some sort of leeway [i.e. in terms of not enforcing on immigration offences] should be given.” – Sharon, healthcare

Second, numerous participants argued that attempts to improve policing were inherently very limited by the current partially criminalised<sup>25</sup> landscape, as illustrated in the quote below.

“Good practice doesn't mean anything, what's needed is structural change ...and until those powers are taken away from them... you can find a few nice police officers and no change will really happen.” – Niki Adams, ECP

Certain laws were particularly widely criticised, especially the brothel keeping offence and how it criminalises two people working together for safety (the controlling law was also repeatedly mentioned as similarly all-encompassing and problematic). Overall, there were widespread calls for legislative reform. Most commonly, participants identified full decriminalisation<sup>26</sup> as vital. That was supported by ten of the eighteen participants: all six from sex worker organisations plus four from healthcare. They emphasised multiple benefits specifically from the perspective of policing in relation to sex work, including reducing unpredictability, curtailing various harmful but lawful enforcement practices, improving trust, reducing stigma, making sex workers less of an easy target for violence, increasing safety, enabling reporting, and improving responses to sex workers as victims of crime. Some of these arguments are illustrated below. It was also seen as crucial from the perspective of building rights and respecting workers' voices and priorities.

“Removing that criminalised aspect of sex work can allow for sex workers to feel that they can have a safe and trusting relationship with the police.” – Charlie, sex worker organisation

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<sup>25</sup> We refer to partial criminalisation because although selling and buying sex are legal in England and Wales, a whole host of attendant activities are criminalised (e.g. soliciting, loitering, brothel keeping and 'controlling' offences).

<sup>26</sup> A main caveat noted here was the importance of also including migrant workers within decriminalisation (unlike in, say, New Zealand). Beyond the ten participants who called for full decriminalisation, five did not express any particular calls in terms of legislative reform and four said they wanted reform but were not especially keen on full decriminalisation. Of those four, two were in favour of reforming the brothel keeping law to allow two people to work together for safety but were less clear beyond that, one said they would prefer the 'Swiss model' (legislation) and one called for asymmetric criminalisation.

“If something is criminalised or partially criminalised, it increases stigma...if you increase stigma, you reduce safety. I want sex workers to remain safe and be able to report crime and they’re more likely to do that under the decriminalised model. Also, the other reason I want it is because nearly all sex workers I’ve spoken to about the issue have said they wanted it to be decriminalised.” – Stevie, healthcare

Eight participants raised major concerns about the ongoing political push towards introducing asymmetric criminalisation elsewhere in the UK (i.e. illegal to buy sex, but legal to sell). This model (aka the Nordic Model or sex buyers law) is already in place in Northern Ireland. Just one participant (from a faith-based NGO) actively called for this legal model. In contrast, participants from sex worker organisations, healthcare and one from another faith-based NGO all stressed the harms of asymmetric criminalisation, for example as follows:

“It just makes it more dangerous; it makes it more dangerous; all the decent customers disappear, it makes it worse and all the evidence, I can’t think of anything good about it at all.” – Ruby, healthcare

“In every country where client criminalisation has been enforced, violence against sex workers goes up...I just think it is nonsensical...it ignores the like decades of sex worker rights organising who are saying that it is unhelpful.” – Polly, sex worker organisation

Third, there were also calls to rethink the positioning of policing sex work as violence against women and girls (VAWG). For context, in London that was formalised in the Mayor’s VAWG Strategy for London 2022-25, which emphasizes the need for a ‘consistent policing response to women involved in prostitution... for the whole of London’ (MOPAC, 2022). Participants noted that positioning sex work under the VAWG umbrella has the knock-on implications for policing and local authority responses to sex workers. A few described benefits, including in terms of access to VAWG funding and recognition of risks of violence to sex workers, and several had no particular views on this topic. The clear majority (two thirds of participants), however, did not think sex work should be positioned as a form of VAWG, with particular pushback from healthcare and sex worker organisations. What they were disputing here was not that sex work is *associated* with high risks of violence (from clients, police or others), which they often noted themselves and is also well-documented in the broader evidence-base (Platt et al., 2018). Instead, there were two main objections to the VAWG framing, with one or both raised consistently. The first was that many participants took issue with the underlying assumption that sex work is *inherently* a form of violence<sup>27</sup>, emphasising that that conflicted with their own experiences and detracted from sex workers’ agency, choices and constraints. The second was that the focus on *women and girls* sidelines sex workers who are not women (or not cis-

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<sup>27</sup> Only one participant argued that sex work was itself a form of violence against women, which was the same person who advocated for the Nordic Model.

women), their experiences of violence, and their needs. These arguments are detailed below.

“I think it plays into a feminist narrative of all prostitution as violence against women, which is deeply unhelpful because it removes agency from people doing sex work consensually. It flattens the experiences of those who may be doing sex work non-consensually, but it still might be the best option for kind of what they need to do. It plays into this sort of rescue narrative which has like time and time again been proved to be both unhelpful and like harmful. It ignores the experiences of people who are not women selling sex.” – Polly, sex worker organisation

“The fact is that sex work is not all violence against women. It’s not just women that are involved. It’s trans people, it’s non-binary people and it’s men. They’re not a tiny-teeny minority either... I’ve met many, many cis gendered female sex workers who say that they don’t think their job is inherently violent. What am I going to say? Oh no, you’re wrong, I know you better than you know yourself because I’m a practitioner, that would just be ridiculous.” – Stevie, healthcare

Importantly, these views were not, as is sometimes argued, those of a privileged few. Instead they were shared by people who themselves belonged to marginalised communities and/or worked with people who would commonly be conceptualised as particularly ‘vulnerable’ (e.g. trafficking victims/survivors, street workers). Various people argued that much of the problem with the VAWG sector is that sex workers and their organisations are just not listened to, and their views, experiences and expertise routinely ignored or disregarded,

“There’s this real like, ‘If you do not subscribe to the idea that sex work is inherently violent then you are a gender traitor, or you can’t speak for the majority of sex workers’.” – Charlie, sex worker organisation

“They’re hostile to sex workers, they only relate to them in terms of women who need to be rehabilitated rather than being respectful of women’s own decisions... There’s an attitude that, you know, prostitution is the worst thing you can do... Not being able to feed your kids is actually a worse violence against you than anything that you do in sex work...they never consider that.” – Niki Adams, ECP

## **Recommendations from stakeholder interviews**

Based on the interviews with stakeholders, including their concerns, tensions, suggestions and our overall analysis, we make some specific recommendations in this section. In Chapter 4, we follow these with some overall recommendations building on both strands of the research (interviews with officers and external stakeholders).

The recommendations from this strand of the research can be grouped as follows. First, recommendations for co-producing solutions with communities bearing the brunt of current policing-related harms in this domain (involving broader communities is also worthwhile, see Chapter 4). Second, recommendations for tangible changes

that the police could make within current systems. Third, recommendations for broader-reaching systems changes that are important but would require political backing.

#### **Recommendations for co-production of pathways to change**

- Establishing dialogue between MPS leadership, MOPAC, sex worker-led organisations and trafficking survivors around the results of this project and the broader evidence-base (including the NPCC guidance), to develop a tangible action plan specific to making improvements to issues considered most pressing in London.
- Committing to meaningful engagement with people with lived experience of policing and its harms and their collectives and organisations, making sure their contributions are fairly compensated<sup>28</sup>.
- Discussing pathways to implementation of key recommendations for change proposed by external stakeholders (see next set of bullets), identifying any particular tensions and barriers and possible ways of mitigating them.
- Securing funding to develop pathways to implementation, including funding for impact and evaluations of any major changes made. Investing in evaluation could build a stronger evidence-base on implementation and outcomes of progressive policies that could, in turn, inform and support improvements elsewhere in the country.

#### **Recommendations for changes within existing systems**

- Treating sex workers respectfully, compassionately and without judgment, and upholding due process in police interactions with them.
- Providing a good level of service to sex workers who are victims of any crime and not focusing so much on perceived trafficking and exploitation risks that other day-to-day forms of violence get overlooked.
- Building and maintaining relationships with trusted third-party intermediaries, including ISVAs, National Ugly Mugs and sex worker-led organisations. Doing so could help build trust and access to criminal justice for sex workers.
- Recognising that not all partners are equal in supporting sex workers, and care must be taken to ensure that suitable partners are chosen.
- Implementing single points of contact within policing for sex work, to support sex workers and their intermediaries (including an MPS single point of contact for National Ugly Mugs).
- Focusing on high-harm situations where police are well-placed to respond and leaving other more support-oriented roles to outside organisations.
- Ending routinised policing practices that reduce trust and increase sex workers' vulnerability to violence (examples highlighted include routinised enforcement against street sex workers and their clients, police 'welfare checks', and speculative anti-trafficking raids).

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<sup>28</sup> On the importance of meaningful engagement and adequate compensation for experts by experience, see, for example, Ash & Otiende (2023).

- Focusing raids only on situations where there is credible intelligence or reports of serious criminality, serious safeguarding or public protection concerns (e.g. child sexual exploitation) and ensuring those are delivered humanely.
- Increasing accountability and enabling redress for police violence against sex workers, abuses of power and process, and poor handling of reports.
- Increasing transparency and accountability around police collaborations with adult services websites (ASWs), ensuring that any joint activity accounts for and is responsive to the needs and experiences of affected communities.
- Improving training around sex work, also thinking carefully about what organisations are best placed to provide it.

### **Broader legal and systemic reform**

- Addressing violence against sex workers, but rethinking how VAWG policies implicitly frame sex work itself as a form of violence.
- Establishing secure reporting pathways for victims and witnesses of crime who are migrants.
- Implementing full decriminalisation of sex work, as per the strong international evidence base<sup>29</sup>.
- Supporting broader changes to social policy and funding for issues that intersect with sex work, such as homelessness, poverty, drugs and migration policy.

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<sup>29</sup> Full decriminalisation is a human rights-oriented and evidence-based position. There is growing consensus on the importance of decriminalisation internationally, from a public health, safety, harm reduction, and social justice perspective. It is supported by the United Nations Working Group on Discrimination against Women and Girls, the World Health Organization, the UN Development Program, the UN Program on HIV/AIDS, the UN Population Fund, leading international NGOs (e.g., Amnesty International, Human Rights Watch, Liberty, the International Planned Parenthood Federation and the Global Alliance Against Trafficking in Women), sex worker organisations internationally, and many others. In jurisdictions where decriminalisation has been implemented, positive gains from a crime prevention and criminal justice perspective have been documented, including stronger deterrents to violence, increased likelihood of sex workers reporting to the police, improved relationships between sex workers and police, reduced police corruption, and financial savings to the criminal justice system (for further discussion, see, e.g., Abel, 2014, 2018; Linstrum-Newman & Gloss, 2024; Platt et al., 2018).

# Chapter 4: Discussion and Recommendations

## Introduction

Overall, the key themes identified through the interviews with both police officers and key non-policing stakeholders very much resonated with the existing literature on policing in relation to sex work and trafficking for sexual exploitation (e.g., Bowen et al., 2021; ECP, 2024; Elmes et al. 2021; ESWA, 2024; Hanks, 2022; Holt & Gott, 2022; Kenway, 2021; Kjellgren, 2022; Platt et al., 2018, 2022; Sanders & Laing, 2018; Smith & Mac, 2018). What distinguishes this project from most prior research is the ability to compare and contrast both sets of viewpoints within a single project and in relation a single geographical context. In doing so, we found both key points of convergence and divergence on how policing in this domain was perceived. Interestingly, in certain areas where police and non-police participants raised concerns about current approaches/practices, their understanding of why the status quo was not working and/or how it should be changed tended to differ significantly.

## Discussion

In this final chapter, we highlight some key points of agreement and of tension across the two sets of interviews, finishing with some brief overarching recommendations as next steps. We identified five major such areas that we now discuss in turn.

### Nature of sex work

Both policing and non-policing participants tended to recognise the diversity and variation within sex work in London, emphasising differences both by area, demographics and type of sex work. Non-policing participants tended to be more inclusive of cis-male and trans sex workers in their discussions, whereas police participants recognised their existence but had typically had little to no direct interactions with them, they said.

The intersectional forms of marginalisation affecting sex workers were highlighted much more extensively by non-policing participants. In contrast, policing participants tended to see different groups of sex workers in much more binary terms (e.g. they spoke extensively of British sex workers with problematic drug use versus migrant sex workers often seen as being controlled by third parties, particularly intimate partners). Among the police participants, there was an obvious tension between the same people both referring to sex work as a “lifestyle choice” and implying it was something virtually nobody would choose to do but as a last resort. In contrast, non-policing stakeholders typically seemed to have a more inclusive understanding of spectrums of both agency and constraint, often focusing instead on structural and situational factors contributing to people doing sex work.

## Perceptions of general policing in relation to sex work

Both sets of participants emphasised the inconsistency and unpredictability of police responses to sex work and sex workers in London. Both groups tended to focus primarily on sex workers as victims of crime, or as perpetrators of sex-work-related offences (widely seen by non-policing participants as unjust laws). The nature and range of crimes against sex workers was much broader in focus in the non-policing interviews (e.g. robbery, stalking, physical assault, rape, harassment etc) than in the policing interviews (where the focus was on serious sexual offences). That implies that police have a narrower view of response needs and priorities for this group. A major point of disagreement was that police participants near unanimously suggested that police offered the same level of service to sex workers as they would to any other victims of serious sexual assault. Among non-policing participants, views were much more mixed (and often very negative) and many emphasised problems sex workers face both in reporting at all and being treated decently by police.

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### Enforcement

Non-policing stakeholders in particular, but also most police participants, generally saw it as unhelpful and counterproductive to issue fines and criminal charges to people for street sex-work-related offences. Beyond that, there was relatively little agreement in terms of how best to deal with “community” tensions associated (in some cases) with street sex work. Police tended to focus more heavily on ‘nuisance’ and ‘anti-social behaviour’ complaints, often recognising a tension between the need to build trust with sex workers and how being seen to do nothing could impact on their trust and legitimacy among wider local communities. In contrast, non-police participants were generally more invested in improving non-policing responses (e.g. housing, welfare, outreach services etc) to meet the needs of street-based workers, and reduce the risks of their criminalisation. This divergence is further reflected in different understandings of harm reduction. For most, though not all, non-policing stakeholders their primary interest was making sex workers safer, whereas police often, though not always, implicitly saw sex work as a harm in and of itself – both to workers themselves, and communities. Police participants tended to think increasing regular contact with sex workers on the street, asking after their wellbeing etc, was a trust-building exercise, whereas non-police participants tended to see street workers as among the most exposed to the whims of policing.

Client-focused enforcement was another area of tension, with a range of views within and between groups. Those in favour (mostly police) saw it as a good alternative to criminalising sex workers, whereas those against it (mostly non-police) saw it as ultimately harming sex workers too.

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## **Police violence**

Non-policing participants often stressed the violence police can perpetrate towards sex workers, including but not limited to physical, sexual and economic violence (examples of the latter given in the interviews included theft of earnings and abuse of power to get free services). Some saw the police as an inherently violent institution and reputational issues for the MPS in particular were also raised. Police interviews, on the other hand, were remarkably silent on the topics of both police as clients of sex workers and police as perpetrators of violence and various crimes towards sex workers.

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## **Doing less**

Non-policing participants often called for the police essentially to do less but do it better, focusing on improving responses to sex workers as victims of crimes and stopping or at least scaling back on various other policing practices widely seen as harmful (e.g. 'welfare checks'). While many police also felt they should scale back on some of their activities, they nevertheless stressed their obligations in relation to safeguarding, community complaints and tackling organised crime. On the latter note, it was striking how little 'organised crime' was discussed by non-policing participants. Relatedly, there was a tension between most non-policing participants seeing trafficking as being very much in the minority versus police tending to think that extreme exploitation and control were often behind sex work, even if not immediately visible.

## **Brothel visits – why they are done and how they are perceived.**

Brothel visits were one of the most contested areas of focus. While police participants tended to frame these as part of neighbourhood teams' attempts to map the local 'problem profile' and enquire after the welfare of workers there, non-policing participants (with a few notable exceptions) tended to see them as intrusive, traumatising and harm-producing. Many non-policing participants robustly challenged the notion that such visits were oriented towards or could feasibly produce improvements in sex workers' welfare. Interestingly, many policing participants were also sceptical about the welfare-related gains, seeing these visits as more useful for other goals (e.g. intelligence gathering), a tick box exercise, and/or something they felt the police had to do because who else would. Another particular point of contention, even within the non-policing stakeholder group, was around third-party agencies who accompany police on such checks: those themselves involved in doing so felt their role was beneficial and necessary, whereas many others were deeply sceptical about vested interests and agendas. Concepts like safeguarding, vulnerability and anti-trafficking all proved extremely divisive, and have been heavily contested elsewhere in the literature too (see, e.g., Hanks, 2022; Smith & Mac, 2018).



## **Migrant sex workers and the law enforcement/ immigration overlap**

Police involvement of Immigration Enforcement was another majorly divisive issue, although there was relatively little knowledge or consensus about how much this actually happens in practice. Police officers were often unaware of NPCC guidance around this issue and their views diverged on whether or not it was good practice to involve Immigration Enforcement and under what circumstances. In contrast, the vast majority of non-policing stakeholders saw the overlap (or risk thereof) between policing and Immigration Enforcement as a major source of fear, mistrust and unpredictability for migrant sex workers. That was described as a fundamental barrier to reporting victimisation and grounds to avoid interactions with the police. There are longstanding calls for secure reporting pathways to which our report adds, including in relation to domestic violence, human trafficking and forced labour (see, e.g., FLEX & LAWRS, 2022).

## **Role of VAWG**

Police participants tended to consider bringing the response to sex work under the VAWG agenda as a good thing for two reasons. First, because it highlighted the issue of violence against sex workers. Second, because it meant police could get more resources (in theory) – although in practice they had yet to see the benefits. When asked whether the VAWG framing would adversely affect the policing response to cis-male or trans sex workers, police participants were adamant it would not. Non-policing participants, where they had a view on this issue at all, were largely critical of the VAWG framing. That was firstly because it was felt wrongly to frame sex work as a form of violence in itself, and secondly because sex workers are not all cis-women.

## **Legal reform**

Many participants in both groups stressed a need for legal reform in relation to policing in this space. Police participants tended to be in favour of either legalisation (not to be confused with decriminalisation) or of being given more powers to operate in this space (which in effect would mean more criminalisation). The most commonly voiced and well-evidenced calls among non-policing participants were for full decriminalisation.

## Overall report recommendations

On top of the strand-specific recommendations (see Chapter 2 and 3), we would recommend the following.

1. We would advise the MPS to clarify what are the outcomes that senior leadership are seeking to achieve and are prepared to prioritise in this space, bearing in mind that certain aims can only be pursued to the detriment of others (e.g. building trust vs 'welfare checks').
2. To enable strategic and operational improvements, we recommend a better organisational structure be put in place to support responses to sex workers (i.e. establishing responsibility, Met-wide strategy, 'ownership', coordination, resourcing of single points of contact, transparency, accountability, appropriate training and education for officers and addressing police misconduct).
3. Above all, we recommend that the MPS put sex workers and their organisations (particularly sex worker-led and by-and-for groups) at the heart of any reform, resourcing the process properly (compensating them for their time and expertise) and committing to taking their recommendations seriously.

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