

Crime and Policing Bill Call for Evidence

Submission from Changing Lives

1. Introduction

- 1.1. Changing Lives is a national charity with around 100 projects across England, supporting people facing challenges such as homelessness, addiction, contact with the criminal justice system, sexual exploitation, long-term unemployment and more.
- 1.2. Our submission pertains to tabled amendments focused on sexual exploitation. Changing Lives has delivered support to people with experience of sex work, survival sex and sexual exploitation since 2006. Our current provision includes the Home Office-funded Netreach programme, which provides outreach and one-to-one support to those advertising sexual services online as well as those who have experienced online harms and tech abuse.

2. Adult Service Websites

- 2.1. Changing Lives' Netreach model of support was first introduced in the North East in 2019 in response to a growing trend of people advertising sexual services online. Netreach staff are trained to distinguish consensual sex work from indicators of potential exploitation that others may miss. This is supported by tools such as the Sexual Trafficking Identification Matrix (STIM) and an AI tool called Traffic Jam which analyses phone numbers and images to build up an intelligence picture. We also monitor punter sites, where sex buyers leave reviews, which provides numerous opportunities to safeguard victims and gather intelligence.
- 2.2. We work closely with police to share the intelligence we have gathered, often forming part of large-scale investigations, and to collaborate on appropriate trauma-informed responses. Unfortunately, police resources are limited, especially now the National Crime Agency is no longer supporting modern slavery investigations, so our ability to support with intelligence gathering in this way is vital.
- 2.3. Our monitoring of online spaces has revealed a growing number of adverts on adult service websites (ASWs) as well as community selling pages. For example, in Merseyside in 2023 a snapshot of ASWs found 186 adverts. In March 2025 we found 1,559 adverts across just the two dominant ASWs (Vivastreet and AdultWork).
- 2.4. This is driven by a number of factors and likely reflects both a growth in independent sex workers moving online and perpetrators of sexual exploitation using the platforms. It is important that any legislative response considers all users of these platforms.
- 2.5. ASWs are often used by independent sex workers as a safer method of advertising their services or to provide sexual services fully online. This is widely considered to be comparatively safer than other forms of sex work such as street sex work.
- 2.6. Shortly after Netreach first began we saw a number of adverts specifically citing the COVID-19 lockdown as the reason why people were engaging in sex work for the first time, or advertising online for the first time when they may have previously been seeking clients through other means. Since then the ongoing cost of living pressures have been cited both in online posts and directly to our staff as a contributory factor to people entering, returning to or continuing to engage in sex work.

- 2.7. As well as situational factors like these, we have also observed a rise in online adverts which indicate potential exploitation and trafficking. This is believed to be driven in part by organised crime groups (OCGs) developing a growing presence on ASWs, with a particular focus on women who have been trafficked from overseas.

3. Amendments targeting sexual exploitation

- 3.1. We are concerned about tabled amendments to the Crime and Policing Bill that target sexual exploitation. Our feedback specifically focuses on *NC1: Commercial sexual exploitation by a third party*.
- 3.2. The wording of the amendment is very broad and could criminalise activities aimed at the safety and wellbeing of sex workers. For example, giving out condoms or harm reduction advice to sex workers could be counted as ‘assisting’ and hence fall foul of the proposed legislation. A romantic partner of a sex worker with whom they share finances and/or accommodation could be seen as ‘profiting’ from their partner’s sex work.
- 3.3. One of the goals of this amendment is to make it a criminal offence to operate a website hosting adverts for ‘prostitution’. As well as being immensely harmful to independent sex workers, we do not believe that this measure would achieve the intended aim of tackling sexual exploitation and could in fact make it worse.
- 3.4. Firstly, the amendment inappropriately conflates sex work / prostitution with sexual exploitation. The conflation of the two contributes to stigmatisation of sex workers and also has negative practical implications for both sex workers and those experiencing sexual exploitation. For example, being seen as a victim or someone who needs rescuing can deter sex workers from seeking support. Furthermore, an independent sex worker who has been assaulted by a client is very different from a person who has been trafficked and forced to sell sex by an abuser. While both require a response, it is important that statutory and non-statutory services understand the distinction and nuances of each person’s situation and adapt their response accordingly. Calling both cases ‘sexual exploitation’ can mean those nuances are lost and if all sex workers are seen as victims of sexual exploitation it risks diluting the response from law enforcement, adult social care and others.
- 3.5. Secondly, criminalising ASWs would remove a vital source of income for sex workers. The experiences of sex workers and their reasons for engaging in sex work are diverse, but many cite the lack of suitable alternatives to meet their living costs. Especially if measures are not taken to address factors such as inadequate support from welfare and lack of suitable housing, people will remain in sex work but find their options for doing so safely significantly reduced. Removing the ability to vet clients or to organise bookings themselves increases sex workers’ reliance on others (e.g. managers/pimps) or forces them to engage in street sex work wherein they are exposed to higher rates of physical and sexual violence. Furthermore, if the amendment achieves a reduction in demand for sex workers, this also increases the likelihood of sex workers having to adapt their practices to ensure they are earning enough (e.g. lowering their prices, offering more risky activity such as sex without a condom, accepting business from clients they do not feel comfortable or safe with). All of this increases the risk of

people being subject to exploitation, as well as contributing to poverty and associated poor health outcomes.

- 3.6. Finally, removing the websites also reduces the ability of both law enforcement and services such as Netreach to identify and safeguard victims of exploitation. Adverts provide vital intelligence which can be used to safeguard victims and disrupt the activity of traffickers. We have long been aware that OCG's tactics involve moving women around to avoid detection (e.g. running pop-up brothels), but online adverts give a window into where women are located. Even removing the adverts can alert OCGs that their activities have been detected, potentially interfering with police investigations and leading traffickers to relocate women who might otherwise have been protected. The exploitation is not stopped but merely displaced, including to the dark web where perpetrators act with the greatest impunity.
- 3.7. These outcomes are not merely speculative but supported by evidence from other countries. For example, police in San Francisco recorded a 170 percent jump in reports of human trafficking¹ in 2018 following the introduction of the FOSTA-SESTA laws, which shut down ASWs. Sex workers reported former pimps getting in contact offering to 'manage' their business² and having to resort to different measures to make enough to cover their bills (e.g. sex without a condom)³. The FBI reported that their ability to identify and locate sex trafficking victims and perpetrators was significantly decreased following the takedown of the dominant ASW Backpage.com⁴ (not a direct result of FOSTA-SESTA but happening within days of each other). There are also doubts over whether the ban actually resulted in a reduction in exploitative ads being placed online. Initial reports said that ads decreased by 90% immediately after FOSTA-SESTA was implemented (including both ads made by independent sex workers and trafficking ads), but an analysis by the Washington post found that within four months that number had rebounded to 75% of the original figure⁵.
- 3.8. There are alternatives that should be considered instead of the proposed amendment, which we urge the Committee to reject. While these are outside of the scope of the Bill itself, we hope that consideration of these measures will reassure Committee members that there are alternative means to tackling sexual exploitation should this amendment be rejected. Changing Lives recommends the following measures to tackle online sexual exploitation:
- 3.8.1. **Wider rollout of the Netreach approach:** As far as we are aware, most outreach to those involved in the sex industry remains focused on street sex work. While this work is vital as street sex workers are often at most risk of harm, support needs to keep pace with the nature of exploitation which means an increased online presence for those trained to recognise and respond to exploitation.

¹ [New Laws Forced Sex Workers Back On SF Streets, Caused 170% Spike In Human Trafficking - CBS San Francisco](#)

² [Sex Sells, But Not Online: Tracing the Consequences of FOSTA-SESTA - BJCL](#)

³ [How the Backpage shutdown impacted the commercial sex industry and trafficking | Nebraska Public Media](#)

⁴ [Sex Trafficking: Online Platforms and Federal Prosecutions – Government Accountability Office](#)

⁵ [Has the sex-trafficking law eliminated 90 percent of sex-trafficking ads? - The Washington Post](#)

- 3.8.2. **Increased collaboration between police and support services.** We have seen positive results from collaboration and co-location with police forces, allowing us to support police to disrupt and pursue perpetrators of exploitation, as well as creating robust victim engagement strategies. This has been particularly beneficial when engaging with victims of exploitation who are reluctant to engage with the police or criminal justice processes. We recommend that this approach is implemented across police forces.
- 3.8.3. **Increased responsibility on the part of the providers of ASWs.** While we advocate for these sites being allowed to operate, we would like to see more providers proactively take action to safeguard users and tackle exploitation on their platforms. Vivastreet, for example, work alongside organisations such as Changing Lives by referring adverts which contain potential indicators of exploitation for triage and ongoing support where required. Over-regulation can also be damaging, particularly for those involved in survival sex, but there is far more that these sites could do to work with police and organisations such as Changing Lives to make their platforms safer.
- 3.8.4. **Measures to target vulnerabilities.** Removing the means by which many sex workers make money will expose them to financial insecurity and will do nothing to address the issues which drove some to the point where they saw no option other than to provide sexual services online. Instead, we would like the government to address the numerous systemic issues which led them to this point – including housing, welfare, addiction and recovery, and mental health. This would be a genuine cross-departmental approach to halving VAWG in a decade.