

Submission from Nordic Model Now! to the Committee Against Torture in Advance of its Examination of the United Kingdom at the 66th Session

March 2019

About us

Nordic Model Now! is a UK grassroots women's group campaigning for the abolition of prostitution and for the Nordic Model (also known as the Sex Buyer Law). All members are unpaid volunteers and the group includes survivors of prostitution. See <http://nordicmodelnow.org/> for more information.

Summary

This submission relates primarily to Items 11 and 12 (violence against women and human trafficking) on the Committee's List of Issues prior to the submission of the UK Government's sixth periodic report.

For simplicity, in this submission we use the term **sex trafficking** to mean human trafficking for the purpose of the exploitation of the prostitution of others or other forms of sexual exploitation.

Our key concerns can be summarised as follows:

1. The human trafficking legislation for England and Wales is the Modern Slavery Act 2015 (MSA). This does not use the internationally agreed definition of human trafficking and instead centres the definition on **travel**. If travel cannot be proved, according to the MSA, human trafficking did not take place. The forms of human trafficking to which males are more likely to fall victim are framed as 'modern slavery' without the need for travel to be proved. The MSA is therefore profoundly sexist, and we show that it implicitly normalises and trivialises prostitution, and positions it as a form of work. It fails to send out a clear, easy-to-understand message to society, and by obfuscating the true nature of sex trafficking, it obscures the measures that are required to prevent it and means most sex traffickers have virtual impunity.
2. The National Referral Mechanism (NRM) is the identification and support system for victims of human trafficking in the UK. Its guidance uses a different definition of human trafficking from the MSA but also requires the movement of the victim. This is of profound concern and inevitably means that the true extent of sex trafficking in England and Wales is vastly underestimated and most victims go unrecognised and unsupported.
3. The UK Government is abrogating its duty to take effective and robust measures to prevent sex trafficking.

4. Prostitution itself is a form of violence against women and girls (VAWG), and it fits the definition of cruel, inhuman or degrading treatment in Article 16 of the Convention, if not the definition of torture in Article 1. And yet the Government is complicit in women being forced into prostitution under the coercion of extreme poverty caused by the Government's austerity measures.
5. The legislation against profiting from other people's prostitution is weak and poorly implemented, meaning that the Government is abrogating its responsibilities to effectively suppress the exploitation of women's prostitution.
6. There are a number of anomalies in the legislation against the sex trafficking and sexual exploitation of children, including that when the child is 13-18 years old, the burden of proof is on the prosecution to prove that the accused knew the child was under 18. This is a get out of jail free card for perpetrators.
7. Services for women in prostitution are mostly focused on 'harm reduction' rather than providing women with genuine routes out and as such often serve to trap women in prostitution and to maintain a thriving sex trade.

1. The Modern Slavery Act 2015 (MSA)

The Committee asked the UK Government to provide information on the [MSA](#),¹ which is **the** human trafficking legislation for England and Wales.

The MSA does not use the internationally agreed definition of human trafficking set out in Article 3 of the [Palermo Protocol](#).²

We raised this with the CEDAW Committee prior to their 72nd Session and in its [response](#)³ to their questioning, the UK Government claimed that the MSA is "fully compliant with the Palermo Protocol" and that there are "no gaps or shortcomings" that prevent the "disruption and prosecution of trafficking activities." However, this is simply not true. The [review](#)⁴ of the MSA carried out by Caroline Haughey in 2016 found there were serious concerns about the definition of the offence of human trafficking (see page 28). Unfortunately the review did not consider these concerns in relation to the Palermo Protocol definition.

The MSA defines the offences in Part 1, sections 1 – 4.

Section 1 defines offences of "Slavery, servitude and forced or compulsory labour." These broadly correspond to the forms of exploitation defined in Article 3 of the Palermo Protocol with the exception of organ removal and the exploitation of the prostitution of the person or other forms of sexual exploitation. Subsection 4 (b) provides a possibility of prosecuting the latter under Section 1. However, doing so implicitly frames the prostitution or sexual exploitation as a form of labour, which contravenes the understanding implicit in the Palermo

Protocol that prostitution and other forms of sexual exploitation cannot be considered labour, forced or otherwise.

Section 2 defines offences of “Human trafficking.” Subsection 1 is key. We reproduce its text in full here:

*“A person commits an offence if the person arranges or facilitates the **travel** of another person (“V”) **with a view to V being exploited.**” [Our emphasis]*

Subsection 3 includes recruiting, harbouring and receiving the victim but only in respect to arranging or facilitating their **travel**.

If there is no travel, the definition of the offence of human trafficking is not met. This hollows out the sophisticated Palermo Protocol definition and centres the offence on the **movement** of the victim, rather their continued exploitation.

Section 3 defines the “Meaning of Exploitation” in relation to Section 2. This has subsections defining five different types of exploitation, one of which is “Sexual exploitation.” This is defined as the committing of an offence under Section 1(1)(a) of the Protection of Children Act 1978 or Part 1 of the Sexual Offences Act 2003.

The other four types of exploitation are:

- “Slavery, servitude and forced or compulsory labour” as defined in Section 1.
- “Removal of organs etc.”
- “Securing services etc by force, threats or deception.”
- “Securing services etc from children and vulnerable persons”

One of the stated aims of the Modern Slavery Act was to consolidate existing offences into one Act. It has done this for all of the types of human trafficking and ‘modern slavery’ **except** sex trafficking, which is the most common form in Europe, whose victims are overwhelmingly female, and in which the human rights violations are particularly egregious.

Part 1 of the Sexual Offences Act 2003 covers a long list of offences, including rape and sexual assault of adults and children, paying for sexual services of a child or of an adult subject to force, and controlling prostitution for gain and controlling a child in relation to sexual exploitation.

Without doubt these are vile offences, but defining sexual exploitation in relation to sex trafficking in this way sends a confused and confusing message. This is in strong contrast to the Palermo Protocol definition, which clearly focuses the offence on exploiting (i.e. profiting from) a person’s prostitution or other forms of sexual exploitation (e.g. making pornography) and thus keeps the motive for sex trafficking firmly in mind – the obscene amounts of money that can be made. As [Tony Talbot](#)⁵ put it in his TED Talk:

“Human trafficking is insanely profitable. If you really think about it, you can sell a kilo of heroin once; you can sell a 13-year-old girl 20 times a night, 365 days a year.”

It is these profits that motivate the traffickers, but the way the offences are defined in the MSA obscures this. And that makes it harder to see what needs to be done to stop it.

When we understand that it's the profits that can be made from prostitution that drive the traffickers, it's easy to see that to stop them, we need to stop men buying women in prostitution.

But when the legislation defines the offence as arranging a woman's travel "with a view to" raping, assaulting or violating her in some other way in another location, the traffickers are implicitly framed as irrationally and uniquely evil and outside the norm – when in fact, they are ordinary people wanting to make a fast buck, particularly now that in many communities there are few legitimate opportunities for making a decent living and prostitution is increasingly normalised and sanitised.

This has profound implications, not only for how the criminal justice system deals (or doesn't deal) with these crimes, but also for how society understands prostitution and sex trafficking.

Our understanding of subsection (5) is that it is intended to cover situations where the victim is forced to perform services that fall short of 'forced labour,' and could include, for example, delivering drugs, begging or prostitution. However, including prostitution here again incorrectly frames it as a 'service' (i.e. a form of labour) rather than something that someone does to the victim. Having one's mouth, vagina or anus penetrated by a stranger's penis can never legitimately be considered a service.

Subsection (6) expands on subsection (5) when the victim is a child or vulnerable adult and requires a direct comparison with an adult or someone without the specific vulnerability. This is deeply problematic. First because the Palermo Protocol is clear that when the victim is under 18, no such test is required. Secondly because it is much more limited than the 'abuse of power or of a position of vulnerability' wording in the Palermo Protocol definition and it obscures the intersecting structural and cultural power inequalities within society that make it easy for those who are in more favourable positions within those hierarchies (for example, adult males) to take advantage of those in less favourable positions (for example, poor young females and poor young females of colour).

Conclusion: The forms of exploitation specified in the Palermo Protocol definition of which men and boys are most likely to be victims can be prosecuted straight-forwardly as 'modern slavery' under Section 1. But the forms of exploitation of which women and girls are most likely to be victim do not fall clearly under Section 1.

To achieve conviction under the MSA, cases of sex trafficking must either be centred on the victim's travel, or the exploitation of her prostitution must be framed as forced labour or services. Both of these options are more complicated than bringing a case of forced labour on a farm, for example.

When human trafficking is for the purpose of sexual exploitation, the violation is two-fold – the human rights violation of being treated as a commodity that can be bought and sold for another person's profit and the violation of the human right to dignity and bodily integrity in

prostitution itself. This parallels the double violation in human trafficking for the purpose of organ removal.

The MSA is therefore not only profoundly sexist, it also implicitly normalises and trivialises prostitution, and positions it as a form of work. As a result the vast majority of sex traffickers are not prosecuted, giving them virtual impunity, and their victims are unrecognised and unsupported.

Moreover the Act fails to send out a clear, easy-to-understand message to society and by obfuscating the true nature of sex trafficking, it obscures the measures that are required to prevent it. This implicitly exonerates the Government from taking holistic measures to address the underlying causes. We are already seeing the catastrophic consequences for women and girls.

How the sex trafficking legislation works in practice: We will use a case study from the [CPS VAWG Report 2016-17](#)⁶ to illustrate some of the disastrous consequences of the failure to use the UN definition of sex trafficking in the MSA:

*“Three defendants forced a group of Hungarian women to **work** as prostitutes. The women were trafficked to the UK with the promise of legitimate jobs. Their identity documents were taken and they were forced into **sex work**. Two of the women had up to ten **customers** every day, while a third was ordered to **have sex** with men at car washes. The victims, who were aged between 19 and 24, came from poor backgrounds and spoke little or no English. One of the defendants convinced two of the women that he was in a romantic relationship with them in order to manipulate them. The defendants were convicted – one was sentenced to over 13 years’ imprisonment; the second to over eight years for human trafficking and forcing prostitution and the third was sentenced to over three years for controlling of prostitution for gain.” [Our emphasis.]*

The women are young and vulnerable. They are in a foreign country and speak little or no English. The defendants receive and harbour them, possibly transport them, exploit their vulnerability and use deception (the promise of legitimate jobs, pretence of a romantic relationship), coercion (stealing of documents) and force – all for the purpose of exploiting their prostitution. Clearly this meets the UN definition of sex trafficking but apparently only one (or two – the text is unclear) of the defendants were convicted as such.

By framing “travel” as the central feature of human trafficking, the more serious and damaging crime – in human and social terms – of the ongoing exploitation of the prostitution of these young women, is reduced to secondary status, in contravention of binding obligations to implement the terms of the Palermo Protocol. Moreover prostitution itself is reframed as ‘work,’ ‘sex work’ or ‘having sex’ – as if being penetrated (i.e. raped) by multiple men every day is equivalent to working as a waitress. And those rapists are defined as ‘customers’ and rape is defined as consensual sex.

The third defendant was “sentenced to over three years for controlling prostitution for gain.” That he controlled her, implies that he used some form of force or coercion, or abuse of his power or her vulnerability, meeting the ‘means’ element. That he was in a position to do this,

implies that he'd recruited, harboured or received her, which meets the 'act' element. That he was gaining from her prostitution by definition meets the 'purpose' element. The third defendant's crime therefore meets the Palermo Protocol definition of sex trafficking. But he was only sentenced to around **three years** for 'controlling prostitution for gain,' sending out the message it was a relatively trivial offence, comparable in seriousness to shoplifting – and not a most serious human rights violation.

Press [reports](#)⁷ of [other cases](#),⁸ suggest that people whose crimes meet the Palermo Protocol definition of sex trafficking are routinely being convicted of 'controlling prostitution for gain' and sentenced to relative short prison terms, and a trafficking conviction is only secured for those who can be proved to have organised the victim's travel. Moreover there are relatively few prosecutions for controlling prostitution for gain as we explain below.

This means that the extent of sex trafficking in England and Wales is vastly underestimated, most victims go unrecognised, and most perpetrators have almost total impunity.

2. National Referral Mechanism (NRM)

The NRM is the identification and support system for victims of human trafficking. Its [guidance](#)⁹ uses a different definition of human trafficking from the MSA, conforming more closely to the Palermo Protocol definition, but with the addition of an element requiring the movement of the victim.

These and similar anomalies show that the Government must be aware that the definition of human trafficking in the MSA does not meet obligations under the Palermo Protocol.

This is of profound concern and inevitably means that the true extent of sex trafficking in England and Wales is vastly underestimated and most victims go unrecognised and unsupported.

3. Preventing sex trafficking

Article 9 of the Palermo Protocol places an obligation on ratifying states to prevent human trafficking, including taking measures to address the poverty and inequality that makes people, especially women and children, vulnerable to being trafficked, and to discourage the demand for prostitution that drives sex trafficking. The Government is abjectly failing on both these fronts.

There is abundant evidence that the UK Government's economic measures have had a disproportionate impact on women and have led to a worsening of the inequality between the sexes. The [Women's Budget Group](#)¹⁰ has shown that **every budget since 2010** has impacted unfairly on women, particularly lone mothers, and BAME and disabled women. As a result, large numbers of women are in desperate poverty, making them vulnerable to being pimped and sex trafficked.

There is also evidence that increasing numbers of women are turning to [prostitution](#)¹¹ as a last resort against destitution, and that the same forces are making it increasingly difficult for women to leave prostitution.

All of this is happening not only with the full complicity of the Government, but as a direct result of their policies. This is a catastrophe for women.

Regarding the obligation to discourage men's demand for sexual access to women and girls in prostitution, we are not aware of any systematic or proactive effort by the UK Government to address this in England and Wales. For example, we have seen no public information campaigns aimed at men and boys discouraging prostitution-buying, and the legislation that is aimed at sex buyers is barely used.

There are three pieces of legislation in England and Wales that can be used against sex buyers to discourage demand:

- **Section 51A of the Sexual Offences Act 2003** – Known as the 'kerb crawling' offence, this makes it an offence for someone to solicit another in a public place with aim of obtaining a sexual service. There were 106 prosecutions for this offence in the year 2017-2018. It is not surprising that there were so few prosecutions, because both [National Guidance](#)¹² for policing prostitution and the Crown Prosecution Service (CPS) [guidance](#)¹³ recommend against using it.
- **Section 53A of the Sexual Offences Act 2003** – This was introduced in 2009 to make the law compliant with the Palermo Protocol obligation to suppress men's demand. It makes it an offence to buy sex from someone who's been forced, coerced, or deceived into it. There are a number of [contradictions](#)¹⁴ within the framing of this law that make its ineffectiveness inevitable – although it was used successfully in its first year. It has now fallen into disuse and there was only one prosecution in the year 2017-2018.
- **Section 47 of the Sexual Offences Act 2003** – This makes it an offence to pay for the sexual services of a person under 18. If the child is between 13 and 17, the accused can say he didn't know she was under 18. There were 57 prosecutions under this offence in the year 2017-2018.

This makes a total of 164 prosecutions for offences related to purchasing women and children in prostitution. This amounts to virtual impunity for men buying sex, given that Home Affairs Select Committee [estimates](#)¹⁵ suggest that nearly two million British men pay for 'sex' every week.

The Government is therefore clearly abrogating its duty to take effective measures to prevent sex trafficking.

Figures for prosecutions are taken from the 2017-2018 [CPS VAWG Report](#).¹⁶

4. Prostitution as VAWG

Prostitution is glamorised and trivialised within our pornified and hyper-sexualised culture, and a powerful lobby of vested interests is pushing for prostitution to be accepted as ordinary work that can be opened up to the capitalist markets without restriction.

But prostitution is not a value-free institution. Study after study has shown that it is damaging both to those in it and to society more generally. For example, a [meta-study](#)¹⁷ found that violence is a prominent feature of prostitution in all settings and that it entrenches women's disadvantages and social exclusion, and shores up the inequality between the sexes.

The Women and Equalities Select Committee conducted an inquiry into the sexual harassment of women and girls in public places. One of their key [findings](#)¹⁸ was the connection between the acceptance of men's use of women in prostitution and men's acceptance of sexual harassment of women and girls in public places.

A [UN multi-country study](#)¹⁹ found that men perpetrating rape of non-partners and violence against intimate partners are associated with prostitution-buying. Studies of [punters](#)²⁰ (sex buyers) have found they are more likely to commit rape and other aggressive sexual acts. In addition, the contempt they have for women is borne out by [survivor testimony](#)²¹ and research on [punter forums](#).²²

Clearly then, prostitution is both a cause and a consequence of the inequality between the sexes and of the epidemic of male VAWG that we are currently witnessing.

The understanding that prostitution is incompatible with the dignity and worth of the human person was formally recognised by the UN in the 1949 [Convention](#)²³ for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others. While the UK has not ratified this convention, its adoption by the General Assembly means the UN recognises prostitution *per se* as a human rights violation.

It is on this understanding that Nordic Model Now! bases our activism. We [collate](#)²⁴ first-person accounts from women who have lived experience of prostitution. For example, this is how one of our members described her recent experiences in prostitution – which she turned to out of [financial desperation](#):²⁵

“People think prostitution is about having consensual sex for money. It’s not. Those men don’t want to pay for that. They paid me and then used me however they wanted. I was beaten with objects until I bled; spat at; anally raped; gang raped; passed around at sex parties like a toy, men slipping off their condoms; I was shouted at, threatened, choked, told to look like I enjoyed it or he’d take the money back. I was scared every single second. But the only thing that scared me more was being street homeless, so I saw no choice other than to put up with it until I could clear my rent arrears.”

This surely fits the definition of ‘cruel, inhuman or degrading treatment’ in Article 16 of the Convention, if not the definition of ‘torture’ as defined in Article 1.

The Government therefore has responsibilities to ensure that prostitution is not normalised, is not considered a valid solution for women facing destitution, is clearly framed as a human rights abuse, and to prevent third parties from profiting from it (as required by Article 6 of [CEDAW](#)²⁶).

The UK Government is currently failing all of these responsibilities and is therefore complicit. We have shown that the MSA intrinsically normalises and trivialises prostitution,

and that austerity measures are leaving women with no option but to turn to prostitution as a last resort against destitution, and we provide other evidence of the UK Government's inability or unwillingness to fulfil these obligations below.

5. Profiting from women's prostitution

The phrase "exploitation of prostitution of women" in CEDAW Article 6 [means](#)²⁷ profiting from a woman's prostitution. However, the Government has incorrectly narrowed its understanding of the phrase to cover only 'exploitative practices.' For example, in its Ending VAWG [Strategy](#)²⁸ the Government says it is "committed to tackling the harm and exploitation that can be associated with prostitution." This implies that the Government does not recognise prostitution as inherently harmful and a human rights abuse, nor that it has an obligation to prevent people from profiting from women's prostitution.

Pimping and brothel keeping in England and Wales come under the Sexual Offences Acts of [2003](#)²⁹ and [1956](#),³⁰ but the relevant offences have low maximum sentences that are similar to the penalties for shoplifting, thus implying they are relatively trivial offences – even though the [vast majority of cases](#)³¹ meet the Palermo Protocol definition of sex trafficking.

Moreover the 'Controlling prostitution for gain' offence does not cover individuals who profit from a woman's prostitution without maintaining control over her. This means that the law in England and Wales does not effectively prohibit those who profit from women's prostitution when it is not possible to prove control.

[National Guidance](#)³² for policing prostitution is focused on 'organised crime' – meaning the common practice of British men pimping out their girlfriends and wives is seldom punished and the vast majority of brothels operate freely in plain sight. The guidance advises police forces **against** using the law to target pimps and brothel keepers, unless, for example, there is evidence of 'organised crime'. This is echoed in the Crown Prosecution Service (CPS) [guidance](#).³³

That prosecuting pimping and brothel keeping offences is not prioritised is reflected in the [CPS VAWG Report](#).³⁴ In the year 2017-2018, there were only 96 prosecutions for controlling prostitution for gain and 73 for brothel keeping. To put this in context, a Police Foundation [study](#)³⁵ into organised crime in indoor prostitution identified 65 brothels in one medium-sized English city.

This means that those who profit from women's prostitution have virtual impunity, with the full complicity of the UK Government.

6. Prostitution of children

In 2015 all offences that relate to the prostitution of children [were changed](#)³⁶ to replace the word 'prostitution' with 'sexual exploitation.' This was done without correcting anomalies in the legislation, such as that the maximum penalty for controlling a child in relation to sexual exploitation is lower than human trafficking – even though, by definition, it meets the elements of the Palermo Protocol definition – and lower than paying for a child's 'sexual

services.’ As with adults, there is no specific offence of profiting from a child’s prostitution without an element of ‘control.’

All the offences in England and Wales relating to the sexual abuse and sexual exploitation of children 13-17 years old require the prosecution to prove not only that the child was under 18 but also that the accused *believed* she was. This is a get out of jail free card for male perpetrators.

7. Services for women in prostitution

Most Government spending on services for women in prostitution is focused on ‘harm reduction’ rather than providing women with genuine routes out. Many of the organisations that receive public funding and provide the services are ideologically committed to the full decriminalisation of the sex trade, including of pimps and brothel keepers, and see prostitution as a legitimate form of work. Services that are underpinned by these attitudes usually serve to prolong women’s involvement in prostitution and to maintain a thriving sex trade.

Because of the lack of services that provide material help to enable women to exit, and the increase in women’s poverty, the increasing inadequacy of the welfare system and the scarcity of decent employment opportunities for low skilled women, large numbers of women are trapped in prostitution with the complicity of the UK Government.

8. Recommendations

- Redraft the Modern Slavery Act so that it uses and implements the full Palermo Protocol definition.
- Introduce new offences of profiting from the prostitution of others.
- Ensure all offences involving the trafficking and sexual exploitation of a child under 18 years of age (including paying for “sexual services”) are strict liability offences.
- Redraft police and CPS guidance and priorities so that all third-party crimes relating to the prostitution of others are prioritised.
- Redraft the NRM rules and guidance so that the definitions of human trafficking of adults and children align fully with the Palermo Protocol definition.
- The introduction of a [Nordic Model](#)³⁷ style approach to prostitution. That is, measures to: repeal all laws targeted at those who are engaged in prostitution and wipe their criminal records for such; suppress men’s demand for prostitution by making buying sex *per se* a criminal offence; and a national network of high-quality services for those in prostitution that include genuine routes out.
- Comprehensive training and guidance for all relevant professionals (including police, CPS, social workers, etc.) on the use of the updated legislation.

- Urgent measures to address women’s poverty and inequality to reduce their vulnerability to being driven into prostitution and trafficked.

References

- ¹ <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- ² <http://www.ohchr.org/EN/ProfessionalInterest/Pages/ProtocolTraffickingInPersons.aspx>
- ³ http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=INT%2fCEDAW%2fAIS%2fGBR%2f34128&Lang=en
- ⁴ http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/542047/2016_07_31_Haughey_Review_of_Modern_Slavery_Act_-_final_1.0.pdf
- ⁵ <http://www.dailykos.com/stories/2014/10/31/1340777/--You-Can-Sell-A-Kilo-Once-You-Can-Sell-A-13-Year-Old-Girl-20-Times-A-Night-American-Slavery>
- ⁶ http://www.cps.gov.uk/sites/default/files/documents/publications/cps-vawg-report-2017_1.pdf
- ⁷ <http://www.keighleynews.co.uk/news/national/15023978.man-convicted-of-trafficking-women-brought-back-to-uk-for-prison-term/>
- ⁸ <http://www.telegraph.co.uk/news/2018/11/26/couple-deny-running-prostitute-racket-chelsea-cloisters-building/>
- ⁹ http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744070/victims-of-modern-slavery-competent-authority-v4.0-EXT.PDF
- ¹⁰ <http://wbg.org.uk/>
- ¹¹ <http://nordicmodelnow.org/2018/11/07/submission-to-un-special-rapporteur-on-extreme-poverty-human-rights-in-the-uk/>
- ¹² <http://library.college.police.uk/docs/appref/Sex-Work-and-Prostitution-Guidance-Jan-2019.pdf>
- ¹³ <http://www.cps.gov.uk/legal-guidance/prostitution-and-exploitation-prostitution>
- ¹⁴ <http://nordicmodelnow.org/facts-about-prostitution/fact-its-illegal-in-england-and-wales-to-buy-sex-from-someone-whos-been-coerced/>
- ¹⁵ <http://nordicmodelnow.org/2016/07/17/response-to-the-home-affairs-select-committees-interim-report-on-prostitution/>
- ¹⁶ <http://www.cps.gov.uk/sites/default/files/documents/publications/cps-vawg-report-2018.pdf>
- ¹⁷ http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/303927/A_Review_of_the_Literature_on_sex_workers_and_social_exclusion.pdf
- ¹⁸ <http://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/701/701.pdf>
- ¹⁹ <http://www.svri.org/sites/default/files/attachments/2016-07-19/RBAP-Gender-2013-P4P-VAW-Report-Summary.pdf>
- ²⁰ <http://prostitutionresearch.com/wp-content/uploads/2015/09/Comparing-Sex-Buyers-With-Men-Who-Do-Not-Buy-Sex.pdf>
- ²¹ <http://nordicmodelnow.org/testimonial/>
- ²² <http://nordicmodelnow.org/myths-about-prostitution/myth-punters-care-about-the-women-they-buy/>
- ²³ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/TrafficInPersons.aspx>
- ²⁴ <http://nordicmodelnow.org/2018/09/08/survivors-speak-out-about-what-prostitution-is-really-like/>
- ²⁵ <http://nordicmodelnow.org/2018/11/07/submission-to-un-special-rapporteur-on-extreme-poverty-human-rights-in-the-uk/>
- ²⁶ <http://www.un.org/womenwatch/daw/cedaw/text/econvention.htm>
- ²⁷ http://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/GBR/INT_CEDAW_ICO_GBR_31464_E.pdf
- ²⁸ http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAW_G_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF
- ²⁹ <http://www.legislation.gov.uk/ukpga/2003/42/contents>
- ³⁰ <http://www.legislation.gov.uk/ukpga/Eliz2/4-5/69>
- ³¹ <http://nordicmodelnow.org/facts-about-prostitution/fact-human-trafficking-means-trading-in-human-beings/>

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- ³² <http://library.college.police.uk/docs/appref/Sex-Work-and-Prostitution-Guidance-Jan-2019.pdf>
- ³³ <http://www.cps.gov.uk/legal-guidance/prostitution-and-exploitation-prostitution>
- ³⁴ <http://www.cps.gov.uk/sites/default/files/documents/publications/cps-vawg-report-2018.pdf>
- ³⁵ http://www.police-foundation.org.uk/2017/wp-content/uploads/2017/06/organised_crime_and_the_adult_sex_market.pdf
- ³⁶ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/home-affairs-committee/modern-slavery/written/88821.pdf>
- ³⁷ <http://nordicmodelnow.org/what-is-the-nordic-model/>