

Alternative UK CEDAW Report from Nordic Model Now! and 12 other UK NGOs

June 2018

This report relates to the United Kingdom of Great Britain and Northern Ireland (UK). It focuses on the lack of progress in implementing some aspects of CEDAW that we do not believe are covered elsewhere.

This report is from the following groups and organisations:

- Nordic Model Now!
- Campaign Against Sex Robots
- Not Buying It!
- End Online Misogyny
- Judith Trust
- JURIES
- Manchester Feminist Network
- Mayday4Women
- Not for Sale in Scotland
- OBJECT
- Older Feminist Network
- Resist Porn Culture
- Women's Rights Action Group (Cambridge)

There is a short description of each of these organisations at the end of this document.

1. Article 6 – Exploitation of women

1.1. The primary anti-trafficking legislation in England and Wales is in the [Modern Slavery Act](#)¹ (the Act). This does not use the international definition of human trafficking in the Palermo Trafficking [Protocol](#)² and the Council of Europe [Convention](#)³ on Action against Trafficking, both of which the UK has ratified and therefore has an obligation to implement.

1.2. Instead the Act separates out “slavery, servitude and forced labour” as separate offences from trafficking, making it possible to prosecute them as “modern slavery.”

1.3. The Act defines “human trafficking” as follows:

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

1.4. This reveals an embarrassing [ignorance](#)⁴ of the fact that the dictionary definition of trafficking is *dealing or trading in something illegal* and nothing to do with *travel*.

- 1.5. The definition of “exploitation” in the Act includes “slavery, servitude or forced labour” and “sexual exploitation.” The latter is defined as something that involves an offence under Section 1(1)a of the Protection of Children Act 1978 or Part 1 of the Sexual Offences Act 2003, rather than the clear and unambiguous “exploitation of the prostitution of others or other forms of sexual exploitation” in the international definition.
- 1.6. This is entirely inadequate. It makes successful prosecution of sex trafficking (the vast majority of whose victims are female) significantly more complicated than “slavery, servitude and forced labour” (whose victims are more likely to be male).
- 1.7. The Act replaces the exquisitely simple “the abuse of power or of a position of vulnerability” in the international definition with a more limited clause that requires a direct comparison with someone without the specific vulnerability. This obscures the intersecting structural inequalities that make it so easy for those 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 makes it hard to get convictions.
- 1.8. Under the Act the exploitation of a person’s prostitution is **not** a crime – only organising their travel “with a view” to exploiting them is. However, forced labour and servitude are crimes in their own right.
- 1.9. Thus the Act sends out the message that exploiting someone’s forced labour on a farm (for example) is a crime but exploiting a woman’s prostitution is not. This is particularly egregious given that unlike farming, prostitution is [recognised](#)⁵ by the UN to be incompatible with human dignity, and Article 6 explicitly requires the suppression of the exploitation of women’s prostitution.
- 1.10. By making sex trafficking more complicated and difficult to prosecute than “slavery, servitude and forced labour,” the Act discriminates against females and fails to meet obligations under Article 6.
- 1.11. Under the heading “Tackling Prostitution,” the Eighth periodic CEDAW [report](#)⁶ from the UK Government states:

“58. UK Government is [i] committed to tackling the harm and exploitation that can be associated with prostitution, and [ii] believes that people who want to leave prostitution should be given every opportunity to find routes out. [iii] The Home Office continues to work closely with the police, Crown Prosecution Service (CPS), other front-line agencies and wider partners to ensure that legislation achieves these aims. [iv] In the Home Office’s response to the Home Affairs Select Committee (HASC) interim report on prostitution²⁵, the Government recognises the need to gather a robust evidence base on the nature and prevalence of sex work in England and Wales, and believes that we cannot properly assess the impact of the other recommendations until this research has been completed.” **[Numbers added]**

This reveals many weaknesses in the Government's strategy as we explain for each numbered point below.

- 1.12. (i) The Government states it is committed to “*tackling the harm and exploitation that can be associated with prostitution*”. This wording implies that the Government does not view prostitution as inherently damaging and has a very different meaning from Article 6, which places an obligation on states to “suppress all forms of [...] exploitation of prostitution of women.”
- 1.13. According to the [Oxford English Dictionary](#),⁷ the word “exploitation” in the phrase “exploitation of prostitution of women” means making use of, benefiting from, or taking unfair advantage of the prostitution of women. This implicitly includes **profiting** from a woman's prostitution, through brothel keeping, pimping, “living off the earnings,” and other forms of profiteering, such as profiting from advertising prostitution.
- 1.14. In the phrase, “*tackling the harm and exploitation that can be associated with prostitution*,” “exploitation” has a different meaning. In this context “exploitation” means “treating someone unfairly in order to benefit from their work,” and does not cover profiteering unless there are aggravating features.
- 1.15. This reveals that the Government does not acknowledge its obligations under Article 6 to prohibit profiteering *per se*, and lacks political will to meet those obligations.
- 1.16. We have shown that the Modern Slavery Act does not recognise the “exploitation of prostitution of women” as a separate crime and so it is of no use for prosecuting profiteering unless “travel” is involved and can be proven.
- 1.17. Pimping and brothel keeping come under the Sexual Offences Acts 2003 and 1956, in which the relevant offences have maximum sentences of only six months or seven years, depending on whether they are prosecuted in the magistrates or crown court.
- 1.18. In fact the maximum sentences are seldom used. For example, [Phillip Stubbs](#),⁸ who was found guilty of two counts of brothel keeping at Bristol Crown Court in 2015, received only a two-year **suspended sentence** and 250 hours of community service. This in spite of the fact he appears to have made a vast fortune from exploiting the prostitution of women:

*“During a raid at his farm in March 2012, officers discovered **more than 100 cars – including Mercedes, Bentleys and Lamborghinis – in a temperature controlled basement, as well as an indoor swimming pool.**”* [Emphasis added]
- 1.19. Moreover, prosecutions are rare. The [crime statistics](#)⁹ for England and Wales show that in the year 2016-2017 there were only 99 prosecutions for “controlling prostitution,” 90 for brothel keeping, and 162 for sex trafficking. This during a period when police [research](#)¹⁰ identified 65 brothels in **one smaller English city alone**.

- 1.20. The low penalties and rarity of prosecutions mean pimps and brothel keepers have almost complete impunity in England and Wales – in direct contravention to obligations under Article 6.
- 1.21. It is also notable that profiting from the advertising of another person’s prostitution is not a crime, even though websites advertising prostitution are extremely lucrative.
- 1.22. **(ii)** The Government claims it “*believes that people who want to leave prostitution should be given every opportunity to find routes out.*” One wonders who the Government thinks should provide these opportunities, given that they have overseen the systematic removal of funding from women’s [refuges](#),¹¹ specialist [counselling](#)¹² services and [exiting support](#),¹³ without which exiting prostitution can be hard, if not impossible.
- 1.23. Such services as are available for prostituted women are mostly run by organisations that see prostitution as work and take a so-called “harm reduction” approach providing [little](#),¹⁴ if any, substantive assistance to exit, thus tending to keep women stuck in prostitution.
- 1.24. In addition [welfare](#)¹⁵ cuts, changes and sanctions are driving many women, particularly single mothers, into prostitution and making it hard, if not impossible, for them to exit.
- 1.25. **(iii)** “*The Home Office continues to work closely with the police, Crown Prosecution Service (CPS), other front-line agencies and wider partners to ensure that legislation achieves these aims.*” In view of the ineffective legislation, lack of funding for exiting services for prostituted women, and absence of commitment to prioritising the policing and prosecution of pimping and brothel keeping, this can only be interpreted as more hot air.
- 1.26. **(iv)** “*In the Home Office’s response to the Home Affairs Select Committee (HASC) interim report on prostitution, the Government recognises the need to gather a robust evidence base on the nature and prevalence of sex work in England and Wales, and believes that we cannot properly assess the impact of the other recommendations until this research has been completed.*”

The interim report into the HASC inquiry into prostitution was significantly [biased](#).¹⁶ For example, it does not reference CEDAW or the Palermo Trafficking Protocol, even though both were mentioned and their significance explained in written submissions. Concerns expressed to the inquiry about the harms of prostitution and its detrimental impact on sex equality were written off as “moral values” and “emotive” reactions, while the report claimed a position of neutrality – which was very clearly lacking.

- 1.27. Shortly after the interim report was published, Keith Vaz, the inquiry’s chairperson, was [caught](#)¹⁷ in the act of buying sexual access to two vulnerable young migrant men. This means he had a clear and direct conflict of interest, because one of the stated [aims](#)¹⁸ of the inquiry was to look into whether buying sex should be criminalised.

- 1.28. In chairing the inquiry as a sex buyer, Vaz broke parliamentary [rules](#) ¹⁹ on conflicts of interests, for which, shamefully, he has not been held to account.
- 1.29. We called for the interim report to be scrapped and its evidence to be re-examined with a newly convened committee using a gendered analysis and a lens of human rights obligations. The Home Office ignored us and instead granted it respectability and legitimacy through an official response without criticism. And it does so again by mentioning the interim report here and implying it will consider its recommendations after the research is completed.
- 1.30. The HASC interim report is frequently used as [evidence](#) ²⁰ by sex industry lobbyists for the full decriminalisation of the entire sex trade, including profiteers.
- 1.31. We are dismayed at the Government's [specification](#) ²¹ for the research it has commissioned, including its use of the terms "sex work" and "sex worker" which implicitly frame prostitution as a labour issue rather than violence against women and girls (VAWG).
- 1.32. The specification includes the awful phrase, "those trafficked for the purposes of sex work," which shows the pernicious influence of the Modern Slavery Act's redefinition of sex trafficking to be "travel." We cannot over-emphasise the seriousness of this.
- 1.33. The specification says "sex workers" are key stakeholders in the research. While it is right and proper that those with direct experience of prostitution should be involved in the research, it is of concern that the specification does not define "sex worker."
- 1.34. It is notable that the English Collective of Prostitutes (ECP), National Ugly Mugs, and SCOT-PEP, three of the most vocal and well-funded and well-organised UK NGOs lobbying for the full decriminalisation of the sex trade are members of the Global Network of Sex Work Projects (NSWP).
- 1.35. The NSWP lobbies for prostitution to be considered regular work and for the full decriminalisation of the sex trade. All member organisations must agree to these [aims](#).²²
- 1.36. The NSWP claims to be a "sex worker led" global network representing thousands of "sex workers." However, its [website](#) ²³ clearly states that: "sex workers can be employees, **employers**, or independent workers and participate in a range of other work-related relationships with third parties." [Our emphasis.] In other words it considers "employers" (i.e. pimps and profiteers) to be "sex workers."
- 1.37. The former Vice President of NSWP was a pimp. Her name is Alejandra Gil and she's now serving a 15 year sentence for [sex trafficking](#).²⁴
- 1.38. It is of grave concern therefore that these and similar organisations are able to influence Government policy and potentially its latest research.
- 1.39. Section 14 of the [Policing and Crime Act 2009](#) ²⁵ introduced a crime of buying sex from someone who has been forced, coerced or deceived. The maximum sentence is a level 3 fine. Although there were prosecutions in the first few years, it has fallen [out of](#)

[use](#).²⁶ We believe this is because of the amount of police effort required to bring a successful prosecution [relative](#)²⁷ to the low penalty.

- 1.40. However, this law is an important milestone because it legally recognises that buying sex from someone who's been forced etc. is wrong. That it has been ineffective is a strong argument for a crime of purchasing sex *per se*.
- 1.41. New forms of technology, including female anthropomorphic sex dolls and robots, are changing how prostituted women are treated, and the kinds of acts they are expected to perform. Prostituted women can now be bought online, with punters paying for acts to be carried out by third-party agents. Legislation must recognise that prostituted women are increasingly vulnerable to new forms of dehumanisation.
- 1.42. The rise of 'sex doll brothels' across Europe is a worrying sign of things to come. Rather than decreasing prostitution, as their advocates suggest, sex doll brothels further reinforce the idea that prostituted women are commodities.
- 1.43. Anthropomorphic sex dolls and robots are proposed as a solution to the rise of the incels (involuntary celibates) generation of alienated and disenfranchised men. But advocates fail to recognise that these problems are a product of the culture where the sexual objectification of women is normalised and how this leads to a failure to build intimate mutual attachments. A [report](#)²⁸ in the British Medical Journal challenges the claimed benefits of sex robots, arguing that their advocates ignore real potential harms. There are also concerns about genital infections, female objectification and male isolation.
- 1.44. Recommendations to the Government:
 - 1.44.1. Address the shortcomings in the Modern Slavery Act set out above and bring it into line with obligations under CEDAW and the Palermo Protocol.
 - 1.44.2. Address the pimping and brothel keeping legislation so that penalties serve as a real deterrent. If forced labour etc. are retained as standalone offences in the Modern Slavery Act, profiting from (or otherwise exploiting) a person's prostitution must also be included as a standalone offence.
 - 1.44.3. Introduce legislation to make advertising another person's prostitution a criminal offence with penalties that act as a real deterrent.
 - 1.44.4. Ring-fenced funding for a nationwide network of high-quality services run by women on feminist principles for those involved in prostitution, to include advocacy, exiting help, psychosocial support, addiction services, refuges, childcare, housing, training and employment opportunities.
 - 1.44.5. Address the negative impact that welfare changes, cuts and sanctions are having on women and children so that no one is left in destitution with prostitution as the only resort.

- 1.44.6. Prioritise the policing and prosecution of sex trafficking and profiteering from prostitution as nationwide policy.
- 1.44.7. Invest in police, prosecution and court services so that lack of resources do not cause failure.
- 1.44.8. Publicly acknowledge that the HASC interim report was fatally flawed and contaminated by Vaz's conflict of interests and mark the report as rejected so it cannot reasonably be used as evidence for the decriminalisation of brothels or even of the entire sex trade.
- 1.44.9. A high-quality public information campaign and education in schools about the harms of prostitution.
- 1.44.10. Introduce legislation to make the purchase or attempted purchase of sex a criminal offence. With the other changes recommended above, this would bring the law into line with the Nordic Model approach.

2. Articles 1-4: Approach to tackling discrimination and advancing gender equality

- 2.1. There is ample evidence that the Government's approach to tackling discrimination against women and advancing sex equality is not working. Over the past eight years it has presided over the systematic [withdrawal](#)²⁹ of economic and social resources from women with the result that the position of women relative to men is significantly worse now than when they came to power in 2010. This has driven many women into destitution, and hence prostitution as a last resort. And it is no surprise therefore that male VAWG is at [record levels](#).³⁰
- 2.2. Rectifying this requires a gender mainstreaming approach and immediate steps to redress this worsening inequality.
- 2.3. The Public Sector Equality Duty (PSED) which was introduced as part of the [Equality Act 2010](#)³¹ *should* enable a gender mainstreaming approach in Government departments and public bodies, but it is weak and not working in practice.
- 2.4. For example, the Women's Budget Group in its [report](#)³² on the 2017 Autumn Budget said the Government "failed to provide evidence that it has met its obligations under the PSED to have due regard to the impact of its policies on equality by publishing a comprehensive equality impact assessment of the measures included in this Budget."
- 2.5. When a core Government department fails to take seriously its obligations under the PSED, it's no surprise that other departments and public bodies follow suit.
- 2.6. Many bodies interpret the sex equality duty incorrectly as a requirement for gender-neutral provisions, not realising that these nearly always benefit men at the expense of women and therefore exacerbate sex inequality. For example, the commissioning of gender-neutral provisions for victims of male violence is leading to the [loss](#)³³ of

oversubscribed services for female victims due to the provision of services for the much fewer male victims, whose needs are usually quite different.

- 2.7. The “Equality Statement” in the Government’s recent [consultation](#) ³⁴ on its proposed Domestic Abuse Bill provides an excellent example of the Government’s lack of understanding that gender-based VAWG is both a cause and a consequence of sex inequality, and therefore taking measures to hold male perpetrators to account and support female victims is a step towards addressing sex inequality. Instead a key consideration appears to be whether the Bill might be interpreted as discrimination against perpetrators because they are mostly male.
- 2.8. Although the PSED includes provisions for advancing equality of opportunity and to foster good relations between persons who share a protected characteristic and those who don’t, there’s only a requirement to have “due regard” for such aims.
- 2.9. Government [guidance](#) ³⁵ states that there is no requirement to conduct formal impact assessments and [that](#) ³⁶ “The specific duties do not require public bodies to prepare or publish equality schemes, equality action plans, equality impact assessments, or separate annual reports on equality.”
- 2.10. Recommendations to the Government:
 - 2.10.1. Strengthen the PSED to include a stronger obligation – for example, replace “due regard for” with “take reasonable steps to” advance equality and foster good relations and address the historical disadvantaging of women and girls and to make equality schemes, action plans, and impact assessments mandatory.
 - 2.10.2. Create new stronger statutory guidance on gender mainstreaming and using the PSED to promote sex equality.
 - 2.10.3. Hire gender mainstreaming experts to train policy makers in all department so the Government can set an example by rigorously and wholeheartedly applying the PSED.
 - 2.10.4. Introduce a statutory mechanism for inspecting compliance with the PSED, and make Legal Aid available to people challenging failures to comply with it.
- 2.11. The Government has announced [proposals](#) ³⁷ to reform the [Gender Recognition Act](#) ³⁸ 2004 so people can self-define their “gender identity” through a simple administrative process. In practice this would mean that “gender identity” would become a person’s “legal sex” and effectively replace biological sex on birth certificates and other identity documents, and hence in all official and unofficial data.
- 2.12. This is already happening to a certain extent. For example, crimes committed by males who “identify” as women (but who have undergone no medical transition and have **not** changed their legal sex) are now routinely [recorded](#) ³⁹ as having been committed by women.

- 2.13. There is evidence that significantly larger numbers of people will take advantage of the proposed mechanism compared to the existing system. The transgender population of the UK is estimated⁴⁰ at 300,000 – 500,000, the majority of whom might be expected to take advantage of the proposed new system, compared to the approximately 300 per year who have used the existing system.⁴¹
- 2.14. This will make it impossible to disaggregate data accurately by sex and therefore to accurately measure progress or reversals in sex discrimination and gender-based VAWG.
- 2.15. We suspect there will be other unintended consequences that will have a negative impact on women, including the further erosion of women-only spaces and the obfuscation of the particular needs of women and girls.
- 2.16. Changing data recording and collection in this way will obscure sex inequality and may make it harder, if not impossible, to tackle. We therefore believe that these proposals stand in direct contravention to CEDAW and that another solution must be found.
- 2.17. We recommend the Government abandons the idea of a changeable category of “legal sex” and instead records a person’s sex, based on the incontrovertible biological evidence, and introduces an optional additional category of “gender identity.”

3. About us

Nordic Model Now! is a grassroots women’s group campaigning for the Nordic Model (also known as the Sex Buyer Law). This decriminalises those who are prostituted, provides services to help them exit, and makes sex buying a criminal offence, in order to change attitudes and reduce the demand that drives sex trafficking. The group has members from a variety of backgrounds and disciplines, including survivors of prostitution and child sexual exploitation. See <http://nordicmodelnow.org/>.

The **Campaign Against Sex Robots** is a non-profit group that campaigns against the development of robotic technologies shaped by inequalities and objectification of women and children. See <http://campaignagainstsexrobots.org/>.

Not Buying It is a not for profit group that challenges the objectification of women in the media and general culture. See <http://www.notbuyingit.org.uk/>.

End Online Misogyny is a campaign to highlight the widespread and violent nature of online violence against women and girls.

Judith Trust focuses its work on the problems faced by people who have both a learning disability and mental ill-health. See <http://www.judithtrust.org.uk/>.

JURIES is a campaign to introduce mandatory juror briefings on rape myths and realities in all rape, sexual assault and childhood sexual abuse trials. See <http://juriesunderstandingsv.wordpress.com/>.

Manchester Feminist Network is a women-only community group campaigning to end male violence and for sex equality. See <http://manchesterfeministnetwork.wordpress.com/>.

Mayday4Women is a radical feminist activist group based in the UK. Our goal is to work for women's liberation, and our current main focus is the fight against the institutionalisation of sex self-identification. See <http://www.mayday4women.com/>.

Not for Sale in Scotland is a group of those who are promoting and supporting ending demand for commercial sexual exploitation in Scotland. We are calling for it to be done through the introduction of a threefold legislation that 1. decriminalises those prostituted 2. criminalises those who buy them, and 3. provides support and exiting services.

OBJECT is an unfunded radical grass-roots women-led organisation focusing on the objectification of women across the board, specifically the links between pornography, prostitution, strip clubs, surrogacy and the transgender trend. See <http://www.objectnow.org/>.

Older Feminist Network was founded in 1982. We meet once a month in London, and six times a year we publish a Newsletter, which is read all over the UK, in Europe, the USA, and Australia. See <http://www.olderfeminist.org.uk/>.

Resist Porn Culture is a UK organisation dedicated to resisting the pornography industry and the pornification of our culture. See <http://www.resistpornculture.org/>.

Women's Rights Action Group (Cambridge) is a Cambridge-based feminist activist group. Our recent campaigns have been around the widespread impact of porn culture and the need for good quality Relationship and Sex Education (targeting Cambridge schools) which acknowledges power inequalities and aims for gender equality.

¹ <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

² <http://www.ohchr.org/EN/ProfessionalInterest/Pages/ProtocolTraffickingInPersons.aspx>

³ <http://rm.coe.int/168008371d>

⁴ <http://nordicmodelnow.org/facts-about-prostitution/fact-human-trafficking-means-trading-in-human-beings/>

⁵ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/TrafficInPersons.aspx>

⁶ [http://tbinternet.ohchr.org/Treaties/CEDAW/Shared Documents/GBR/CEDAW_C_GBR_8_7322_E.pdf](http://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/GBR/CEDAW_C_GBR_8_7322_E.pdf)

⁷ <http://en.oxforddictionaries.com/definition/exploitation>

⁸ <http://www.bristolpost.co.uk/news/bristol-news/man-who-ran-bristol-brothels-22481>

⁹ http://www.cps.gov.uk/sites/default/files/documents/publications/cps-vawg-report-2017_1.pdf

¹⁰ http://www.police-foundation.org.uk/2017/wp-content/uploads/2017/06/organised_crime_and_the_adult_sex_market.pdf

¹¹ <http://www.theguardian.com/society/2018/mar/23/council-funding-womens-refuges-cut-since-2010-england-wales-scotland>

¹² <http://www.brightonandhoveindependent.co.uk/news/health/funding-cut-for-women-s-counselling-service-1-8368919>

¹³ <http://www.commonwealhousing.org.uk/news/exit>

¹⁴ <http://nordicmodelnow.org/facts-about-prostitution/fact-women-often-struggle-to-leave-prostitution/>

¹⁵ <http://www.thestar.co.uk/news/sheffield-women-being-forced-into-prostitution-by-benefit-cuts-1-8213743>

¹⁶ <http://nordicmodelnow.org/2016/07/17/response-to-the-home-affairs-select-committees-interim-report-on-prostitution/>

¹⁷ <http://www.mirror.co.uk/news/uk-news/married-mp-keith-vaz-tells-8763805>

¹⁸ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/home-affairs-committee/news-parliament-2015/160114-new-inquiry---prostitution/>

¹⁹ <http://publications.parliament.uk/pa/cm201012/cmcode/1885/188502.htm>

²⁰ <https://nordicmodelnow.org/2018/05/13/unison-conference-2018-vote-against-motion-127-decriminalisation-for-safety/>

²¹

http://www.whatdotheyknow.com/request/456208/response/1108953/attach/3/46828%20response.pdf?cookie_passthrough=1

²² <http://www.nswp.org/who-we-are>

²³ <http://www.nswp.org/resource/criminalisation-third-parties-and-its-impact-sex-workers-human-rights>

²⁴ <http://www.faber.co.uk/blog/a-human-rights-scandal-by-kat-banyard/>

²⁵ <http://www.legislation.gov.uk/ukpga/2009/26/contents>

²⁶ <http://www.theyworkforyou.com/wrans/?id=2018-04-23.HL7173.h&p=13564>

²⁷ <http://nordicmodelnow.org/facts-about-prostitution/fact-its-illegal-in-england-and-wales-to-buy-sex-from-someone-whos-been-coerced/>

²⁸ <http://srh.bmj.com/content/early/2018/04/24/bmj.srh-2017-200012>

²⁹ <http://nordicmodelnow.org/2018/04/10/submission-to-the-women-equalities-committees-inquiry-on-the-implementation-of-sdg5/>

³⁰ <http://www.theguardian.com/society/2016/sep/05/violent-crimes-against-women-in-england-and-wales-reach-record-high>

³¹ <http://www.legislation.gov.uk/ukpga/2010/15/contents>

³² <http://wbg.org.uk/analysis/chancellor-tinkering-margins-womens-budget-group-response-autumn-budget-2017/>

³³ <http://www.telegraph.co.uk/women/womens-life/11666990/Domestic-abuse-and-violence-is-not-gender-neutral.-Wake-up-Britain.html>

³⁴ http://consult.justice.gov.uk/homeoffice-moj/domestic-abuse-consultation/supporting_documents/Transforming%20the%20response%20to%20domestic%20abuse.pdf

³⁵

http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85041/equality-duty.pdf

³⁶

http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85049/specific-duties.pdf

³⁷ <http://www.theguardian.com/society/2017/oct/18/theresa-may-plans-to-let-people-change-gender-without-medical-checks>

³⁸ <http://www.legislation.gov.uk/ukpga/2004/7/contents>

³⁹ <http://transcrimeuk.com/>

⁴⁰ <http://www.equalityhumanrights.com/en/anghydraddoldeb-traws-wedi%E2%80%99i-adolygu/introduction-review>

⁴¹

http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/644443/tribunall-grc-statistics-q1-2017-18.pdf