

Written Evidence submitted by Dr Mary Laing, Lecturer in Sociology, University of York.

Executive summary

- My submission relates to 3 proposed amendments to the bill:
 - Amendment 1: Commercial sexual exploitation by a third party (A1)
 - Amendment 2: Commercial sexual exploitation (A2)
 - Amendment 3: Victims of commercial sexual exploitation (A3)
- My written evidence addresses each of these clauses in turn.
- I strongly urge members to oppose A1 and A2 as both have the potential to seriously harm sex workers.
- I strongly urge members to support A3 to repeal “Loitering or soliciting for purposes of prostitution”. The current criminalisation of sex workers through this law contributes to the harm and violence experienced by sex workers. It can also seriously hinder transition out of sex work into different forms of work.

Introduction

I am a criminologist at the University of York. I have been researching the sex industry for two decades and have researched and published on: sex work and technologies, non-heteronormative and queer sex work, sex work and health as well as safety and violence. I am a founding board member of National Ugly Mugs (now retired) and have experience supporting sex workers of diverse genders working in both on and off street contexts via specialist projects in Manchester, Liverpool, Newcastle upon Tyne and Vancouver, Canada. I regularly engage in knowledge exchange in policy contexts around sex work and the sex industry. I have experience consulting on sex work practice and policy at both the local and national level.

Main body

1. Amendment 1: Commercial sexual exploitation by a third party (A1)

1.0: This amendment contains two separate elements which I will take in turn. Firstly, A1 would criminalise: *‘those who “assist” or “facilitate” another person engaging in sexual activity for payment, where the assister/facilitator knows or ought to know such activity is taking place.’* **I strongly argue that members oppose this amendment**, as it has the potential to cause significant material harm to sex workers. Organisations offering vital support and harm minimisation services could be criminalised for their work; it could also mean that sex workers are nervous or are no longer able to access such services. The support networks of sex workers would be decimated, including relationships with co-workers (who would be criminalised), peers, friends and families who support people in the context of their work.

1.1: It would also be a crime to profit from sex work - this could potentially impact the families of sex workers, and is reminiscent of the law against ‘living off immoral earnings’ which was removed when the 2003 Sexual Offences Act was introduced. Additionally, businesses which provide day to day business services including banking, healthcare, web hosting or even taxis could be criminally liable. Sex workers are one of the most at risk, marginalised and stigmatised populations in the UK This could potentially mean that sex

workers are pushed to use the services of exploitative third parties. The clause also contradicts the recommendation of the [Financial Conduct Authority](#), who advised that banks should not close the accounts of sex workers, due to risks of significant harm attached to this. In sum this amendment would drive sex workers away from structures that make them safer. The amendment is also in direct opposition of [National Police Chief Council Guidance on Sex Work](#), published in April 2025, whose key focus is 'Creating Safer Spaces and recognising the importance of not increasing a person's overall vulnerability' (NPCC, 2025).

1.2: Secondly, A1 would: '*criminalise the publishing or display of any advertisement for sexual activity*'. **I strongly argue that members oppose this amendment** which seeks specifically to criminalise adult service websites (ASWs) which facilitate the advertisement of sex workers services. Firstly, criminalising these websites will not stop sex workers seeking out clients, so I urge members to reflect on the purpose of this amendment. It could also drive sex workers to advertise via unknown, risky third parties, remove them from more visible online spaces, and drive them towards more hidden, potentially dark web technologies where the risk of harm is high. This again directly contradicts 2025 National Police Chief Council Guidance, which specifically recognises that the hidden nature of the sex industry creates an environment which is conducive to abuse - something which this amendment would exacerbate ([NPCC: 2025](#)).

1.3: NPCC (2025) also states that police services will work actively alongside ASW's to identify and support trafficking victims; they also note that some ASW's have robust safeguarding systems to prevent trafficking and exploitation. The option to work alongside ASW's to identify genuine victims of trafficking would be lost if they were to be criminalised entirely. If sex workers are forced to move offline, or work via hidden/third party run/risky networks they will also lose access to support they have via online systems. Such systems might include vital peer and community support, support from specialist sex worker groups and organisations. They could lose vital safety tools for screening and assessing their clients before arranging appointments. In sum there is significant potential for harm against sex workers if this amendment was successfully introduced; and importantly there would be a much reduced capacity for the police to address trafficking and exploitation as it occurs.

2. Amendment 2: Commercial sexual exploitation (A2)

2.0: This amendment introduces an offence which makes it illegal for an individual to "*pay for, or attempt to, pay for sex either for themselves or on behalf of others*". **I strongly urge members to oppose this amendment.** This amendment seeks to introduce the Nordic Model in England and Wales and criminalise the purchase of sex. While we know that sex workers experience violence in their day to day lives, the way to address this is not through this amendment. A comprehensive systematic review of qualitative and quantitative evidence found that the criminalisation of sex work, including criminalising sex buyers is associated with a 'disproportionate risk of violence and sexual and emotional ill health' ([Platt et al. 2018](#))

2.1: Organisations that are both led by, and represent sex workers, as well as international organisations such as [Amnesty International](#), the [United Nations Working Group on](#)

[Discrimination against Women and Girls](#) the [World Health Organisation](#), oppose the Nordic Model on the basis of the harm it will cause to sex workers and instead support full decriminalisation.

2.2: The last major thorough investigation into sex work completed by the British Government was by the Home Affairs Select Committee in 2016. In their final report they note that they *'are not yet convinced that the sex buyer law would be effective in reducing demand or in improving the lives of sex workers, either in terms of the living conditions for those who continue to work in prostitution or the effectiveness of services to help them find new ways to earn a living.'* They also noted that *'there are indications that the law can be misused to harass and victimise sex workers who are the very people whom the law is seeking to protect.'* Further they state: *'we are not yet persuaded that the sex buyer law is effective in reducing, rather than simply displacing, demand for prostitution, or in helping the police to tackle the crime and exploitation associated with the sex industry'* ([Home Affairs Select Committee, 2016](#)). The report concludes recommending that the practice of sex workers sharing premises should be decriminalised, which they note should be considered as a 'matter of urgency'. This is in direct opposition of what A1 proposes. **I would therefore strongly urge members to oppose A1 on the basis that the Home Affairs Select Committee have already dismissed it as an appropriate approach.** There is no compelling evidence or reasons as to why this amendment would benefit or help sex workers now; in fact it would certainly add to the harm, risk and violence experienced by sex workers in their everyday lives.

2.3: Criminalising the purchase of sex has already been tried in one part of the UK – in Northern Ireland – where the Executive has accepted it has failed. [An official review commissioned by the Department of Justice](#) found that there was “no evidence that the offence of purchasing sexual services has produced a downward pressure on the demand for, or supply of, sexual services”. It also found that “the legislation has contributed to a climate whereby sex workers feel further marginalised and stigmatised”.

2.4: Criminalising clients increases the risk for sex workers. It reduces the ability of sex workers to screen clients and negotiate prices/services. There is no reliable evidence that the criminalisation of the purchase of sex reduces demand; and even when the purchase of sex is criminalised, sex workers will continue to offer their services but in much riskier and potentially more violent contexts. In criminalised contexts, it is highly likely that clients will refuse to provide personal details which is often part of sex workers' screening processes. And transactions will be conducted in more hidden and dangerous surroundings. In Ireland, following the criminalisation of the purchase of sex, reports of violent crime by sex workers to Ugly Mugs Ireland increased by 92%. The Government has set goals to halve violence against women in the next 10 years. Implementing this law will negatively impact progress towards this goal.

3. Amendment 3: Victims of commercial sexual exploitation (A3)

3.0: Amendment 3 would repeal the offence of “Loitering or soliciting for purposes of prostitution” and relevant related parts of the Street Offences Act 1959. **I strongly urge**

members to support this amendment. Criminalising soliciting or loitering for the purposes of prostitution has always criminalised the most marginalised and vulnerable sex workers who are unable to work from off street premises. It is well documented that this group experience the highest rates of physical and sexual violence; many are unwilling to report this do to the fear of being charged with loitering or soliciting. Repealing this law has the potential to address this, and resources could be better focused on the violent offenders who specifically target on-street sex workers. **I strongly urge members to support this as a stand alone amendment.** Addressing this legislation was also noted to be a matter of urgency by the Home Affairs Select Committee in 2016. This amendment has already been thoroughly considered and recommended, I therefore strongly urge members to support it.

If you would like further information or clarification regarding any of the points made, please contact me: mary.laing@york.ac.uk.