

Sex working - Prostitution

Contents

Policy statement	2
Principles.....	2
Responsibilities.....	6
All officers and staff	6
District commanders.....	11
Additional information.....	12

Policy statement

Summary

West Yorkshire Police will work with communities and various stakeholders to provide a balanced and proportionate response to the competing demands of:

- protecting sex workers from crime and supporting those who are victims as many are marginalised and vulnerable due to their circumstances;
 - addressing the needs of communities, which feel impacted by sex workers and the social consequences;
 - building relationships and rapport with/between sex workers, outreach and support networks, communities and the police in order to manage prostitution related issues and ensure their confidence in the police service is not eroded; and
 - robustly investigating offences committed against sex workers, e.g. sexual exploitation, and bringing to justice those involved, particularly organised criminal gangs and human traffickers involved in the sex industry.
-

Scope

This policy procedure applies to all police officers and police staff.

Principles

General

West Yorkshire Police will:

- Recognise that a large section of sex workers choose this type of work for personal reasons and conduct their lives in a very professional way and many never come to the attention of police either as victims or perpetrators of crime.
- Communicate clearly that the harassment, stalking, blackmailing and threats of using violence against sex workers etc. is criminal and build and maintain the trust of sex workers and support services to encourage victims to report these crimes.
- Understand that some sectors of prostitution have links with a number of social issues, e.g. domestic abuse, drug dependency, poverty, homelessness and social exclusion. The complexity of the relationships, particularly between drug use and prostitution, means that there are valid reasons for addressing this problem on as many levels as possible and minimising the potential wider impact on society of e.g. increased levels of acquisitive crime, deterioration of health, mounting pressure on local resources/services, perpetuating cycles of poverty and abuse.
- Identify a senior officer to be the strategic lead for prostitution who will co-ordinate and monitor policy and ensure police representation in strategic multi-agency forums on prostitution.
- Ensure the availability of an [Independent Sexual Violence Advisor \(ISVA\)](#) or a Sexual Assault Referral Centre (SARC) or a Rape Crisis Centre to ensure

that those involved in prostitution who have suffered a serious sexual assault can access the appropriate services.

- Ensure that ISVA services are aware of and work in partnership with their local sex work support projects and National Ugly Mugs Scheme.

Victims and communities

West Yorkshire Police will:

- Treat sex workers sensitively and ensure they are supported and protected from violence, exploitation and coercion and keep communities safe, with a clear focus on reducing threat, risk and harm and increasing public confidence.
- Protect individuals and communities from the risk, harm, exploitation and effects of the sex industry and treat sex workers as people who may become victims of crime that it has a responsibility to protect.
- Adopt a victim centred approach which considers the needs of both individuals and communities and ensure a proportionate response to community impacts, focusing enforcement on perpetrators of exploitation and those who commit crimes against sex workers, and using appropriate resources and legislation when every other avenue has failed.
- Prioritise diversionary approaches over enforcement, with sex workers referred to outreach, support, drug/alcohol services, health services, sexual violence and domestic abuse services where appropriate.
- Consider affording special measures to sex workers who are vulnerable and intimidated but wish to provide intelligence and evidence against individuals who have abused, exploited or coerced them, in accordance with the Youth Justice and Criminal Evidence Act 1999 (subject to the discretion of the Court).
- Offer support to those exiting prostitution as this process involves several stages of change over time, however, there is no requirement for a sex worker to 'exit sex work' to be involved in a sex work or exit project.
- Ensure access to support services is available on a voluntary basis and these services are in place before conditional or other linked support is offered.
- Develop and participate in schemes with support options linked to conditions or orders (e.g. engagement and support orders) in consultation with local specialist support projects and other agencies and adopt a model which does not lead to an increase in the use of legislation or further criminalise sex workers.

Support projects and partnerships

West Yorkshire Police will:

- Create, if necessary, and support effective partnerships with other agencies, organisations and individuals, which help to minimise or eliminate the harm that can be caused from prostitution to individuals and communities.
- Invite staff from sex worker projects to meet with officers and deliver briefing sessions/training about the services they offer to sex workers and

the issues sex workers face, particularly in relation to accessing police services and support when they are victims of crime.

- In partnership forums, listen to the concerns of projects, respect the remit of projects, develop partnerships within agreed boundaries and recognise the advantage of having projects that are independent of the police.
- Include relevant information, contact numbers and details of support organisations on its website.
- Ensure holistic health and social care, outreach and support services are in place for sex workers, including support for those who choose to exit the sex industry.
- Support the work of the UK Network of Sex Worker Projects (UKNSWP) and other frontline projects, particularly in relation to the National Ugly Mugs Scheme (NUMS) and local NUMS projects that feed into it.
- Encourage all services that engage with sex workers and local support projects to sign up and report incidents to NUMS in order to:
 - ensure a joined up good practice approach to the reporting of crimes by sex workers;
 - maximize the sharing of information in a model which respects the consent of sex workers; and
 - set up intelligence pathways which support those schemes linked to NUMS.
- Develop an action plan which supports policing activity and outlines the specific activities required, in consultation with our statutory, non-statutory and third sector partners by:
 - listening to sex workers in shaping our services;
 - actively engaging partner practitioners to provide a co-ordinated and comprehensive approach to delivering services for all sex workers; and
 - identifying and sharing evidence based best practice across our districts.
- Use joint working agreements to ensure it has confidence in the quality and professionalism of the partner agencies, outreach projects and others that it works with and their services as regards safeguarding, confidentiality, data protection, information sharing, professional development and training frameworks with trained staff and volunteers.
- Establish links with services offering drug and alcohol harm reduction information and advice, referral and access to drug and alcohol treatment programmes.
- Ensure early intervention with drug rehabilitation programmes and adopt a multi-agency approach to ensure sex workers are referred into a programme where they have their particular needs assessed and attend appointments.

Response

West Yorkshire Police will:

- Train officers and staff in relation to prostitution covering such topics of the vulnerabilities sex workers can experience, how sex work is structured in their areas, acknowledge differences between sectors, reasons for involvement, experiences of violence and barriers to reporting, support

needs of sex workers and particular issues for migrant sex workers and victims of trafficking.

- Scope sex work scenes using factual information, statistics and research that is gathered locally, ideally within a multi-agency context, to establish the scale of `on` and `off` street prostitution activity and community concerns and expectations.
- Conduct risk assessments and create problem profiles around victim/offender/location, in conjunction with partner agencies, to help understand the nature of sex work across the county's geographic area and participate in multi-agency strategic and operational forums formed to address prostitution.
- Promote greater in-house communication between police teams and between specialist units and sex work support projects to ensure an integrated approach which acknowledges that crackdowns and other short term approaches may deliver temporary respite but will not deliver sustainable solutions.
- Investigate crimes professionally and robustly, particularly where this will disrupt organised criminal activity involved in the sex industry, and successfully prosecute those who abuse, exploit and coerce sex workers.
- As part of its risk assessments, categorise indoor premises (brothels) as non-nuisance, nuisance or risk premises to determine the level of response required.
- Ensure prevention and harm reduction are key elements of its strategic response to prostitution where it is motivated by problematic drug and or alcohol misuse.

Human trafficking

West Yorkshire Police will:

- Use the most effective way of detecting human trafficking by maintaining communication with and building trust amongst sex workers and support agencies.
- Recognise that the intimidation of trafficked individuals is likely to inhibit them from seeking help to exit, reporting criminality or providing evidence against those who have abused and exploited them.
- Engage early with the UKHTC to obtain tactical advice, risk assessments and expertise in relation to operational planning, the gathering of high quality evidence and intelligence and advice on the management of victim needs including medical, psychological, language and social care, repatriation and security.
- Ensure operational security as, with significant risks being run by organised crime gangs and highly vulnerable witnesses, it is essential that the integrity of operations is maintained at all times.
- Consider using alternative charges where appropriate, e.g. perverting the course of justice, conspiracy, false imprisonment, etc.

Organised crime West Yorkshire Police will:

- Co-ordinate intelligence gathering to understand connections with other forms of organised crime and illegal economic activity, e.g. protection, drugs, trafficking, exploited labour in restaurants, illegal minicab hires etc.
 - Use intelligence gathering techniques to establish which premises are being used to understand what is happening and pay informal visits to reveal the true picture of activity on the premises.
 - Instigate focused financial investigations and asset seizures through the use of the Proceeds of Crime Act 2002 to create opportunities for prosecution and impact on the profits being made.
 - Link in with National Crime Agency for advice and assistance as well as sharing intelligence opportunities.
-

Responsibilities

All officers and staff

Dealing with communities

Police officers and police staff are responsible for:

- Concentrating on the community as a whole, rather than focusing on the single act of street sex working, ensuring they deal with other problems in the area such as drug dealing, anti-social behaviour and poor environmental conditions.
 - Engaging partners as well as the community, through representatives, in decision making and problem solving to increase accountability and provide communities with a feeling of strength and control. Ongoing consultation and mediation with residents, sex workers and support agencies is one important element of policing street sex work.
 - Supporting partners in establishing or maintaining holistic health and social care support services, including outreach services, drop-in centres, one to one case work, safe-houses, interventions, support re safety and violence, health, welfare, housing, drug and alcohol dependency, domestic abuse/coercion, training/education, exit support.
-

Dealing with sex workers

Police officers and police staff are responsible for:

- Treating sex workers with dignity and respect.
- Understanding that modern technology plays a part in both `on` and `off` street prostitution as sex workers use social media and other internet sites for advertising and arranging meetings. Some sex work support projects now provide netreach to contact and offer support to sex workers using internet and digital technologies.
- Gaining their trust which will increase the confidence of sex workers to report crimes against them and create intelligence gathering opportunities as regards prostitution and the community as a whole.
- Provide sex workers with information about healthcare, social care, welfare, education, housing, legal, financial, advice, safety and drug

treatment services and support necessary to address their needs and to minimise threat, risk and harm to them and supporting the providers of these services.

- Working and referring them to multi-agency partnerships so they can access fast track care pathways for support regarding drug and alcohol addiction, counsellors, housing, homeless units, hostels, mental health teams and physical health, domestic abuse and involvement with the criminal justice system. Raising awareness to these issues may reduce attrition rates in the criminal justice system.
- Creating opportunities and providing appropriate interventions to allow sex workers to leave prostitution if they choose to do so, e.g. using the steps provided in [Home Office Circular 006/2010](#) or guidance from the National Ugly Mugs Scheme and others.
- Creating a bespoke intelligence picture for each local area of active sex workers, which includes new sex workers to the area, men looking to pay for sexual services and exploiters/coercers and ensuring intelligence is used effectively by disseminating it at a local level.
- Using enforcement as a very last option, as part of a proportionate and staged approach, which includes warnings, police engagement with local support projects, voluntary engagements with projects and existing diversionary mechanisms, and only when all support and mediation options have been exhausted.

Dealing with victims

Police officers and police staff are responsible for:

- Treating all crimes against sex workers as ‘hate’ crimes, in accordance with National Policing 2014 Hate Crime Guidance. www.college.police.uk, because as a stigmatised and often vulnerable group, crimes against them are akin to hate crimes albeit they are not a hate crime group in statute. This also provides one way of building trust and ensuring quality, victim centred, well monitored investigative responses to crimes against sex workers.
- Thoroughly investigating reports of violence, sexual offences and other crimes committed against sex workers as it is highly likely that it will be a serious offence for them to report it. Under no circumstances must these be considered ‘occupational hazards.’
- Safeguarding the victim and other sex workers and ensuring special measures are considered at the earliest opportunity as well as explained to victims to support and give them confidence to pursue an allegation.
- Being mindful that the vast majority of crimes against sex workers are not reported and making use of the NUMS to:
 - Support investigations and help to engage sex workers.
 - Act as an intermediary between sex workers and the police.
 - Disseminate information widely and directly to sex workers and a range of frontline service providers in a particular area.
 - Warn sex workers about an individual known to police who may be a danger to them, i.e. someone recently released from prison.

- Send out appeals for witnesses or further victims of a particular offender.
 - Check phone numbers of offenders to see if offenders have previously been reported to NUM anywhere in the UK.
 - Check descriptions and MOs of offenders to see if other sex workers have been targeted anywhere in the UK.
 - Proactively identify offenders based on anonymous intelligence passed on by NUM. The intelligence may be passed on anonymously but NUM can always contact the victim and many eventually decide to make a formal report if police identify an offender.
 - Being aware of the nature and broad range of crimes committed against sex workers and being prepared to respond to, e.g. internet based harassment, stalking, blackmail and fraudulent scamming.
 - Taking DNA samples from all suspects when they are arrested for a recordable crime.
 - Contacting sex work outreach and support groups on their behalf which have expertise in supporting victims of crime and linking with partner agencies to provide a holistic solution.
-

Drug and alcohol issues

Police officers and police staff are responsible for:

- Adopting a sensitive and respectful approach to sex workers with drug and alcohol problems.
 - Training so they have an understanding of the health and social care needs of sex workers with drug and alcohol addiction, the pressures of relapse and that recovery can be a long process for some.
-

Sexual exploitation and coercion

Police officers and police staff are responsible for:

- Building trusting relationships with sex workers to encourage disclosure of any exploitation and coercion being experienced.
- Ensuring mechanisms are in place to ensure sex workers are aware of and signposted to the routes for reporting issues of coercion and exploitation.
- Sensitively policing 'on' and 'off' street prostitution, linking in with partner agencies to identify any changes in the intelligence picture and any concerns re exploitation, coercion and crimes against sex workers.
- Where sexual exploitation and coercion is believed to be occurring, fully enforcing the law using all legislation available.
- Conducting authorised desktop research into internet sites, newspaper advertisements, telephone directories, social media and property letting agencies, etc. to gather intelligence to assess the true extent of the problem.
- Using appropriate channels to report any information about sexually exploited or coerced adults in order to trigger a multi-agency meeting to safeguard the vulnerable adult with assistance from adult social care services.
- Intelligence debriefs of sex workers, their associates, friends and clients, etc.

- Technical surveillance under appropriate authorities.
 - Making use of source tasking through Covert Human Intelligence Sources (CHIS)
 - Making referrals to the UK Human Trafficking Centre for both external (into the country) and internal trafficking (within the country) of adults.
-

Male and transgender sex workers

Police officers and police staff are responsible for:

- Using appropriate pronouns in relation to transgender service users and making it clear that they are accepted as whatever gender they present. If in doubt, ask an individual what gender pronoun they prefer.
 - Recognising that male and transgender sex workers face severe stigmatisation and isolation in an already marginalised group and often face added social and financial pressures because of difficulties they experience finding other employment.
 - Supporting health, welfare, education and peer-led organisations in promoting safe sex practice by male and transgender sex workers.
 - Establishing links with lesbian, gay, bi-sexual, transgender (LGBT) liaison groups.
 - Applying the UKNSWP – Male and Transgender Sex Workers Good Practice Guide. www.uknswp.org
 - Consulting the National Trans Police Association for guidance <http://ntpola.com/>
-

Migrant sex workers

Police officers and police staff are responsible for:

- Recognising the particular vulnerabilities of migrant sex workers and the barriers they face in order to provide them with a premium service. (Between 2013 and 2016, 78% of sex workers killed in the UK were migrants.)
- Considering their particular needs given that sex workers are stigmatised and face discrimination in the UK and, in the case of migrant workers, this is combined with legal, cultural, language issues and racism to create a disadvantaged and excluded vulnerable group.
- Being vigilant to signs of trafficking and exploitation as, because of their immigration status and or poor experiences of the police in their home nations, they are even less likely to report crimes against them, so are seen as easy targets by criminals.
- Recognising that only a small minority of migrant sex workers (less than 10%) are trafficked and assuming otherwise is detrimental to any meaningful engagement. Where it is possible they may be a victim of trafficking, adhering to the [Modern slavery](#) policy and using the national referral mechanism (NRM).
- Using interpreters and any other services that can assist with communication and understanding.
- Working closely with sex work support projects to understand the patterns of nationality, issues faced by migrant sex workers in their area and any

particular needs they face as well as building trust with them as they face additional vulnerabilities in relation to crime targeted against them.

- Engaging with new and settled migrant community leaders at a local level to highlight and explain the differences between policing and legislation in the UK when compared to other countries, which may have different laws in relation to sex workers and sexual exploitation.
 - Applying the Good Practice Guidance Working with Migrant Sex Workers www.uknswp.org.
 - Checking all foreign nationals that are arrested with Interpol.
-

Human trafficking

Police officers and police staff are responsible for:

- Looking for signs of people being unkempt, subdued and in fear. They are likely to be without papers or a passport and may have been forced into drug use to control them.
 - Being sensitive to the possibility that migrant sex workers may be victims of trafficking and refer to the [Modern slavery](#) policy.
 - Adopting a victim centred approach and using sensitive responses which do not increase people's fears of the police and their vulnerability by further marginalising them from support services.
-

Engaging with outreach and support services

Police officers and police staff are responsible for:

- Working in partnership to support sex workers, reduce the risks and prevent crime as well as gathering and disseminating intelligence and balancing this with the needs of the community.
 - Recognising that projects focus on the health, safety and welfare of sex workers which is at odds with police use of enforcement.
 - Supporting and using the National Ugly Mugs Scheme and local NUMS that feed into it.
 - If no such services are available, identifying and working with multi agency partners to develop outreach and holistic support services for sex workers, involving statutory, health, social care and third sector specialist providers to safeguard sex workers and improve their welfare and safety.
 - Liaising with practitioners working directly with individuals involved in sex work to identify those at risk of violence, coercion and sexual exploitation.
 - Establishing investigative and intelligence-building partnerships and information exchange protocols with key partners, including UK Border Agency (UKBA), Her Majesty's Revenue and Customs (HMRC), Community Safety Partnership's, Crown Prosecution Service, Health, Education, Outreach services etc.
-

District commanders

- Responsibilities** District commanders are responsible for:
- Ensuring that officers, particularly frontline officers, have appropriate training in order for them to deliver a professional service, when dealing with people and communities involving prostitution.
 - Deploying intelligence-led visible police patrols in order to build trust with sex workers and communities and police areas for the safety of sex workers. These must be planned and implemented sensitively, in consultation with sex workers so they are aware of the purpose and don't lead to the displacement of sex work.
 - Seeking early, meaningful intervention with their local outreach services in order to develop effective partnership approaches to whatever the localised issues are and exploit the benefits of working collaboratively.
 - Considering appointing a senior officer as district lead for prostitution, especially where there are significant sex industries operating in the area.
 - Appointing police sex work liaison officers who can:
 - act as a single point of contact in relation to all crimes against sex workers;
 - identify issues of coercion, trafficking and organised crime etc. and escalate them to the relevant agency and specialist team;
 - play a key role in building trust, encouraging reporting, regularly liaising with victims and sex work projects, support investigations and advise other police staff as well as sex work projects on policing matters; and
 - receive National Ugly Mugs (NUM) intelligence bulletins and use them to inform the Force intelligence system, if appropriate.

NB This officer should not be the same person who is involved in enforcing prostitution law.
 - Considering developing specialist sex worker ISVAs in their district, ideally based in a sex work support project, and ensuring they receive accredited ISVA training and specific sex worker awareness training.
 - Ensuring police staff avoid approaching sex workers when they are engaging with outreach and support projects on outreach, outside drop-in centres or on their premises as this may prevent the individual accessing vital health and other support services. Exceptions to this would be when sex worker has given their prior consent.
 - When indoor premises are identified, working in partnership, where possible, to risk assess the premises before implementing tactical options regarding brothels and addressing anti-social behaviour. The key objectives being:
 - Ensuring the safety and welfare of any persons working in or visiting such premises
 - Disrupting and investigating any coercion, exploitation of sex workers by any individual or organised crime activity based in or linked to premises being used e.g. trafficking and slavery offences, money laundering, and drug trafficking.

- Reducing the impact on local neighbourhoods of any anti-social behaviour related to the use of premises as a brothel where there is evidence of such impact.
 - If the decision is to enforce legislation and close premises, considering the threat, harm and risk to sex workers who choose to continue to work from unfamiliar premises or areas as well as the impact on trust and the amount of intelligence submitted.
 - Not involving the media in operations as vulnerable victims may be present and publicly identifying sex workers would seriously undermine their safety.
 - Considering environmental factors and implementing solutions with partners, including designing in safety and implementing target hardening measures, clearing up debris, improved street lighting, using CCTV and ANPR etc.
-

Additional information

Compliance

This policy complies with the following legislation, policy and guidance:

Policing and Crime Act 2009

Youth Justice and Criminal Evidence Act 1999

Crime and Disorder Act 1998

[ACPO/NPIA Guidance: Investigating Child Abuse and Safeguarding Children 2009](#)

[Home Office Circular 006/2010](#)

[APP Major investigation and public protection/Prostitution and Modern slavery and Child sexual exploitation](#)

[NPCC National Policing Sex Work Guidance](#)

Related policies

[Child sexual exploitation](#)

[Domestic abuse](#)

[Modern slavery](#)

Policy database administration

Item	Details
Document title:	Sex working - Prostitution
Owner:	Corporate Services
Author / Reviewer:	John Rogerson
Date of last review:	17/10/2017
Date of next review:	17/10/2019
The Equality and Human Rights Assessment for this policy is held on Force Registry which can be accessed via this link .	
This policy has been approved by the Force Crime Registrar <input checked="" type="checkbox"/> (approval must be sought at every interim and full review) Delete this row if not necessary	

The table below details revision information relating to this document:	
Topic title	Date