

READING BETWEEN THE LINES

Examining the links between advertisements for sexual services and trafficking for sexual exploitation

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By Halliki Voolma and Melisa Trujillo

Commissioned by Mary Honeyball, MEP

The above sex adverts were all taken from London local newspapers (the South London Press, Islington Gazette and Loot) in March 2012.

A NOTE ON THE AUTHORS

Halliki Voolma and Melisa Trujillo both have a BA in Social and Political Sciences and an MPhil in Multi-disciplinary Gender Studies from the University of Cambridge. Halliki is currently a doctoral candidate at the Centre for Gender Studies at Cambridge, researching the problem of domestic violence against immigrant women, with a conceptual focus on intersectionality in law and policy and human rights for the multiply marginalised. Melisa is embarking on a Sociology PhD in October, focusing on the intersections of gendered embodiment, agency and the docile body, and in particular examining corporeal ethics of care.

ACKNOWLEDGMENTS

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EXECUTIVE SUMMARY

This report addresses the issue of advertisements for sexual services in London local newspapers, with a particular focus on the connections to human trafficking for sexual exploitation which have been emphasised by researchers, non-governmental organisations and the Metropolitan Police. Drawing on 13 stakeholder interviews, policy documents and available research, the report highlights key factors to be considered in relation to this issue and makes recommendations to newspaper publishers, the Newspaper Society and the Government. This report calls for renewed attention to the issue of sex advertising in local newspapers, which has fallen off the political agenda in the past few years.

The Metropolitan Police, in a letter sent to 170 editors of London newspapers in late 2010, made it clear that the Metropolitan Police considers there to be a strong link between sex advertising and sex trafficking, and that it is the responsibility of newspaper editors to scrutinise the ways they publish advertisements so as to not unwittingly support either sex trafficking or the exploitation of prostitution, and become criminally liable (Martin 2010).

The Newsquest Media Group made the decision to ban sex adverts from all of their titles in 2008, but beyond this only a few individual titles have changed their policy. The Metropolitan Police are increasingly engaging with individual newspapers to advise them on how best to phase out sex adverts.

Unresolved tensions

A key finding of this study was that there are several unresolved tensions in relation to the issue of sex advertising that need to be taken into account in policy-making.

One such tension concerns the divided views of stakeholders regarding the removal of sex adverts from local newspapers as a solution. While many stakeholders are unwavering in their conviction that adverts for sexual services should be banned from local newspapers because their legality is questionable and they fuel demand for sex trafficking, many sex worker support service providers see sex advertising as a logical and necessary activity for women in the sex industry to be able to make their services known so they can make a living. Also, while banning adverts from newspapers ensures editors are not complicit, it does not 'solve' the problem of sex trafficking or more general exploitation in the sex industry.

Another key tension is between revenue and ethics: while local newspapers clearly have a responsibility towards the communities they represent, they must

also ensure they have a financially viable business. Newspaper publishers are under considerable, and increasing pressure to find revenue for their titles and without the income from sex adverts, some titles would fold.

Finally, and more broadly, there is an ideological divide among stakeholders regarding the morality and ethics of prostitution and this inevitably influences views on what should be done about sex adverts.

Black and white arguments are ubiquitous in this field yet this report and the tensions it reveals points to how crucial it is to take into account opposing perspectives and develop nuanced policy approaches - no one stance has all the answers, particularly as key strands of this topic are clouded in stigma and illegality.

Available evidence on the central themes of prostitution, sex trafficking, sex advertising and their links remains limited, unclear and contested. More, comprehensive, quantitative as well as qualitative research is urgently needed for evidence-based policy and guidelines to become a reality.

Recommendations

This report makes key recommendations to London local newspaper publishers, the Newspaper Society and the Government.

Newspapers are urged to take responsibility for the social impact of their content and advertising policy. The minimum standard is for newspaper publishers/editors to have comprehensive safeguards in place to ensure they have done everything reasonably within their power to check that the sex adverts they accept are not publicising illegal establishments or activities including human trafficking for sexual exploitation. The most reliable way to ensure that local newspapers are not complicit in sex trafficking through their advertising policy is to remove adverts for sexual services from their titles completely.

The Newspaper Society is called on to take a lead in drawing renewed attention to this issue and ensuring that newspapers respond.

The Government is urged to clarify the laws around sex work and sex advertising as they are currently confusing and contradictory, in order for them to be easily interpretable by sex workers, buyers of sexual services, newspaper publishers, the police, prosecutors and the public. Focus on and direction from the Government on the issue of sex advertising is urgently needed.

INTRODUCTION

This study was commissioned by Mary Honeyball, Labour MEP for London, to explore the complex issue of sex advertising in local newspapers in relation to the off-street sex industry in London and its potential links with sex trafficking.

The impetus for this research was three-fold: first, notable political attention was paid to this issue towards the end of the last Government's term (for example, the 2008 Government Equalities Office report commissioned by Harriet Harman, MP, "Women Not for Sale: a report on advertising women in small ads in local newspapers"); attention that has since faded away. This report aims to renew the focus on this important issue.

Second, this research has been commissioned in the context of the lead-up to the 2012 Olympic Games. As a major sporting event, the Games are attracting fears of an increase in human trafficking into the UK. Although the evidence surrounding any potential increase in trafficking (and sex trafficking in particular) during major sporting events is heavily contested, with different arguments often falling along ideological fault-lines, there is growing public awareness of the problem of human trafficking, and an understanding that this is an issue that needs to be addressed at a national level. This research seeks to contribute to this discussion.

Third, and most pressingly, this study coincides with work that the Metropolitan Police Service has been conducting around the issue of sex advertising in London local newspapers, most notably with the dissemination in November 2010 of a letter asking newspaper editors to put systems in place to minimise the possibility of sex advertising in their newspapers aiding traffickers or those exploiting prostitution (Martin 2010).

It must also be noted that it is in large part due to the committed and ongoing work of local community groups, in particular that of the Croydon Community Against Trafficking (CCAT), with the police and newspapers, that attention to the issue of sex advertising and its potential links with sex trafficking has been maintained.

The evidence base of research on this issue is complex, contested and incomplete, both due to the politically and socially challenging nature of the issues at stake; and to the practical and methodological difficulties inherent in researching criminalised and often stigmatised areas of social life, such as the sex industry and human trafficking.

However, these are issues that need to continue being investigated, both despite of and because of these challenges.

Sex advertising

The advertisements referred to in this study as 'sex adverts' are those advertising massage parlours, saunas and escort agencies that may also be reasonably inferred to involve the selling of sexual services other than those advertised, and which are often covers for brothels (which are illegal). According to the Metropolitan Police, certain non-English-speaking newspapers, for example in the Lithuanian and Chinese communities, openly advertise brothels, although these are more difficult to investigate because of the language barrier. This study is not concerned with adverts for sex chat lines, which are a separate phenomenon.

These adverts are widely accepted to be a leading source of information on sex establishments for potential and actual buyers of sexual services. In a recent study on men who buy sex in East London, for example, "Respondents were asked to identify a maximum of two most common ways they made contact. Interestingly, local newspapers are by far the most sourced, which suggests a strong correlation with familiar locales. Advertising features in four of the top five categories, supporting the view that sex markets are created and expanded through such processes" (Coy et al. 2007: 13).

According to the Newspaper Society (NS), 33 million people a week read the 1,100 local and regional newspapers published in the UK (NS 2012b). Local newspapers are the most popular form of print media, and considered by many as a valuable and responsible source of information for their communities. It is reasonable in this context to ask whether local newspapers are acting as responsibly as they could be with regards to publishing these adverts.

The sex industry in London and trafficked women

Research on the sex industry has until recently been almost solely focused on the women who sell sex. It is only in the last few years that research has begun to examine the men who buy sex, how and why they do so, and with what impacts, both on themselves and the women from whom they buy sex. This is a very important development that al-

lows research now and in the future to consider the sex industry in a more holistic light, and is vital to any attempts to tackle sex trafficking within the UK. Both the routes and experiences of women into and out of prostitution, and the demand for their services, must be examined carefully where the intersection of complicated gender dynamics, multiple vulnerabilities, and complex laws render this issue opaque.

921 London brothels were identified in the POPPY Project's 2008 Big Brothel report, although this is

"In 2000, one in 29 men admitted buying sex [in the UK], rising to one in 11 in London where the largest sex markets are concentrated" (Coy et al. 2007: 2; Ward et al. 2005)

estimated to be only "the tip of the iceberg". This report also estimated that sex advertisements in London newspapers generates between £86-209.5 million per year, many of them posing as massage parlours and saunas (Bindel and Atkins 2008). Both this report and POPPY's 2004 Sex in the City report, as well as other major pieces of research, showed that a minority of sex workers in London's off-street sex industry are British, with large numbers of Eastern European and South East Asian migrants working in the off-street sector (Dickson 2004).

The Association of Chief Police Officers' (ACPO) Project Acumen report Setting the Record (2010)

"Considerable sums of money are being made from prostitution. A two bedroom brothel with a number of girls working in it can very easily turn over £20 000 a week. We know of brothels at the top end of that market that are turning over £20k in weekend. That gives you an idea of the sort of volume of money and what would attract organised criminality."

Detective Chief Inspector Nick Sumner, Human Exploitation and Organised Crime Command (SCD9)

estimates that there are 30,000 women working in the off-street sex industry in England of Wales, with roughly 17,000 of them migrants. In London, the number of migrants working in the off-street sex industry was found to be 96.4%. Of the 17,000 migrant sex workers estimated to be working in the UK, Acumen estimated that 2,600 are trafficked, while another 9,600 are considered to be vulnerable. "The majority of women in this category are

from Eastern Europe (4,100), followed by those from China and South East Asia (3,700). The remaining women are from South America and Africa" (Jackson et al. 2010: 5-6). However, as with any attempt to quantify covert activity, these estimates must remain as such.

The sex advertising // sex industry // sex trafficking matrix: vital statistics

- Between 1 April 2009 and 30 June 2011 there were **1664 referrals to the National Referral Mechanism**, the national framework for the identification of victims of human trafficking in the UK. The overwhelming majority (**72%**) were women. The numbers of individuals trafficked into and within the UK is likely to be much higher than this figure (Serious Organised Crime Agency, 2012a).

- Project Acumen estimates that **the off-street sex industry in England and Wales consists of 6,000 businesses and 30,000 women** (of these, they estimate 17,000 are migrants) (Jackson et al. 2010)

- Of these 17,000 women they estimate **2,600 are trafficked**, 9,600 are considered to be vulnerable, and 5,500 are neither trafficked or vulnerable (i.e. they knew they were probably coming to the UK to be involved in sex work and did so with relatively few barriers to their personal and economic autonomy. Of these, 85% are from Eastern Europe) (Jackson et al. 2010)

- **96.4% of sex workers in London are migrants** (Jackson et al. 2010)

- The Big Brothel report identified **1500 brothels in London** using only London newspaper advertisements; in addition, Project Acumen also used newspaper advertisements to identify brothels across England and Wales (Bindel and Atkins 2008; Jackson et al. 2010)

- Organisations such as the POPPY Project and the Metropolitan Police, who identify and support trafficking victims observe that although **a high number of trafficking victims referred to them are young women of (West) African origin**, they are significantly under-represented in the accessible off-street sex industry, suggesting that these women are trafficked into closed markets (Jackson et al. 2010; Metropolitan Police, interviewed for this study; Georgina Perry, Manager of Open Doors, interviewed for this study)

- It is estimated that local newspapers accrue a total of **£44 million in revenue** from sex advertising annually (Government Equalities Office 2008)

THE STATE OF AFFAIRS

ONE YEAR ON FROM THE METROPOLITAN POLICE LETTER CALLING FOR URGENT ACTION ON THE ISSUE

On 25 November 2010 Richard Martin, Detective Chief Superintendent, OCU Commander of SCD9 Human Trafficking and Exploitation, sent a letter to over 170 editors of London newspapers (Martin 2010; Whalley 2010b). In this letter he made it clear that the Metropolitan Police considers there to be a strong link between sex advertising and sex trafficking, and that it is the responsibility of newspaper editors to scrutinise the ways they publish advertisements so as to not unwittingly support either sex trafficking or the exploitation of prostitution.

Although the 'Women Not For Sale' report commissioned by Harriet Harman granted this issue important political impetus, the Met's letter gave the matter of the link between sex advertising and sex trafficking new urgency (GEO 2008; Newspaper Society 2007). In the fifteen months since this letter was published, there have been some notable changes in the ways local newspapers in London advertise for these services, if they still do so at all.

In order to evaluate the 'state of affairs' in terms of sex advertising in local London newspapers, key evidence has to be examined, alongside changes in policing by the Metropolitan Police, the responses of the newspapers to the Met letter, and a deeper understanding of the forces that influence newspapers.

Evidence for the link between sex advertising and sex trafficking

Exploring the link between sex advertising in newspapers and trafficking for the purposes of sexual exploitation is not a new endeavour. As we have seen, from Harriet Harman's interventions in 2008 and the Home Affairs Committee report's intervention (see below quote), to Project Acumen's methodologically rigorous 2010 report, and DCS Richard Martin's November 2010 letter, numerous efforts have been made over the last few years to forge an in-road into this question.

"Whilst it is not possible, based on their content, to identify whether any of these ads are advertising trafficked women, information from additional research and other sources would suggest that this is a distinct possibility."
(Geo 2008: 4)

Extract from DCS Richard Martin's 25 November 2010 letter:

"It is clear from a considerable numbers of ... operations that advertising in newspapers can play a key role in facilitating the exploitation of trafficked victims. The adverts in question often purport to be massage parlours, saunas or escort agencies, but are in reality a front for criminal networks to advertise trafficked victims for sexual services. Consequently it is vital that we tackle this area as part of our overarching strategy to reduce trafficking in London.

"I am therefore seeking your support to help us address this issue by ensuring that your publications do not allow advertising space to be utilised to promote these practices. Advertisements that offer multi-national or young women; or which are sexually suggestive in tone are often the type found to be linked to the provision of sexual services and / or the presence of trafficked women. It is these types of adverts I am seeking your support in preventing. I would ask that you put in place a system to satisfy yourselves that those seeking to place advertisements are genuine concerns or businesses and not a cover for the types of criminal activity highlighted above.

"As you will appreciate, criminal liability can arise in certain circumstances where evidence clearly shows that the advertising in question supports or promotes offences associated to trafficking, exploitation or proceeds of crime."

The stakeholders interviewed for this study were divided as to the existence and nature of the link between this type of advertising, and sex trafficking. To some, particularly sex worker service provider organisations, sex advertising is a logical and reasonable form of advertising for women in the sex industry who need to make their services known in order to make a living. In this perspective, sex advertising has no significant links with sex trafficking, especially not a causal one. These stakeholders criticised the way this link has been established by other organisations on methodological grounds: phoning numbers advertised in

newspapers and pretending to be potential customers to find out what is offered is not a reliable methodology because there is no guarantee that the person taking phone calls will provide reliable information about the number and nationality of girls present (see Geo 2008).

“There are links in terms of maintaining the demand level for prostitution”

Pam Bowen, Chief Policy Adviser, Strategy and Policy Directorate, Senior Policy Adviser at the Strategy and Policy Directorate, Crown Prosecution Service (CPS)

“I don’t believe [sex advertising] makes [trafficking] worse, or makes it better. But what I do know is it [the fear of trafficking] makes it difficult for any woman to advertise and a lot of the papers aren’t refusing the adverts, but they’ve upped the price 300% to take an advert. So, who’s winning here? Because there’s no law about newspaper adverts.”

Michelle Farley, Services Manager, Sexual Health on Call (SHOC)

“While the description of nationalities gives some indication of women’s origins, research suggests that, for various reasons, these descriptions may not always be accurate. Indeed, postings on a website for men using prostitutes make many references to women, or those advertising their services, giving false information regarding nationality and not admitting when women are from Eastern European countries or from Thailand – two areas well known for trafficking women. Albanian women receiving aid from the Poppy Project had been advertised as Italian, Greek and Latin American by their traffickers.”

(Geo 2008: 8)

However, stakeholders such as the Metropolitan Police and CCAT argued that this method is effective in terms of identifying brothels, whether or not the additional details given over the phone are accurate. Both stakeholders spoke about a strong link between sex advertising and trafficking for the purposes of sexual exploitation, based on their investigations identifying trafficked women through sex adverts.

A further argument is that advertising for sexual services serves to fuel demand for prostitution, and in areas, such as Southwark, where sex ad-

The **House of Commons, Home Affairs Committee, Sixth Report, “The Trade in Human Beings: Human Trafficking in the UK”** (2009) noted, in its section on reducing demand for sex trafficking, that “We were concerned that the growth in the number of ‘adult entertainment’ establishments, such as lap dancing clubs, and the ease with which these businesses advertised themselves (particularly in local newspapers) were fuelling demand for sex workers and therefore indirectly for sex trafficking. The Poppy Project was of this view, noting that newspaper adverts often referred to women of particular ethnic origins being ‘newly arrived’. Chief Constable Maxwell, speaking on behalf of both the UKHTC and ACPO, also thought adverts for personal services encouraged trafficking. He suggested that editors should come to an agreement not to accept such adverts.”

vertising is strictly prohibited, there are lower observable levels of prostitution (Dickson 2004; Coy et al. 2007). It could be, of course, that prohibiting sex advertising, rather than reducing demand for sex work, merely reduces access, but this is nevertheless an important argument. Other studies argue that the “sexualisation” of culture (and the commoditisation of sex) in the West is an important factor in increasing demand for prostitution, and for trafficked women into the sex industry, and so easy access to brothels through advertisements in the back of newspapers can only serve to fuel this demand (Bindel and Atkins 2008).

Based on an absolute minimum of 1933 women working solely in brothels which advertise through local London newspapers, an estimated £86 million is generated for brothels through this medium alone.

(Bindel and Atkins 2008: 25)

Reports:

Project Acumen (Jackson et al. 2010) uses the method of identifying brothels through phoning numbers advertised in newspapers as a core part of its research methodology. Because Project Acumen’s primary aim was to identify trafficked women in brothels using this method (they estimated that 2,600 women have been trafficked into the UK), it is guaranteed that there are trafficked women being advertised in newspapers.

The POPPY Project ‘Sex in the City’ report found

evidence of organised crime through “[a] connection between 88 different flats, parlours and saunas across the United Kingdom... via linked telephone numbers. Many trafficked women housed and supported by the POPPY Project worked in a number of these establishments” (Dickson 2004: 11). Although this does not prove the existence of a direct link between sex adverts in local newspapers and these trafficked women, this report also used local newspaper adverts to find brothels – therefore it is a fair assumption that at least some of these “linked” brothels¹ were identified through cross-referencing phone numbers found in local newspaper adverts.

The aim of the “It’s just like going to the supermarket” report (Coy et al. 2007) was to find men who bought sex on-street, but most of their respondents actually reported buying sex off-street (sometimes as well as on-street). The report notes that the most popular way for men to find brothels is through ads in local newspapers (Coy et al. 2007: 13). This raises the strong possibility that newspaper adverts are a powerful tool in increasing or reducing demand for prostitution, affecting the size of sex markets, and therefore the demand for trafficking for the purposes of sexual exploitation.

¹ ‘Linked telephone numbers’ refers to a connection by telephone number identified between 88 of the establishments contacted whereby the emerging pattern was around a prefix of eight numbers and was particularly concentrated in two ranges, pre-fix 290-400 and pre-fix 770-810. OfTel Consumer Helpline informed the POPPY researchers that numbers are allocated to phone operators in blocks and so groups of related numbers are likely to belong to the same company (Dickson 2004).

“Today, prostitution has moved indoors; 96% of [the] men [interviewed in this study] used women in indoor prostitution (brothels, flats, saunas, massage parlours). Based on these 103 London men’s reports of coercive control, pimping and trafficking, it can no longer be assumed that indoor prostitution is safer than street prostitution. On the contrary, it appears that many of the most vulnerable women are kept under control indoors, not in the street where they would be seen by the public or by police. Local and national newspapers cannot justify selling advertising space to brothel owners and organisers of indoor prostitution. A blanket ban on advertising of this nature should be introduced”
(Farley et al. 2009: 25)

“Also the accessibility [of sex advertising] makes it appealing ... They pick up a local paper and it’s there, or a card. They’re not going to log on at work, they’re not going to log on at home, so it just produces demand really”

Detective Inspector Kevin Hyland, Metropolitan Police Trafficking and Prostitution Unit, Human Exploitation and Organised Crime Command (SCD9)

Operation Pentameter (2006) and Pentameter 2 (2007)

Operation Pentameter was conceived as a national, coordinated effort to tackle human trafficking in the UK. Operation Pentameter involved all 55 police forces and was the largest coordinated police effort in UK history. It was focused on implementing the UK Action Plan on Tackling Human Trafficking, both identifying and recovering victims of trafficking for the purposes of sexual exploitation, and raising awareness about the issue of sex trafficking, including communicating with men who buy sex.

OPERATION PENTAMETER

84 women and teen girls freed
232 people arrested (134 charged with various offences)
515 premises visited
Women sold for £500-£8,000

PENTAMETER 2

167 victims identified
528 criminals arrested
822 premises visited
More than £500,000 in cash recovered (initially) from those arrested

(Lipscombe 2012: 18-19; Avenell 2008).

CCAT case study:

“Some of the things CCAT were able to show me I just couldn’t believe. Some of the case studies of the people that they’d managed to rescue, the numbers of people that they’d been forced to sleep with in a particular given night, the way they were being transported around and their treatment and children of 11, 12, 13 who’d been abused in certain ways by large numbers of people, it just was horrendous stuff”

Andrew Parkes, Group Editor South London, Newsquest

Croydon Community Against Trafficking (CCAT) was established in 2004 as a response by local residents to the POPPY Project research report *Sex in the City: Mapping Commercial Sex Across London*, which detailed the scale of prostitution and exploitation across London and links to the issue of sex trafficking. This report showed that Croydon was ranked third highest in terms of the number of brothels situated in London boroughs, a finding which inspired Peter Cox, the chair of CCAT, among others, to work together to stop human trafficking for sexual exploitation within Croydon. As well as raising awareness of the problem of sex trafficking and trying to influence policy locally and nationally, CCAT also runs an intelligence gathering team who phone up establishments advertised in local newspapers and pretend to be potential customers, asking questions about what sorts of services are on offer. They collect this information, put it into a database and submit it to their local police about once a quarter. Meetings with the police are then organised to go through the findings, which the police can then take further action on. CCAT’s working model, which is community-based and relies on a good relationship with the police has been so successful that CCAT are now advising other groups who want to set up similar organisations in their communities. Peter Cox explained his motivation to help others replicate the CCAT model:

“I am regularly being asked to talk to other groups about how do you set up, what do we do next... What we are doing now is, because trafficking knows no boundaries, if I sort it out in Croydon, if I manage to or improve the situa-

tion, does that mean that traffickers will just go somewhere else? They are experts at moving people around. So what we are doing now is developing something else which is what we call a YCAHT – Your Community Against Human Trafficking – based upon what was learnt in Croydon. So that’s my next step, to provide this so that other communities can learn from all we’ve done, our mistakes, our achievements and move forward quickly, wherever they may be, so they don’t have to reinvent the wheel.”

Key changes in policing by the Metropolitan Police

“People are less inclined to report attacks against them now, to the police. They report them to us, but they’re not always happy to report to the police... In fact there’s a court case coming up... The woman reported [a guy], but I know they didn’t prosecute him in the end, and he was quite volatile, and she had been a victim previous to that when she worked on her own, so she chose to work with other people [in a flat]. But she wasn’t making anything from them, they were a co-op really, they shared the expenses between themselves, and she herself has got a brain tumour... anyway they actually are taking her to court... I’ve just spoken to the solicitor, and I’ve provided him with the Ugly Mugs¹ for six months before and six months after to show what a dangerous business the industry can be, and why you do need to work together if you can.”

Michelle Farley, Services Manager, SHOC

¹ The Ugly Mugs scheme is a Government-funded third party reporting scheme for sex workers to report sexual abuse and violence they encounter while working, in order to raise awareness amongst the sex work community of particularly dangerous individuals (Ozimek 2010). See <http://www.safe.wmids.nhs.uk/ugly.asp> for an example of an Ugly Mugs scheme.

Several stakeholders in our study, including the Metropolitan Police themselves, noted a significant change in the way the Met has policed the sex industry since 2009 and the entry of the Policing and Crime Act (and coinciding with the UK’s ratification of the Convention on Action Against Trafficking). Although brothels have always been illegal, there has been significantly more emphasis on shutting down brothels since 2009, leading to the displacement and increasing vulnerability of sex workers. Service providers for sex workers have told us that

before 2009 there existed a state of mutual trust, an uneasy truce between law enforcement and the off-street sex industry in London that served to protect the women working in brothels as much as was possible. The changes since 2009, which are broadly attributed to an increasing concern for women trafficked into the UK for the purposes of sexual exploitation, have, according to them, served to undermine the safety and access to services of many more non-trafficked sex workers.

The Metropolitan Police, however, staunchly defend their endeavours over the last few years to remove as many trafficking victims from brothels as possible, and prevent the trafficking of further women for the purposes of sexual exploitation into the UK.

“You have to accept that there are women out there who are working in prostitution of their own choice that are not being exploited by a third party. We come across women who even pay tax on their earnings from prostitution. So there is a legitimate element to it and we must remember that prostitution can be legal. It is the environment in which it is conducted and the activity around it, the management and the control of brothels that is criminalized, it is not the prostitute...”

“The one element that we all agree on, across all sectors, is that the one group we want to protect are the prostitutes because they are an incredibly vulnerable group. At best, I would argue, they have limited options in life and at worst, are trafficked and controlled and truly exploited within that environment. From the policing perspective, the law is the law and we are there to enforce the law, not to make moral judgments one way or the other. We want to protect the women, we genuinely do, and we are victim-focused in all of our work. However, it is very difficult to do any enforcement work in this arena without upsetting somebody or impacting upon the women themselves, the sex workers. The simple existence of brothels is enabling the exploitation of women, human trafficking and organised criminality.”

**Detective Chief Inspector Nick Sumner,
Human Exploitation and Organised Crime
Command (SCD9)**

The responses of newspapers to the Met letter

Even before DCS Martin's letter to editors, the issue of whether newspapers should allow sex advertising or not was already being considered by various newspapers.

In Ipswich, the Ipswich Evening Star and East Anglia Daily News (owned by Archant) decided to ban sex adverts in September 2011 after a campaign led by Neil Boast, a former police sergeant, as well as numerous community and church groups. After the murders of five sex workers in Ipswich in 2008 there had been increased attention to the status and welfare of sex workers, which coincided with a number of investigations that linked brothels in which trafficked women were held and advertisements for these brothels in local newspapers (e.g. the “Chinese Chicken Houses” model, which has been recognised by UN.GIFT) (Aronowitz et al. 2010). The ‘Somebody's Daughter’ campaign, part of the Somebody's Daughter Memorial Fund, a charity appeal partly funded by the Ipswich Borough Council, aimed at changing the lives of young women involved in drug dependency and prostitution, was supported by the Evening Star and the East Anglia Daily News. Those involved in the campaign to ban sex adverts in these two newspapers criticised the hypocrisy of decrying the plight of sex workers on the front page, while publishing adverts for brothels in the back pages. In addition, they noted that when in dialogue with the public, individuals would often remark that, if indeed these adverts were supporting the exploitation of prostitution, and also potentially sex trafficking, then surely it was irresponsible of newspapers to keep publishing these adverts, and newspapers should not be sending out the message that this situation is all right by them. Although both these newspapers are owned by Archant, the publisher has since stated that banning sex adverts in these two titles was a local decision that does not reflect a move by Archant to ban sex adverts in all its newspapers (Pugh 2011; Warwick 2011).

Most of the newspapers who have removed these adverts or are considering doing so have been influenced either by community-led campaigns, such as the Ipswich papers and Newsquest (see the case study below), or have been in consultation with the Metropolitan Police to assess the situation.

The reality for most newspapers is that sex advertising is a substantial source of revenue without which they would struggle, if not fold. The Met has stated that it is eager to work with newspapers,

rather than in opposition to them, to help them transition out of publishing sex adverts.

In recent months, the publisher Northcliffe Media Ltd has been in consultation with the Met regarding banning these adverts from all their titles. For the moment, only one of Northcliffe's titles, the Croydon Advertiser, has made the decision to ban sex adverts.

Newsquest case study:

Newsquest is one of the UK's largest regional newspaper publishers with more than 200 newspapers, magazines and trade publications, including 17 paid-for dailies. It has a weekly readership of 13 million and a weekly circulation of 10 million (Newsquest Media Group 2012).

In July 2008, Newsquest took the decision to ban sex advertisements from all of its titles, both in print and online. This decision was made by the Chairman and Chief Executive Officer of Newsquest, Paul Davidson. According to Andrew Parkes, Group Editor of Newsquest's South London newspapers, the decision was taken due to increasing concerns regarding the links between sex advertising and human trafficking for sexual exploitation. This move by Newsquest was welcomed by campaign groups such as CCAT and received

a considerable amount of media coverage at the time. It was CCAT's work in Croydon, which first alerted Newsquest to the issue and they have collaborated ever since.

Newsquest's policy regarding sex advertisements does not reflect an anti-sex industry approach more generally. Andrew Parkes explained that, "We're not campaigning against the sex industry as a whole... We may have our own views about the wrongs and the rights, but this is not what this was about, it was about anything linked to human trafficking."

While Newsquest has long banned sex adverts from its titles, the attempts to get these adverts into Newsquest's titles have not stopped. As Andrew Parkes pointed out, "Every week people try to get these adverts in. Even if they're banned we still get them through different routes."

"You've got to bear in mind that the people taking these ads pay in cash, they queue up to do that, I used to watch as a guy, great big extended limo, he would come along with all of his girls, they would come in with cash, pay for their adverts in cash and he would count them back into the extended Merc. And that used to happen week in, week out."

Andrew Parkes, Group Editor Newsquest South London

RESPONSIBILITY

A key question regarding the issue of sex advertising in local newspapers concerns responsibility: if we accept that sex advertising in local newspapers is at least somewhat problematic, we must reflect on whose responsibility it is to assess, and respond to, the social impact of local newspaper content and advertising policy. The stakeholders interviewed assigned this responsibility to publishers of local newspapers, the Newspaper Society, the Government, and communities as a whole.

“I think if you spoke to any journalist who works on the ground, who works with members of the community, who has those contacts, and ask them how they felt about their newspaper advertising brothels, I think you’d find that they are disgusted by it, that there is this weird hypocrisy about it, and I think that’s shown in the Croydon Advertiser when, in 2010 the paper exposed a brothel on their front page which they had actually been advertising in the back of their paper for some time.”

Kirsty Whalley, freelance journalist

‘Brothel exposed’ scandal

In August 2010, the Croydon Advertiser’s front cover presented the findings of “an undercover investigation” that revealed the existence of “a seedy brothel” in the Croydon area. However, page 52 of the newspaper carried an advert for the very same “fantasy massage” establishment that the investigation is said to have “revealed”. This was reported in the national press, as well as other local newspapers (e.g. The Guardian and the Croydon Guardian), and led to Northcliffe Media South East’s editorial director, Alan Geere, to release a statement defending the Croydon Advertiser’s “adult advertising” policy (Greenslade 2010a and 2010b; Whalley 2010a).

Publishers’ responsibility

The responsibility of the editors and publishers of local newspapers can be seen as two-fold: responsibility to the community they serve and to the journalists who write for them. Kirsty Whalley, a freelance journalist who has reported for local newspapers, including the Croydon Guardian and the Evening Standard, said that, “local newspa-

pers have a duty to their communities because you are basically the eyes and ears of the public in the courts, the council meetings and the police meetings.”

Peter Cox, Chair of CCAT, also talked about the heads of the media corporations that own newspapers as having responsibility for the social impact of sex adverts and expressed worry that, “people at the top of organisations, big empires like some of these are, don’t look at the actual detail, they just want to see the numbers come in, they want to see the revenue come in.” The revenue versus social responsibility debate was a recurring theme throughout the stakeholder interviews.

The Newspaper Society’s responsibility

As the “voice of Britain’s regional and local media”, existing to “promote newspapers’ interests in all political, legal and regulatory matters”, the Newspaper Society has a responsibility to renew attention to and ensure action on the issue of sex advertising in local newspapers (Newspaper Society 2012a). Stakeholders emphasised the NS’ responsibility to ensure their human trafficking guidelines are taken on board by all publishers. Implementation and enforcement must follow on from rhetoric. This rhetoric should include a stronger stance on the issue from the NS.

If, as the NS suggests, it is true that 70% of people act on the advertising they see in local media, the NS has a responsibility to assess the implications of this with regard to sex advertising – do we want 70% of people to be potentially acting on adverts for sexual services (NS 2011)? In spite of the difficult to resolve ideological divisions with regard to the ethics of prostitution, the Newspaper Society has a responsibility to engage with this discussion in conjunction with the Government and a variety of stakeholders such as police forces and community groups. The NS met with Government representatives (including Harriet Harman) in 2008, but this dialogue needs to be opened up once more as the issue has not been solved.

Furthermore, while currently the guidelines are a ‘members only’ resource, considering the relevance of the issue of sex advertising and its links with sex trafficking to community members, the NS has a responsibility to make this guidance document accessible and open to public scrutiny.

The Government's responsibility

Interviewees also talked about Government responsibility to at the very least assess the legality and acceptability of sex adverts in local newspapers and communicate a clear stance on the issue. In Julie Bindel's words, "It's obviously up to the politicians and lawmakers to look at whether or not it's acceptable - legally and otherwise - to place these adverts". This discussion regarding the Government's responsibility to address the impact of sex adverts ultimately leads back to arguments about the law's lack of clarity as regards prostitution in general, where what is legal and what is illegal is unclear to the majority of the public.

Social responsibility

Another level of responsibility discussed concerned society as a whole. The idea is that individuals should take an interest in and responsibility for their communities as concerned and civic-minded citizens. This includes complaining to the relevant authorities if they do not agree with something that happens in their community, including in their local newspapers, and raising awareness of issues they would like to see addressed.

"It's up to the general public to complain, we have a responsibility. If we saw that there were...16-year-olds who were being advertised as servants to work cleaning chimneys in rich people's houses, nothing illegal, I think that there would be lots of complaints. If there were adverts for dogs to somehow work in homes and live outside, we would complain about the conditions. We seem to not think it's our duty and responsibility to complain when it's just women that are not seen and not heard, so it's newspaper editors ultimately [who are responsible], as is the general public."

Julie Bindel, feminist activist and journalist

"The stance that our organisation takes is that there are all these organised criminal networks, and we need to set up organised networks of aware individuals and communities to mirror those. And so we feel that if you can only raise awareness, and if you can only speak to people that matter or the people who go about their daily business and just make them think, you know what, if you see this, and this, and this, and this, just keep an eye on it because you never know, that might be a sign that someone has been trafficked ... Just make sure that people are more aware of it and it's higher up the political agenda, the political and personal agenda"

Caroline Escott, Chairman of Active Communities against Trafficking (ACT) London Forum

IS BANNING THE SOLUTION?

ARGUMENTS FOR AND AGAINST MAKING SEX ADVERTS ILLEGAL

FOR

This type of advertising has been made explicitly illegal in Ireland. The law in the UK surrounding prostitution is confusing at best. Although prostitution is legal, many activities surrounding it are illegal, often on the basis of harm to the community (many brothels are shut down based on evidence of anti-social behaviour reported by neighbours) or exploitation of prostitution. It is not always clear what is or is not illegal, or why. With regards to advertising, although carding is illegal, adverts in newspapers are not. Ireland has taken a decisive stand against the publication of these adverts based on a strong link to the offence of exploitation of prostitution, which is just as strong in the UK. Why then has the UK not moved in the same direction?

“A person who publishes or causes to be published or distributes or causes to be distributed an advertisement which advertises a brothel or the services of a prostitute in the State or any premises or service in the State in terms, circumstances or manner which gives rise to the reasonable inference that the premises is a brothel or that the service is one of prostitution shall be guilty of an offence”

Criminal Justice (Public Order) Act of 1994, Republic of Ireland

“No government has actually been clear on what their political policy is on prostitution... There is a lack of clarity for police and prosecutors who implement the law, not make it. There is also a lack of clarity for the public in this country, many of whom don't know what is and what isn't legal, and then if you consider that, if people who live here don't know what it is, people visiting or migrants coming into the country, are highly unlikely to know what it is.”

Pam Bowen, Chief Policy Adviser, Strategy and Policy Directorate, Crown Prosecution Service

The murky legality of sex adverts. There are strong grounds to challenge the legality of publishing these adverts where there are reasonable grounds to believe that such an advert placed in a newspaper may be for a brothel, whether or

not it openly advertises as such. This is so both on grounds of exploitation of prostitution, which is illegal, and of the increased potential for newspapers and publishers to become involved in money laundering where the brothels advertising are run by organised crime networks (see the Proceeds of Crime Act 2002). We must pose the question of how likely it is that an individual sex worker operates completely independently and advertises her own services solely for her own gain.

“[L]egality contributes to normalisation, which in turn increases the likelihood of paying for sex”

(Coy et al. 2007: 25)

The normative effects of legislative change.

Research on men who buy sex and how and why they do so highlights how the socio-cultural and legal framework of a country affects the behaviours of these men. Where prostitution is entirely legalised (for instance in Australia, Germany or the Netherlands) British men buying sex felt safer and less stigmatised than when buying sex in the UK, where curb-crawling and brothels (but not the act of buying or selling sex itself) are illegal (Coy et al. 2007). Many of the stakeholders spoke about the normative effect of advertising in local newspapers in terms of the idea that “If it appears in the local paper, it must be ok” and furthermore that if it is advertised in the local paper it must be legal. This suggests that removing sex advertisements would lessen the social permissibility of buying sex from a coerced and/or trafficked woman.

Regulation of the marketing of sexual services has the potential to limit, and possibly even shrink, local sex markets, and therefore the demand for the trafficking of individuals into the UK

“The high number of respondents who accessed commercial sex premises through advertisements (n=84), especially in local papers, suggests action could be considered here. It has been argued that the policy in Southwark to not accept advertising for sexual services contributed to a low figure of identified commercial sex premises in the borough (Dickson, 2004). Regulation of the marketing of sexual services has potential to limit, and possibly even shrink, local sex markets.”

(Coy et al. 2007)

for the purposes of sexual exploitation. Research indicates that the high numbers of men who access the off-street sex industry through advertisements in local newspapers is indicative of a correlation between easy access to commercial sexual services and demand – in other words, if sex advertising in local newspapers was curbed or stopped altogether, it is reasonable to suppose that this would have an effect on demand for off-street prostitution.

Local newspapers are the most family-oriented form of media. It is a legitimate question to ask whether this is an appropriate place for sex adverts.

Potential attractiveness of “sex ad-free” newspapers to advertisers. It has been suggested that where a newspaper removes advertising for sexual services, it can attract a different kind of advertiser that wishes to publicise in a “clean” environment. Although this is an interesting idea as a way to recoup newspapers’ lost advertising revenue, when asked, Andrew Parkes of Newsquest said that while this may be the case, it is difficult to prove.

The Police will evolve new ways to detect brothels and identify trafficked women if sex adverts are banned from newspapers. Many stakeholders argued against the idea that banning sex adverts from newspapers would drive the sex industry underground, suggesting that “The brothel market is forever changing and we know it’s demand-driven. So whilst the demand is still there, we will have to morph with it.” (Detective Chief Inspector Nick Sumner, Human Exploitation and Organised Crime Command (SCD9). Another major argument in this respect is that potential customers need to be able to find brothels, and therefore the industry cannot go too far “underground”. Also, as Project Acumen reported, only a small number of brothels operate within closed markets, where profits are harder to obtain – the majority must advertise to survive (Jackson et al. 2010).

“What is underground? And if they evolve ways to advertise, then reporters and the police will evolve ways to track them. And I think this is interestingly one of the arguments that local newspapers use. ‘Oh, we publish the adverts but then the police can use those adverts to gather intelligence, so it’s a good thing that we publish these adverts.’ It’s kind of a twisted logic I suppose.”

Kirsty Whalley, freelance journalist

AGAINST

Removing sex adverts from newspapers would drive the industry underground. Law enforcement and the identification of illegal sex work activities and establishments as well as providing support services to sex workers would thus be made more difficult.

“[Banning advertising] means the police and the NHS have to put in extra resources to find people. Now the problem for the police and NHS is that the client only wants to find one person, the NHS want to find hundreds of people to offer them support so that have to put in hundreds of hours. It can be a substantial staff time demand. Especially if one of those people doing the searching is a nurse who could be offering direct clinical services... It makes giving services to people who sell sex more difficult, including services around exiting.”

Catherine Stephens, sex worker and activist with the International Union of Sex Workers (IUSW)

Banning sex adverts would make sex workers more vulnerable and stigmatised. If service providers and the Police cannot make contact with women working in the off-street prostitution sector because the adverts through which they had previously made contact are no longer available, this will be to the detriment of sex workers, who will find themselves more vulnerable and with less access to an income, support services, and increasingly stigmatised and marginalised.

“One of the things that facilitates violence against women is the social attitudes of contempt. One of the things that actually permits people to take violent action against us is that we are seen as ‘other’... Restricting advertising does nothing to tackle problems, all it does is make it less visible, it makes it more difficult to earn money which doesn’t help us at all”

Catherine Stephens, sex worker and activist with the International Union of Sex Workers (IUSW)

Changes in legislation and policing systematically focusing on trafficked women at the cost of disadvantaging non-trafficked sex workers, who face their own vulnerabilities. The international and Europe-wide focus on stopping human

trafficking (and the over-representation of sex trafficking within this broad movement) may mean that resources and support is taken away from other sex workers with distinct vulnerabilities and needs.

Removing sex adverts may make some local newspapers fold. The benefits of removing these adverts must be weighed up against the detrimental effect to local communities were they to lose local newspapers, which provide valuable services and information. This does not remove the newspapers' responsibility to ensure the adverts they publish are not promoting or supporting the trafficking of women into the sex industry, or the exploitation of sex workers' prostitution. However,

it highlights the delicate situation newspapers find themselves in when they have to choose between ethics and financial survival.

"I can't emphasise enough how much advertising revenues are worth for local newspapers. Local newspapers live or die on how much advertising they sell. I think it's purely financial and I think that unless there's some kind of threat of prosecution or loss of further revenue, then local newspapers won't stop printing the adverts."

Kirsty Whalley, freelance journalist

RECOMMENDATIONS

On the basis of the stakeholder interviews and available data and literature, this study makes a number of recommendations. Sex advertising is a complex issue with few simple answers and often contested evidence. The multifaceted international, multi-national, and multi-agency realities of sex work, migration and human trafficking mean that it is necessary to examine issues and interventions at the different levels of organisational and power structures: from local community groups to national and international legal frameworks.

Newspaper publishers

The minimum standard is for editors to have comprehensive safeguards in place to ensure that the advertising they accept is not linked to sex trafficking (newspapers should refer to the Met's and NS's guidelines for details of necessary safeguards). The most reliable way to ensure that local newspapers are not complicit in sex trafficking through their advertising policy, however, is to remove adverts for sexual services from their titles.

Decisions about the advertising policy of local newspapers should be made with their potential social impact in mind, and not purely be based on revenue. However, considering the substantial revenue that sex adverts bring in, local newspapers must evaluate their social responsibilities in conjunction with their viability as businesses. This may involve 'phasing out' sex adverts and seeking advice from publishers that have already addressed this issue. Newspaper publishers should instigate meetings with the local police, local authority and other relevant agencies to discuss the issue and ensure a coherent, consistent, practical and workable local approach.

The Newspaper Society

The Newspaper Society must take a stronger stance on the issue and hold publishers to account to ensure the problem is not being ignored. While the NS 2008 guidance on human trafficking is very useful, considering the revenue implications in removing adverts and the staff time implications of enforcing safeguards for accepting adverts, publishers are unlikely to take action unless they are held accountable. While not a statutory authority, NS is powerfully placed to be able to fulfill this important role.

The Government

"While the Government has not got the guts to actually make it illegal to pay for sex, they leave everyone in limbo. As long as it is still not illegal to pay for sex, why can we not have advertisements?... It's a hypocritical situation: they expect the women working in these flats to pay tax, but they don't get any protection by paying tax... we have to decide one way or the other what we're going to do in this country, and I don't think any of our governments have got the guts to either criminalise or decriminalise it. Meanwhile we have all these weird and wonderful laws that no one really knows how to interpret. Women don't understand it and it is a postcode lottery in a lot of ways".

Michelle Farley, Services Manager, SHOC

The Government must clarify its position on prostitution and sex advertising for any real progress in this area to be made in terms of reducing and responding to exploitation, including sex trafficking. The law is unclear, and confusing to those who need to interpret it. Although sex advertising is not illegal, profiting from the exploitation of another's prostitution is, which is a charge that may be levied against newspapers who accept adverts that are subsequently linked to brothels. If trafficked women are found in these brothels, then further trafficking legislation may apply. Legal reform to clarify/streamline these laws would make exploitation and trafficking crimes easier to police and prosecute.

Comprehensive research in this area is urgently needed. The Government is called upon to commission a comprehensive study on sex advertising in local newspapers and its links with sex trafficking, which would serve as a follow-up to Harriet Harman's 2008 "Women Not for Sale" report.

Joined-up approaches to addressing sex advertising

Joined-up working between different organisations is crucial for addressing sex advertising and its links with sex trafficking. A notable example illustrated in this study was the collaboration between CCAT (a community group) and Newsquest (a local newspaper publisher) that led to the lat-

ter removing sex adverts from all its publications. Organisations working with sex workers, such as SHOC, Open Doors, and others, also play a vital role in informing our understanding of the sex industry based on years of practice and first-hand evidence. Likewise, interactions between Government, the police and academic researchers are crucial. This joined-up approach allows the actors involved to learn from each others' experience and good practice, and to overcome barriers caused by ideological fault-lines between different parties.

Examining our discourses and attitudes

"Many of those women... would say to us, I know I can pay this debt off within six months. I'm going to stay working here for another year, because this is the only hope I have of being able to build up that nest egg, to be able to go back to Thailand and buy my trout farm, or buy my hairdressing salon in Romania, or go back to university... So, that's quite tricky, because you absolutely know you are working with somebody who is a victim of trafficking, but they are saying, 'Don't rescue me. I don't want to be rescued.' What you are doing is maintaining that relationship so that if things change, and things may change, they always know that they can say to you, 'No, actually, I've had enough, I want out.'"

Georgina Perry, Open Doors Manager, St. Leonard's Hospital

On a more discursive level, we have to bear in mind the complex gender dynamics at play in the

discourses we employ with regards to trafficking and prostitution. We have to remember that trafficking is not the only kind of vulnerability sex workers face, and this must be kept in mind when creating interventions to protect and support both trafficked sex workers, and the wider sex worker population. The focus on trafficking must not be deployed to the detriment of other sex workers (the majority) who are not trafficked.

Likewise, the idea of the 'victim' is a highly gendered one that can backfire when it singles out certain women for help, while ignoring others who are also at risk of exploitation or other kinds of vulnerabilities. Assuming that all women in the sex industry and all women involved in trafficking are helpless and hapless victims is a gender stereotype that is not useful in the long-term for dealing with complex questions around sex work, migration and trafficking. It is also an idea that can ultimately negate all women's agency, regardless of how one feels about sex work.

"Most importantly, the potential effect on women in the sex industry as a result of action from Police and local authorities needs to be seriously considered. Closing down flats, parlours and saunas by more extensive monitoring of the provision of licenses, and by proactively investigating sites clearly not providing advertised 'massage', will not seriously affect the size of the sex industry. Provision of exiting services, including safe housing for all women in prostitution who wish to leave must take place alongside any interventions planned by local authorities."

(Coy et al. 2007: 42)

LAW, POLICY AND REGULATION

Trafficking

International framework on human trafficking

“Human trafficking is the recruitment, transportation, transfer, harbouring or receiving of people, by means of threat, use of force, other forms of coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person controlling another person, for the purpose of exploitation.”

Palermo Protocol definition of human trafficking (The United Nations 2004)

The **UN Protocol to the Convention against Transnational Organised Crime to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children** (Palermo Protocol) (adopted in 2000) was the first international instrument to address human trafficking (as distinct from people smuggling) and is the primary framework used in this report, in the sense that its broad and inclusive definition of human trafficking most pertinently addresses the complex and diverse nature of human trafficking (The United Nations 2004).

United Nations Global Initiative to Fight Human Trafficking (UN.GIFT) was established by the UN Office on Drugs and Crime (UNODC) and runs in cooperation with varied stakeholders and international organisations such as the International Labour Organisation (ILO), the International Organisation for Migration (IOM) and the UN Children’s Fund (UNICEF), to “support each other’s work, create new partnerships and develop effective tools to fight human trafficking” (GLE Consulting 2011; UNODC 2012).

European framework on human trafficking

The UK became a signatory of the Council of Europe **Convention on Action Against Trafficking in Human Beings** on 1st April 2009. This means that the UK is now committed to implementing the Convention. “The Convention sets out measures to protect and promote the rights of victims of trafficking which States are obliged to implement”. This includes the identification of victims in order

to provide assistance and implement the recovery and reflection period (Chapter III: articles 10-17)” (Anti Trafficking Legal Project n.d.; Council of Europe 2005).

In 2006, the European Parliament passed a **Resolution on trafficking in the context of world sport events**. This resolution advised Member States to prepare for big sporting events by launching national awareness campaigns aimed at reducing demand for sex and other types of trafficking (European Parliament 2006).

In December 2010, the European Parliament voted in a new **Directive on preventing and combating trafficking in human beings, and protecting victims** aimed at creating a unified European legal framework to tackle trafficking. According to EU governing structures, a Directive is legally binding to the Member States towards which it is targeted, although it does not specify the methods by which Member States must enforce it. Denmark and the UK have opted out of this Directive (European Parliament 2011).

UK framework on sex trafficking

The following apply only to sex trafficking; other types of human trafficking are targeted by other legislation.

Sections 57-59 of the **Sexual Offences Act 2003** deal with the trafficking of persons into, within and out of the UK for the purposes of sexual exploitation (maximum penalty 14 years).

Section 14 of the **Policing and Crime Act 2009** has made it a strict liability criminal offence for someone to buy sex from a person who has been subject to force, threats or deception, i.e, a person who has been trafficked for sex or forced into prostitution, even if the buyer was not aware that the sex worker had been subject to force.

The **UK Action Plan on Tackling Human Trafficking** was created to align with the aims of the Council of Europe Convention on Action Against Trafficking, and to provide the UK’s human trafficking law enforcement framework (Home Office 2007).

The **UK Human Trafficking Centre (UKHTC)** was set up as a result of the UK ratifying the Action Against Trafficking Convention, as was the UKHTC-based National Referral Mechanism (NRM). It uses

the widely accepted Palermo Protocol definition of human trafficking in its work. The UKHTC works in a similar way to UN.GIFT, as a central port of call for inter-organisational cooperation within the UK, both to deal with the referral of suspected trafficking victims¹ through the NRM; and to focus on prevention, awareness-raising and working with local authorities. The UKHTC interacts with First Responders, organisations particularly well placed to come into contact with trafficked persons, such as the UK Border Agency, the Crown Prosecution Service and Police, and NGOs such as the Poppy Project and the Salvation Army (GLE Consulting 2011).

It has also been, rightly, pointed out that because trafficking offences are so hard to prosecute (due to the requirement to prove double intent: intent to move and intent to exploit), it is often necessary to invoke other laws to prosecute alleged traffickers. These include money laundering, sexual violence (including rape, and sexual abuse of children and vulnerable persons), kidnapping, false imprisonment, and immigration offences. This has the effect that “data on the numbers of suspected traffickers who have been prosecuted on charges other than human trafficking is not collected. This makes it difficult to assess whether or not existing legislation designed to fight human trafficking is fit for purpose” (GLE Consulting: 6).

UK law on prostitution

In the UK, prostitution itself is not a crime. Individuals are allowed to sell sexual services. However, a number of related activities are criminalised. For a full list of prostitution-related offences, see below. In addition, prostitution, under the Crown Prosecution legal guidance, is viewed within the broader umbrella of their Violence Against Women (VAW) strategy, and, where offences are committed, as a victim-centred crime. Drug-related offences, domestic or sexual violence, or other types of violence inflicted on sex workers (as a vulnerable group), such as human trafficking, are considered in conjunction with prostitution-related offences where appropriate (The Crown Prosecution Service n.d.).

Persistently **loitering or soliciting for prostitution** in a public place or street is an offence under section 16 of the Policing and Crime Act 2009.

Causing or inciting prostitution for gain is an offence under section 52 of the Sexual Offences Act 2003, wherein an individual intentionally causes

or incites another to enter into prostitution for his or her own gain, or that of a third party. Similarly, controlling prostitution for gain is an offence under section 53 of the Sexual Offences Act 2003, wherein one person controls the prostitution of another for his or her own gain, or that of a third party.

Keeping a brothel is illegal, in its various forms (whether keeping a brothel or permitting premises to be used for prostitution as a tenant or landlord), under sections 33-36 of the Sexual Offences Act 1956. In addition, section 33A of the Sexual Offences Act 1956, as inserted by section 55 of the Sexual Offences Act 2003, makes it an offence to manage, assist or act in the management of a brothel (i.e. the “maids” that often act as receptionists, cleaners or screen punters for the brothels or the sex workers therein).

Kerb crawling, the act of a person (including a person in a car) soliciting another individual for the purposes of buying sexual services from that individual in a street or public place, is an offence under section 51A of the Sexual Offences Act 2003, as inserted by section 19 of the Policing and Crime Act 2009.

UK law on sex advertising

There is no specific offence for placing advertisements in newspapers to advertise (illegal) establishments used to sell sex, even if under the guise of saunas, massage parlours and escort agencies. However, there is an offence of placing adverts in phone boxes (carding), which can lead to a maximum of 6 months in prison, under Section 46(1) of Criminal Justice and Police Act 2001.

The issue of whether an establishment is legitimately a massage parlour, sauna or escort agency is a difficult one. Many studies have found that a great number of establishments advertising themselves as legal “special treatment” venues are actually providing illegal sexual services. In fact, many London- and country-wide studies use newspaper advertisements as their main source of information about brothels (e.g. Jackson et al. 2010; Bindel and Atkins 2008; Dickson 2004; Coy et al. 2007). This does not mean that all “special treatment” establishments, which, under the London Local Authorities Act 1991, are licensed for such services as manicures, massage, tattooing, cosmetic piercing or saunas, are actually (or also) brothels. However, according to the Sex in the City report, it has been shown that many establishments who have been licensed as massage parlours or saunas are also used as brothels. Resources are scarce for local authorities to check whether licensed venues

¹ Those individuals who wish to be referred to the UKHTC because they believe to have been trafficked - there is no compulsory element

are not selling sex (Dickson 2004).

Despite there not being an offence for sex advertising, newspaper editors can nevertheless face criminal liability if it can be proven that advertising has “supported or promoted” offences relating to the following three areas of the law (Martin 2010):

1. **Controlling prostitution for gain:** are these newspapers aiding in the exploitation of someone else’s prostitution by publishing these adverts? *See: Section 53, Sexual Offences Act 2003*
2. **Trafficking offences** *See the various trafficking legal frameworks discussed above, especially Section 57, Sexual Offences Act 2003*
3. **Money laundering:** by accepting money obtained through illegal means (brothels), especially when this includes large amounts of cash, a newspaper can make itself vulnerable to being prosecuted for money laundering. *See Part 7 of the Proceeds of Crime Act 2002*

“The brothel market is vulnerable to exploitation across the board; it’s extremely attractive to organised criminality because of the sheer volume of cash that can be made.”

Detective Chief Inspector Nick Sumner, Human Exploitation and Organised Crime Command (SCD9)

The Newspaper Society guidelines

The Newspaper Society represents and promotes the interests of Britain’s regional and local media. It was founded in 1836 and is believed to be the oldest publishers’ association in the world. The sector is focused on providing local news and information across its 1,100 daily and weekly, paid-for and free newspaper titles, and 1,600 websites. The mission statement of the Newspaper Society is as follows:

“The NS is the voice of Britain’s regional and local media. It exists to promote newspapers’ interests in all political, legal and regulatory matters and to promote their strengths as news and marketing media”

(NS 2012a)

In the Newspaper Society’s Annual Review 2010-2011, Georgina Harvey, the President of NS, highlights some of the reasons local media are ‘here to stay’ despite economic stagnation. A key reason she mentions is to do with their potential as an advertising platform saying that local media are, “A highly effective platform for advertisers to connect with communities; no-one else can deliver such highly-engaged, responsive audiences – with over 70% of people acting on the advertising they see” (NS 2011).

“Local newspapers are hugely important to our country – for two good reasons. First, they strengthen our democracy, holding the powerful to account. Whereas national newspapers can focus on the bigger picture, it’s local papers that often really analyse the detail of what central and local government is doing and the impact their policies have on the ground... Second, local papers are hugely important in helping to build a bigger, stronger society. There is a massive gap between the state on the one hand, and the individual on the other, and local papers help fill the space in between, galvanising readers into action. That could be by campaigning on local issues, highlighting local clubs, groups, businesses and societies and encouraging people to get involved, or championing local people who are playing their part to make their community a better place.”

Prime Minister David Cameron (quoted in the Newspaper Society’s Annual Review 2010-2011)

In light of the importance of local newspapers (see David Cameron quote) in terms of filling the gap between the individual and the state through, for instance, campaigning on local issues, the power of advertising in local media in engaging responsive audiences (Georgina Harvey quote) and the authority of the Newspaper Society as the oldest such association in the world, one would expect that the Newspaper Society takes a lead on addressing the issue of sex advertising in local newspapers. In fact, while the Newspaper Society did indeed produce a set of guidelines in 2008 for newspapers to refer to in dealing with this issue, it appears to have since fallen off the NS agenda in line with the Government’s waning attention to it.

The 2008 NS guidelines on tackling human trafficking were produced in response to the Government campaign against human trafficking topical at the time whereby “Ministers have stated that small ads at the back of local newspapers are often used to sell trafficked girls - ‘new girls everyday’, ‘international ladies 24/7’ and that police believe that the advertisements can fuel demand and perpetuate this trade.” (Newspaper Society guidelines 2008). The NS guidelines document states that the NS “has always advised publishers not to publish advertisements for illegal establishments and activities” and “suggests adoption of protective policies, such as checks on qualifications, to ensure that the advertised service is indeed legitimate and lawful”. The guidelines summarise options of

“The Newspaper Society like to hide behind the fact that, ‘oh the government hasn’t taken a stance on this’”

Kirsty Whalley, freelance journalist

steps for publishers¹ to take to ensure that they are not complicit in sex trafficking through the adverts they display in their publications. The guidelines are very useful in that they make suggestions on what type of ads to refuse (e.g. those that make reference to specific ethnicities), training for staff, consulting with police and Local Authorities and only taking payment by cheque or credit card so accounts can be traced.

However it is not clear that the NS has followed-up with individual publishers and newspapers to ensure that they are taking the guidelines into account and addressing the issue of sex advertising. Indeed, the fact that most major publishers of London local newspapers have not removed sex advertisements from all of their titles and some are not engaging with the Metropolitan Police on this issue at all despite being approached by them (Metropolitan Police interview), would suggest that the NS has not done this, at least not successfully.

1 The terms ‘editor’ and ‘publisher’ in relation to local newspapers clearly have distinct meanings and in this report we will refer to ‘publishers’ as having responsibility for the issue of sex advertising, as editors of individual titles do not necessarily have the power to make such policy decisions.

METHODOLOGY

(EMPIRICAL)

The empirical component of this study took the form of in-depth semi-structured interviews with key stakeholders of the issue of sex advertising in London local newspapers and its potential links with sex trafficking.

Sample

The participants in this study were individuals identified by the researchers as key stakeholders in relation to the research topic. The aim was to recruit people working for relevant organisations such as local newspapers, non-governmental organisations (NGOs), sex workers' groups and the police, among others. In total, 13 stakeholders were successfully recruited for interview. Many more were contacted, but either did not respond or did not agree to be interviewed. A notable gap in the final sample was that only one representative of local newspapers, Andrew Parkes, a group editor for Newsquest, agreed to be interviewed, Newsquest being the only local newspaper publisher that has banned sex adverts from all its titles (including, of course, its London titles).

Recruitment

Potential participants were contacted via e-mail that described the research and suggested possible dates for the proposed interview. Upon receiving a positive response to the initial e-mail, a suitable time and location for the interview was arranged.

Data collection

Data was collected through semi-structured interviews conducted in the period November 2011- February 2012. The interviews were conducted by one or both of the researchers. Interviews were chosen as a data collection method rather than more quantitative approaches such as questionnaires as the aim was to gain insight into stakeholders' views and experiences rather than simple facts or simplistic statements (Denscombe 2007). The semi-structured format allowed the interviewers to steer the interview onto topics relevant to the research focus while giving the respondent the space to re-define the topic in order to generate novel insights for the researcher (Willig 2001).

There are several advantages of stakeholder interviews as a data collection method. Stakeholder interviews are valuable for confirming what has been established from other sources (Tansey 2007). For the current study, the data from the stakeholder interviews was considered in conjunction with secondary sources such as policy documents, non-governmental organisation (NGO) research reports and newspaper articles. Stakeholder interviews are also useful in terms of providing new information to advance the research process (Davies 2001).

Most of the interviews were conducted face-to-face

as opposed to over the phone due to the documented value of the one-on-one, face-to-face setting for building rapport between interviewer and interviewee. Four interviews were conducted over the phone. In these instances, arranging a face-to-face interview was not possible due to practical difficulties. The researchers used Skype to phone these participants and recorded and analysed them in the same way as the face-to-face interviews.

Interview questions

The interview questions covered the following themes in relation to the focus problem of sex advertising in London local newspapers: the stakeholders' work relevant to the issue of sex advertising in London local newspapers; views on the existence and nature of the link between sex advertising and sex trafficking, as well as evidence for this link; views on whose responsibility it is to address the issue of sex advertising in local newspapers.

While the same key questions were posed to each interviewee, the rest of the discussion was tailored for the participants with regard to the types of work they do and the responses they gave to the core questions.

Data analysis

Interviews were fully transcribed into Microsoft Word format according to the conventions outlined by Silverman (1997). Data analysis took the form of identifying themes from repeated readings of the interview transcripts. Quotes were then chosen to illustrate different themes.

Ethical considerations

Informed consent and voluntariness

Participants were informed of the procedure and aims of the study and the voluntariness of participation during the recruitment process as well as at the start of the interview.

Confidentiality

Issues concerning confidentiality, including people's right to control their information and protect their privacy were taken into consideration in the design and procedure of the study. Only the researchers had access to the recordings and transcripts of the interviews. Participants were informed of their right to request that no audio recording be made of the interview, and one participant chose this option. Participants were also given the option to remain unnamed in this research. One participant opted for this option. Most of the interviewees asked for any quotes used in the final report to be approved by them prior to dissemination/publication. Contact details of the researchers were provided in the recruitment e-mails should participants wish to add to, clarify, or withdraw their responses at a later date.

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READING BETWEEN THE LINES: EXAMINING THE LINKS
BETWEEN ADVERTISEMENTS FOR SEXUAL SERVICES
AND TRAFFICKING FOR SEXUAL EXPLOITATION

By Halliki Voolma and Melisa Trujillo

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