

Joint Submission to the MOPAC Consultation on its Draft Police & Crime Plan for London 2017-2021

28 February 2017 | [Nordic Model Now!](#)

Groups making this submission

This submission is made to the MOPAC consultation on its [Draft Police & Crime Plan for London 2017-2021](#) jointly by the following groups that work for women's rights and development, and/or to resist the objectification of women and girls, and male violence against women and children. Information about the groups is provided at the end.

1. Nordic Model Now!
2. A CALL TO MEN UK
3. Campaign Against Sex Robots
4. European Network of Migrant Women
5. JURIES
6. London Feminist Network
7. Not Buying It!
8. Object
9. Older Feminist Network
10. Rooms of Our Own
11. Scary Little Girls
12. Stand Up For Women
13. White Ribbon Campaign
14. Zero Option Sheffield

Summary

We welcomed Sadiq Khan's [pre-election promise](#)¹ to deliver on the previous MOPAC strategy on prostitution. Part of the [Mayoral Strategy on Violence against Women and Girls](#),² this focused on:

- The provision of holistic support to address the physical, sexual, substance use, mental health and housing needs of women to support women to exit prostitution.
- Addressing the demand side of trafficking and prostitution.
- Focusing enforcement on those that pay for sex e.g. kerb-crawlers and not women involved in prostitution.
- Facilitating the reporting of sexual offences and other crimes against women involved

in prostitution through third party reporting schemes.

- Clamping down on those who control women in prostitution e.g. pimps and traffickers.

The new draft strategy mentions prostitution only once, on page 50:

“MOPAC will work with the MPS, local authorities and the voluntary and community sector to develop a better understanding of the prevalence of prostitution in London and to commission services to support women involved in prostitution to exit.”

The new draft strategy does not mention tackling men’s demand for prostitution or clamping down on pimps. We believe that this betrays a lack of understanding of: the high levels of violence experienced by women in prostitution and how violence is intrinsic to it; the role of sex buyers (punters) in driving the entire system and of the pimps and traffickers in drawing women and children into prostitution and keeping them there; prostitution’s central role in child sexual exploitation (CSE) and sex trafficking; and of prostitution’s role in creating a conducive context for violence against women and girls in the general population.

We are therefore profoundly disappointed in the change of direction regarding prostitution in the new draft strategy, and the abandonment of the commitment to addressing men’s demand for trafficking and prostitution and clamping down on pimps and traffickers. We believe that this change of direction is in direct contradiction of the mayor’s pre-election promise and we urge him to address this as a matter of urgency.

We set out our detailed concerns that relate to the particular sections of the draft strategy below.

Strategic policing capabilities: Tackling serious and organised crime

We are dismayed that this section of the strategy lacks a thorough gender analysis and an understanding of the specific issues around prostitution, child sexual exploitation, and sex trafficking.

[Analysis](#)³ by Eurostat, Europol and UNODC has found that human trafficking for the exploitation of prostitution and other forms of sexual exploitation (sex trafficking) is the most common form of human trafficking in Europe and that victims of this form of trafficking are mostly (96%) women and girls. That the NRM statistics do not reflect the dominance of sex trafficking does not change the reality. Instead it suggests limitations within the NRM system and the consequences of not prioritising the policing of these heinous crimes.

A September 2016 [report on research](#) ⁴ by the Police Foundation showed that organised crime is heavily involved in running the sex trade in the UK. More than three-quarters of brothels were found to be linked to criminal gangs and the movements of about one third of the prostituted women were controlled – suggesting that they are trafficked. The report criticised the police for failing to tackle the criminals who control much of the off-street sex industry. As this report was published two months before the draft strategy, we are dismayed that the draft strategy does not take it into account and attempt to address the weaknesses in police strategy that it highlights.

Other [evidence](#) ⁵ suggests that where pimping and brothel keeping are tolerated, sex trafficking is higher. It follows that to reduce sex trafficking, the strategy must include a zero-tolerance approach to pimping and brothel keeping – not least because pimping is prohibited under [CEDAW](#) ⁶ and [usually does satisfy the elements of sex trafficking](#),⁷ as defined in the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (the [Palermo Protocol](#)).⁸

We believe therefore that a proactive London-wide strategy for identifying sex trafficking victims and their perpetrators is needed. As there is not a market for trafficked women and girls separate from the general prostitution market, the strategy needs to be applied to **prostitution itself**.

Sex trafficking can never be as hidden as forced labour, because profits are dependent on a steady flow of punters who must be able to find the women. To the punters, the sex trafficked and pimped women are typically indistinguishable from other women in prostitution. If she is not coerced by individual perpetrators, she is likely to have been coerced by circumstances of poverty, racism and inequality, a history of sexual abuse and growing up in a culture that objectifies women and girls and reduces their sense of possibilities.

The strategy should therefore not rely on punters to identify and report sex trafficking victims. Punters do not have a good record at reporting sex trafficking victims. For example, a dedicated [Crimestoppers](#) ⁹ trafficking helpline aimed at sex buyers received only three calls in an entire year.

If the punters can find the women, law enforcement agencies can find them too. We call for the prioritisation and resourcing of the policing of prostitution, with the target being the traffickers, pimps, brothel keepers and punters, and not the prostituted persons.

We recommend that law enforcement agencies take the advice of the European Commission's [Study on the Gender Dimension of Trafficking in Human Beings](#) ¹⁰ and develop gender expertise in relevant cybertechnologies in order to identify victims and traffickers/pimps, including the movement of their illicit profits.

It can be hard for victims of sex trafficking to come forward for support. [Research](#) ¹¹ has found that they are often highly vulnerable due a combination of circumstances, including low levels of education, extreme poverty, childhood abuse, and/or experiences of violence

and corruption at the hands of older relatives and state officials. This and the extreme levels of trauma, fear, anxiety and physical and mental health problems caused by their experience within prostitution/as sex slaves, make it difficult, if not impossible, for many to trust officials and service providers or to make effective witnesses against their perpetrators.

In order to be successful at reducing sex trafficking, the strategy needs to tackle the demand for prostitution itself – for example, through public education campaigns, zero tolerance of kerb crawling and buying sex from someone who has been coerced (using Section 53A of the Sexual Offences Act 2003), and ultimately the introduction of the [Nordic Model](#)¹² (which makes sex buying *per se* a criminal offence), along with measures to address the objectification of women and girls in the wider culture, poverty, gender inequality and the subordinate position of women and girls.

Failure to address the particularities of sex trafficking and its gender dimension will inevitably also mean a failure to achieve [SDG5](#)¹³ and binding obligations under CEDAW and the Palermo Protocol.

When trafficking is for forced labour, the person is forced to work – on a farm or in a nail boutique, for example. When the purpose is the exploitation of prostitution, the victim is treated as an object that ordinary men in the community pay to sexually abuse for their own sexual and narcissistic benefit. Profits are huge because millions of ordinary men do this. It is these easy and excessive profits that drive sex trafficking.

All trafficking, slavery and forced labour is abhorrent. However, it is important to recognise that the harms, physical, reproductive and psychological, of sex trafficking are of a different order from other forms of exploitation, such as forced labour. Sex trafficking typically involves being forced to endure unwanted sexual contact, including penetration of the anus, vagina and mouth, multiple times a day, which has grave implications for physical, psychological and reproductive health. It is sexual assault and rape – for another person's profit. Rape is recognised as a uniquely abhorrent and damaging offence. We are concerned therefore that the strategy does not spell out that sex trafficking victims are likely to have extreme needs, require specialised services within an all-female environment, and take longer to recover.

We believe that the strategy's gender neutral approach to trafficking is mistaken and is bound to lead to a misrepresentation of the reality. Furthermore, it will not be possible to measure the actual success or otherwise of the strategy unless **all data** is disaggregated by sex and age.

A better criminal justice service for London

A higher quality of services for Londoners

We welcome the introduction of a “victims commissioner.” However, we are concerned that without a thorough gender analysis and understanding of the implications of sexual and intimate partner violence, the benefits to women and girls who have been victims of male violence may be limited. Similarly we are concerned about the emphasis on restorative justice and question whether this is ever appropriate for VAWG.

Race, disproportionality and inequality in the criminal justice service

We welcome the analysis of race as a factor leading to disproportionality and inequality in the criminal justice service. However, we lament the lack of similar analysis based on sex. We believe there is evidence that women and girls also get a raw deal in the criminal justice system – both in terms of disproportionality of sentencing and also in how they are treated when they report crimes against their person and afterwards by the criminal justice system.

We call for all data to be disaggregated by sex and for a commitment to thorough gender analysis of all criminal justice issues.

Reducing levels of repeat victimisation and repeat offending across London

A [UN multi-country study](#)¹⁴ found that men perpetrating rape of non-partners and/or violence against intimate partners are associated with prostitution buying. Studies of [prostitution buyers](#)¹⁵ have found they are more likely to commit rape and other aggressive sexual acts. In addition, the contempt they have for women is borne out by [survivor testimony](#)¹⁶ and [research on punter forums](#).¹⁷

We therefore lament the lack of an understanding of prostitution as a factor leading to men being more likely to commit rape and other violence against women and children and to make them more likely to reoffend.

Keeping children and young people safe

We are concerned that the terms “child sexual exploitation” (CSE) and “sexual abuse” are used almost interchangeably in this section. And unlike the detailed strategy on knife, gun and drug crime, there is no detail about how these crimes are to be tackled. We fear that this means that the strategy is unlikely to be successful in tackling the most heinous crimes of child sexual exploitation and child sexual abuse.

At the bottom of page 40, the strategy says in regards to child sexual abuse that it “affects girls and boys alike.” This is true. However, most research suggests that it is significantly [more common for girls](#)¹⁸ to be sexually abused, particularly now that many [boys are acting](#)

[out](#)¹⁹ what they see in online porn on their [female classmates](#)²⁰ and younger family members. Similarly in the big CSE cases in Rotherham, Oxford and elsewhere, a large majority of the victims were girls. For example, of the 373 child victims believed to have been targeted by the exploiters in Oxford, [only about 50 were boys](#).²¹ Without understanding the true nature of the problem, it is unclear how a strategy to address it can be successful.

The widespread availability of online porn and the pornification of mainstream culture objectifies and commercialises female bodies and commodifies youth. There is increasing evidence that this is a form of sexual abuse, which robs girls of their right to develop and explore their sexuality on their own terms and in their own time. Instead the very culture is grooming them to accept a life of objectification and service to men's needs rather than their own. This in turn limits the development of their own personhood in other areas of life: exploring the world, achieving in and out of school, developing social networks, etc.

For example, a [report](#)²² produced by the American Psychological Association in 2007 found that the growing sexualisation of women and girls in the media and popular culture not only negatively impacts on the well-being and health of women and girls but actually contributes to sexism and sexual exploitation and provides a conducive context for violence against women. It also found that the sexualisation and objectification of women in the media and popular culture teaches girls that all they have to offer is their body and face, and that they should expend all their effort on physical appearance and attractiveness to males. We believe that these factors make it particularly hard for girls to identify and resist pressures from predatory individuals who target them. It also contributes to a general social sense that girls themselves are to blame when things go wrong. For a powerful personal account of this dynamic, see Suzzan Blac's personal story of being sex trafficked as a girl in [Prostitution Narratives](#).²³

We are particularly concerned that the strategy lacks awareness that the vast majority of CSE is in reality the prostitution and pimping of children and that it is driven by demand from men and the profits that can be made therefrom.

[Rachel Moran](#)²⁴ says of her time answering phones in a brothel:

“One of the commonest questions that comes through on any brothels phone line is ‘What age is the youngest girl you have?’ I could not count the times I have been asked that question, and I defy anybody who has answered a brothels phone to tell the blatant lie that it is not the commonest question they’ve been asked too.”

The prostitution of children cannot be separated from prostitution *per se*. So to effectively tackle the sex trafficking/pimping/prostitution/CSE of children, the strategy must tackle prostitution and the demand from men for it. [Research](#)²⁵ has shown that most men would be most deterred by the threat of personal consequences, such as being exposed as a sex buyer to family and work colleagues and/or being placed on the sex offenders register, or being faced with a sizeable fine or prison sentence. Educational programmes were the least likely to act as

a deterrent. This is therefore a strong argument for the [Nordic Model](#),²⁶ with increased penalties for buying a child for sex.

Pornography, which is itself a form of prostitution, serves to normalise prostitution and it eroticises imbalances of power. As such it plays a role in the demand for prostitution, including the prostitution of children. We therefore believe that the strategy must also address pornography.

We call for all data to be disaggregated by sex and for a thorough gender analysis of all criminal justice issues relating to sexual crimes against children.

Giving young offenders a better chance to turn their lives around

We welcome the commitment to helping young people who have been involved in crime to turn their lives around, including improving pathways into apprenticeships and jobs for them. However, we lament a lack of a similar commitment to help young people whose lives have been blighted by child sexual exploitation and abuse to turn their lives around, including improving pathways into apprenticeships and jobs for the girls and young women who have been affected.

Tackling Violence against Women and Girls (VAWG)

As mentioned earlier, we are dismayed at the lack of joined up thinking and strategy regarding prostitution, sex trafficking and child sexual exploitation, which we do not believe can be either understood or tackled effectively as separate issues, and which we believe underpin other forms of VAWG in that it creates a conducive context for it.

MOPAC commissioned a study on prostitution and trafficking very recently and we note that its key recommendations have yet to be implemented. We question the appropriateness of the first plank of the new strategy – namely to “work with the MPS, local authorities and the voluntary and community sector to develop a better understanding of the prevalence of prostitution in London,” while we welcome the second plank – the commissioning of services to support women to exit prostitution.

We do not believe that developing a better understanding of the problem is anywhere near a strategy for dealing with it. We believe that the evidence is already overwhelming that prostitution is part of the continuum of violence against women and girls and that it is both the result and part of the root cause of women’s inequality and VAWG.

We call for the reinstatement of the previous MOPAC strategy regarding prostitution and for its London wide implementation.

Sexual harassment

We [wrote to Sadiq Khan](#)²⁷ in June last year to draw to his attention the appalling levels of street harassment of young women on the streets of Leyton and how this had coincided with an explosion of stickers on street furniture advertising prostitution in the area. During our meeting at City Hall to deliver the letter, officials told us that each incident of street based sexual harassment is a crime but that if women do not report it to the police, the prevalence of this crime will not be officially recognised and therefore no resources will be allocated to tackling it. We asked for a simple reporting system to make it easy for women to report it.

We note that the [Report It to Stop It](#)²⁸ initiative has been implemented on public transport in London and that page 56 of the draft strategy makes a commitment to developing smartphone apps and online facilities to report “hate crime.” We are dismayed that no similar commitment has been made to providing women with a simple way to report street-based sexual harassment. This is surely the proof, if any were needed of the normalisation and minimisation of this form of violence against women. It is clear that only a tiny proportion of sexual harassment incidents are reported to the authorities, yet we know from research that this is the [most common form of sexual violence](#).²⁹

Recent research conducted by Dr Maggie Wykes at the University of Sheffield³⁰ found that the emotional after-effects of a sexual harassment incident are: uncomfortable 80%; frightened 40%; angry 60%; embarrassed 50%; disgusted 45%. The biggest behavioural responses to the experience were: avoid going out at night; avoid going out alone; try to change appearance. When asked if they had told anyone, 70% had told a friend. When asked if they had reported the harassment to the police, responses were: 70+% thought it was not serious enough; 16% were too embarrassed; 22% didn't think anyone could help. Nottinghamshire Police has now classified such harassment as a [misogynistic hate crime](#).³¹

Sexual harassment is a commonplace experience in women's everyday lives (see for example the [Everyday Sexism Project](#)³²) and women do not expect to be taken seriously if they do report it (indeed, 85% of *rapes* are [never reported](#)³³ and a sizeable proportion of women say this is because they fear being treated disrespectfully and/or being disbelieved).*

It is essential that MOPAC takes a strong and proactive approach to recognising the extent of the problem of sexual harassment and of the impact it has, rather than a reactive approach that puts the burden on victims of sexual harassment and other forms of sexual violence to prove their experiences and the harm it has caused them.

** We are grateful to [Zero Option Sheffield](#) for letting use text from their recent submission to Sheffield City Council in this and the previous paragraph.*

About the groups making this submission



Nordic Model Now!

A grass-roots group campaigning for the abolition of prostitution and the adoption of the Nordic Model approach to prostitution in the UK. The group is made up of women from a variety of backgrounds and includes survivors of prostitution and child sexual exploitation, academics, journalists and teachers.

<http://nordicmodelnow.org/> | [@nordicmodelnow](https://twitter.com/nordicmodelnow)



A CALL TO MEN UK

A CALL TO MEN UK seeks to actively engage boys and men in ending male violence against women and girls and creating a more respectful, safer society for all in the process.

<http://acalltomenuk.org.uk/> | [@ACallToMenUK](https://twitter.com/ACallToMenUK)



Campaign against Sex Robots

A non-profit group against the development of robotic technologies shaped by inequalities and objectification of women and children.

<http://campaignagainstsexrobots.org/> | [@RobotCampaign](https://twitter.com/RobotCampaign)



European Network of Migrant Women

The largest umbrella organisation of migrant-led women's non-governmental organisations within the European Union, working to promote migrant women's rights, the concerns, needs and interests of migrant women in the European Union. Membership extends to organisations in 20 EU member states.

<http://www.migrantwomennetwork.org/> | [@ENoMW](https://twitter.com/ENoMW)



JURIES

A campaign to introduce mandatory juror briefings on rape myths and realities in all rape, sexual assault and childhood sexual abuse trials.

<http://juriesunderstandingsv.wordpress.com/> | [@UnderstandingSV](https://twitter.com/UnderstandingSV)



London Feminist Network

A women-only group that works with other groups to increase women's resistance to male violence against women in all its forms including pornography and prostitution. We also organise our own campaigns such the London Reclaim The Night march against rape and male violence.

<http://londonfeministnetwork.org.uk/> | [@LDNfeminist](#)



NOT BUYING IT!

A UK-based group that challenges the objectification of women in the media and general culture.

www.notbuyingit.org.uk | [@not_buyingit](#)



Object

Working for better representation of women and girls in the media, and against sex object culture.

<http://objectupdate.tumblr.com/> | [@ObjectUpdate](#)



Older Feminist Network

The Older Feminist Network (OFN) was formed in 1982 as an initiative from Spare Rib magazine's collective and has met regularly ever since.

<http://www.olderfeminist.org.uk/>



Rooms of Our Own

Seeks to provide safe, affordable and accessible space for women's organisations.

roomso4own.wordpress.com | [@roomso4own](#)



Scary Little Girls

An artist-led theatre company that promotes the artistic work of women in all aspects of theatrical story-telling.

<http://www.scarylittlegirls.co.uk> | [@ScaryLittleGs](#)



Stand Up For Women

Standing up for women's rights – with a heavy emphasis on comedy in the process! We host comedy galas featuring some of the nation's favourite comedians and run campaigns.

<http://www.standupforwomen.org.uk/> | [@StandUp4_Women](#)



White Ribbon Campaign (UK)

Men challenging and speaking out about male violence against women and girls.

www.whiteribboncampaign.co.uk | [@menantiviolence](#)



Zero Option Sheffield

Zero Option Sheffield

Campaigning to make Sheffield strip club free.

<http://zerooptionblog.wordpress.com/> | [@ZeroOption4Shef](#)

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14 <http://www.svri.org/sites/default/files/attachments/2016-07-19/RBAP-Gender-2013-P4P-VAW-Report-Summary.pdf>

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16 <http://nordicmodelnow.org/testimonial/>

17 <http://nordicmodelnow.org/myths-about-prostitution/myth-punters-care-about-the-women-they-buy/>

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23 Prostitution Narratives: Stories of Survival in the Sex Trade edited by Caroline Norma, Melinda Tankard Reist. Spinifex Press, 2016

24 <http://theprostitutionexperience.com/?p=135>

25 http://www.eavesforwomen.org.uk/Documents/Recent_Reports/Men%20Who%20Buy%20Sex.pdf

26 <http://nordicmodelnow.org/what-is-the-nordic-model/>

27 <http://nordicmodelnow.org/2016/07/22/street-harassment-and-prostitution-making-the-connections/>

28 http://www.btp.police.uk/advice_and_information/how_we_tackle_crime/report_it_to_stop_it.aspx

29 Dr Fiona Vera Gray has researched this form of sexual violence extensively:

<http://www.opendemocracy.net/5050/fiona-vera-gray/men-s-intrusion-rethinking-street-harassment>

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<http://www.bbc.co.uk/news/uk-england-nottinghamshire-36775398>

32 <http://everydaysexism.com/>

33 See Rape Crisis England and Wales who cite the Crime Survey England and Wales statistics from 2013

<http://rapecrisis.org.uk/statistics.php>