

NMN response to the ‘Independent Review’ of the Holbeck red-light zone in Leeds

Nordic Model Now! | 11 July 2020



We have [written before](#) about the controversial Holbeck area of Leeds that is designated as a decriminalised zone for street prostitution – the ‘Managed Approach’ (MA) in official speak. It is much hated by the local residents because it is a magnet for creepy men from all over the north of England and even further afield, who crawl the streets in their cars leering at women and girls and looking for vulnerable women who they can pay to use and abuse sexually. Not to mention the distress at witnessing women, who are trapped in a cycle of being sexually used and abused by these men, and the sinister presence of the pimps and traffickers who keep watch on them, their personal gravy trains.

After pressure from campaigners, in 2019 Leeds City Council (LCC) commissioned a so-called ‘Independent Review’ (IR). It was undertaken by the Applied Criminology and Policing Centre, at the University of Huddersfield and their [final report](#) was released on Friday, 10 July 2020.

I visited the Holbeck zone last summer and [wrote a report](#) about what I learned. Contacts in the area say that nothing much had changed when the lockdown was introduced in late March this year. The Managed Approach was purportedly put on hold for the duration of the lockdown, but I’m reliably informed that a considerable amount of street prostitution continued in the surrounding area, and is rapidly increasing now as the lockdown eases.

Jenny’s response

I had a chat with a woman, who I’ll call Jenny, who lives about a mile from Holbeck and asked for her thoughts on the report. She said:

“I’m gutted. It’s not representative of feeling in the community at all. I quite often walk through Holbeck on my way to town, and men always leer at me and wolf whistle – even though I don’t go down the designated streets.

Three times in the last ten days alone, a man has pulled over beside me and propositioned me. And I’m in my 40s! I absolutely hate it. But imagine how terrifying it is for teenage girls. Why did the researchers not look into this impact properly?

They restricted their survey of residents to those living in a very small area – but the impact spreads out much further. I didn’t get a voice at all even though I only live a mile away. And the researchers didn’t even organise a single community meeting. They came to our Voice of Holbeck community meetings – but shouldn’t they have organised a special one to reach to more residents?

The reviewers complained that only a small proportion of residents responded to their survey – which was an online one. Every household in the very narrow area they drew up was supposed to receive an envelope about the survey with a unique access code. But why would they think an online survey with a special access code would be appropriate for this low-income neighbourhood? I suspect many people didn’t even open the envelope thinking it was just a circular. Many of the residents are transitory and so are unlikely to be motivated to go through the palaver of responding – although they might have had something to say if access had been easier – and many others are pensioners without a computer or Internet access, and some have low literacy skills.

I also think that the community are suffering from survey fatigue. The council did a survey shortly before the review started last year. Then Voice of Holbeck did one and then we had the review. I think people think, what’s the point? I’ve already told them what I think.

The local situation is so bad that I’ve decided to sell my house – My son’s coming up to secondary school age and I simply don’t want him to be a teenager in this area. What kind of message is it giving our children?”

No moral compass

Right at the front of the report, under the impressive list of names of the authors, which includes three professors and three people with doctorates, there’s a curious note:

“On appointment, all members of the Independent Review Team signed an agreement declaring that they had no moral, religious or ideological stance or viewpoint with regarding on-street sex work in Leeds or anywhere else.”

Prostitution has been recognized by the United Nations Committee on the Elimination of Discrimination Against Women to be a form of gender-based violence – meaning that not only is prostitution inherently violent, but it is also an intrinsic part of the systemic oppression of women and girls.

What does having ‘no moral stance or viewpoint’ on a recognized form of violence mean? Would these illustrious academics have seen fit to add such a statement to a study of any other form of violence, systemic inequality, such as racism, or even of theft and burglary? Of course not. It would be unthinkable. So why would they think it appropriate to make this statement about an institution that has such a devastating impact on women?

The Oxford English Dictionary defines ‘moral’ as: ‘Concerned with the principles of right and wrong behaviour,’ and it defines ‘criminology’ as, ‘The scientific study of crime and criminals.’ How do these academics decide what should be a crime if not through some consideration of what is right and wrong?

It seems to me that what their statement is really saying is that they do have a position on prostitution and it is that prostitution must not be seen or challenged as a systemic issue; it must not be seen as a form of violence against women and girls; it must not be understood as part of the context of women’s and girls’ inequality.

That they didn’t have the intelligence to see that this is what their statement really means, is an indication of the quality of the report – a report that is riddled with typos and that even misrepresents the current law.[*]

Throughout the report there is evidence of the reviewers’ depressing inability to read between the lines or to consider the wider context, and an unquestioning acceptance of the legitimacy of the sexist status quo.

By the time I got to the end, I couldn’t help wondering how any reputable academic would want to put their name to such an embarrassingly shoddy report.

Dereliction of equality duty

The reviewers did not investigate the equality impact of the scheme. Although this may have been a failure in the specification for the project, I am not sure that lets them off the hook.

Leeds City Council is required under the Public Sector Equality Duty (PSED) to consider the impact of their policies on certain disadvantaged groups (known as people with protected characteristics). They must also consider the need to eliminate unlawful discrimination and harassment to those groups, to advance equality of opportunity, and to foster good relations between those who have a protected characteristic and those who do not.

Prostitution is a gendered phenomenon. Although some men are involved in prostitution, the vast majority of those bought and sold are female and almost all prostitution buyers are male. This means the impact on women and girls is significantly different from the impact on men and boys. Similarly, the impact on young people is greater than on older people. There is also a [racist dimension](#) to prostitution. This means that when considering policy around prostitution, Leeds City Council has a very strong obligation to consider the equality impact on women, children and racialised groups.

Leeds City Council should therefore have asked for an equality impact assessment in the specification for the review. That the reviewers did not consider the equality impacts at all suggests that Leeds City Council didn't include that in the specification. However, as academics working in the field of criminology and policy they should surely understand the law – so it seems extraordinary that they didn't even include a note about the equality impacts, let alone give serious consideration to the impact on the human rights and safety of women and children, and the impact on relations between women and men, and between adults and children.

The ineptness of the reviewers is emphasised on page 50, where they say:

“Perhaps the most significant finding from this small sample of residents is that it was women and those with children that reported feeling least safe walking/travelling through Holbeck and who were the least optimistic in terms of the MA meeting the strategic aims.”

Doh!

Of course, endless men driving slowly round the local streets leering and propositioning them is going to affect women and girls more profoundly than men! Of course parents are going to worry about their children getting drawn into the criminal milieu that thrives anywhere that prostitution is tolerated.

And their solution to this systematic terrorisation of women and girls in this poor neighbourhood?

“How can we make the women residents of Holbeck feel safer and less intimidated by the problems associated with on-street sex work?”

Recommendation 15. To devise and stage a positive campaign amplifying the positive aspects of being part of Holbeck, including respect for all in Holbeck (not focusing on the MA). This should be jointly developed and presented by residents and businesses of Holbeck. Possibly a ‘We love and respect Holbeck’ month?”

The overwhelming response from residents was that women and girls being propositioned for sex in the street remains a severe problem.

Women have written endlessly about the impact of kerb crawlers. It is sexual harassment and when it is rife, women aren't safe – regardless what they feel.

This is a serious human rights and equality issue – it makes the streets threatening for women and girls, so many avoid going out, particularly in the evening, and this impacts their ability to participate fully in public life on the same terms as men.

But the researchers are blind to these implications and appear not to want to actually make women safer – they just want to make women **feel** safer – or, more likely, to make it look like something is being done. Because their solution is a 'We love and respect Holbeck' PR event that will materially change nothing.

If I was a woman living in or near Holbeck, I would be raging right now.

Shared responsibility for organized crime?

But it doesn't stop there – because another key recommendation suggests that the Holbeck community needs to step up and share responsibility for the Managed Approach:

“Responsibility also needs to be shared with the community so that there is a shift in the thinking that solutions to the problems caused by on-street sex working lie solely with police and LCC.”

The scheme was imposed on the area without its consent, and residents have been vocally campaigning against it for years. They have made their opposition to the scheme clear in multiple ways, including in their responses to the review survey.

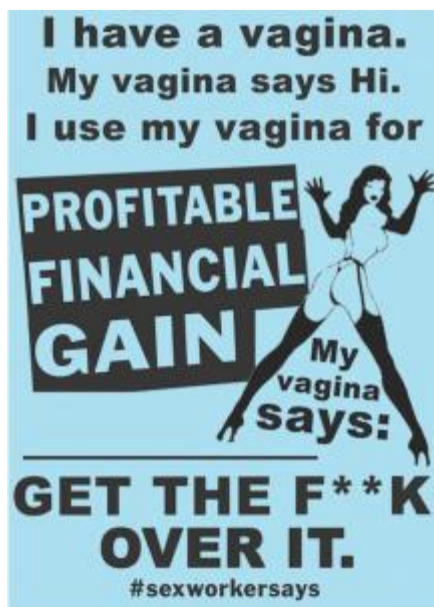
To suggest that they should share responsibility for it, is appalling. It is victim blaming. Would these academics, particularly the female ones and any who have children, want such a scheme in their own neighbourhoods? And if such a scheme were imposed against their will, would they want to share responsibility for it? Why the heck should they?

It is not an accident that the scheme was imposed on Holbeck, which is a mostly low-income neighbourhood. Do you think the well-heeled residents of Alwoodley and other similar affluent suburbs of North Leeds would put up with such a scheme on their doorstep? Of course, they wouldn't – and they would have the resources to ensure it didn't happen. That's exactly why the scheme was put in Holbeck – because the council knew that the residents would not have the resources and connections to stop it. But even so, they have put up the most incredible, inspired and principled fight against it.

When I asked Jenny what she thought of this recommendation, she exploded, “They want us to take shared responsibility for organised crime!” She went on to tell me that most of the women have pimps – she said you can see them lurking nearby. And there are many Romanian women who are clearly human trafficking victims – and whose pimps/traffickers

are utterly ruthless. “How dare the reviewers suggest we share responsibility for this? How dare they?”

Later in the conversation she said that what the reviewers should have done is to really drill down into the women’s lives – to see what underlies their involvement, to see who gets drawn into the sex trade and why. That way, she said, we could begin to understand how to help them and how to work with children to help them avoid getting drawn in.



Currently Basis Yorkshire receives public funding to provide services to girls who are at risk of child sexual exploitation (CSE) in the area. Jenny said that made her so angry. How can an organisation that promotes prostitution as a normal job and campaigns for pimps to be decriminalised, be in a position to help vulnerable girls understand the very grave risks that the sex trade poses?

This image shows a postcard that was part of a range of similar postcards that until recently Basis Yorkshire sold on [Etsy](#). It gives a clear indication of where Basis Yorkshire are coming from.

Other glaring gaps

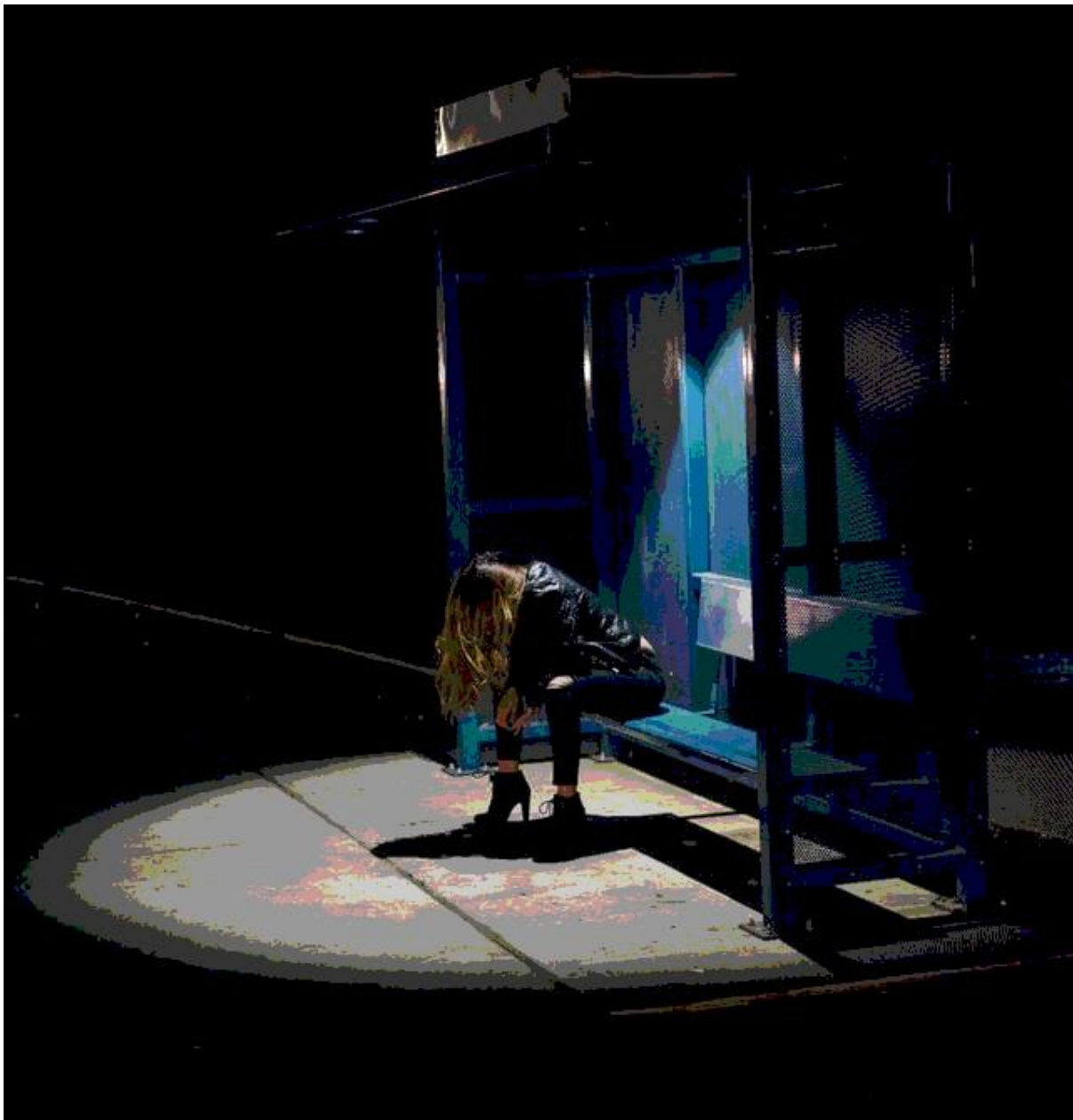
Why did the review not consider how the Managed Approach – and its intrinsic lackadaisical attitude to pimps and human trafficking – impacts on the pimping and human trafficking/modern slavery of young women in particular, and how this is a driver of prostitution in the area?

Why did they not consider the impact of this on the human rights of the young women who are pimped and trafficked in this heinous way?

Why did they not consider the impact on local citizens of nearly every day seeing women who are clearly being pimped and/or trafficked and not being able to help because of official tolerance of the practice?

Page 43 notes that “Drug and alcohol dependency were identified [...] to be one of the key drivers for engaging in on-street sex work and one of the main barriers to reducing its prevalence.” This is backed up by the many references to discarded ‘drug paraphernalia’ being a litter problem. However, there was no mention that drug addictions is a common way that pimps, who double as drug dealers, control women in prostitution, as explained by ‘[Anna](#)’ who was in street prostitution in Leeds in the 1990s.

Why did they not consider the kerb crawlers to be an intrinsic part of the on-street prostitution scene – without whom it would not exist? Why did they not consider them the core of the problem?



Many of the review's 'key findings' do not add up

The report lists a number of key findings that have been widely repeated in the mainstream media – for example, in the [Yorkshire Evening Post](#). However, if you dig a little deeper, you find that many of these claimed findings simply do not add up – leading to the inevitable conclusion that they are false. I give a few examples below – but there are more.

FALSE CLAIM: “The health and safety of on-street sex workers has been greatly improved by the MA.” (page 53)

The researchers interviewed 12 ‘on-street sex workers.’ This is a tiny proportion (less than 10%) of the estimated 140 women who were engaged in on-street prostitution in the area when the review started last summer– and there is no explanation of how many of these 12 women were involved in on-street prostitution in the area before the introduction of the zone and so it’s not clear what they were comparing it with.

Furthermore, the report contains no information about their demographic characteristics nor about how they were recruited. I understand that they were introduced to the researchers by Basis Yorkshire, which is funded to provide services to the women. This means that the women interviewed were likely to already have a good relationship with the services and may not have been representative of the wider population of women involved in street prostitution in the area.

“Most sex workers who were interviewed explicitly stated that they felt the Managed Approach has made them feel safer.”

But as mentioned earlier, feeling safer is not the same as **being safer** – and none of the women were reported as saying the MA had actually made them safer. Page 55 correctly notes that safety cannot be guaranteed in prostitution “due to the precarious nature of street-based sex work.” But it didn’t tease out the contradictions this exposes.

An increase in reporting of violence to the police is used to suggest that the women were safer – but again the data does not back this conclusion up.

Table 5.1 shows the reporting of violence to the police before and after the introduction of the Managed Approach. The increase in reporting is claimed to be a significant success. However, there is no indication whether the two periods being compared represent the same length of time. It’s been nearly six years since the MA was introduced. Does the ‘Before MA’ column represent the six years before it was introduced? There’s no way of telling because they don’t tell us. And without knowing, a comparison is meaningless.

Table 5.1. The increase in reporting of crimes by on-street sex workers before and since the MA

Incidents reported per annum	Before MA	Since MA
Violence with injury	20	46
Violence without injury	13	55

While on the face of it, the figures do suggest an increase in reporting, the numbers are very low – given that the right-hand column covers nearly six years. To suggest that this supports the claimed improvement in the women’s health and safety, is a huge stretch.

The increase in reporting of incidents to Ugly Mugs was also mentioned. However, no data was shown, and as Ugly Mugs was relatively new in the years before the MA was introduced, it is hard to see that any firm conclusions can reasonably be drawn from this either.

The 12 women interviewed did speak very positively about the improvement in the services that were available to them and in the attitudes of the police. Of course, these improvements are very welcome – but they could have been made without the other aspects of the MA – such as the tolerance of pimping and high levels of kerb crawling.

Page 58 makes it clear that in spite of the claims that the approach is not reliant on ‘enforcement,’ enforcement action is still taken against the women, and can even land them in prison. However, there appears to be no enforcement against pimps and that taken against kerb crawlers consists simply in making them listen to a 90-minute presentation. So education for the men who drive the entire shebang and prison and cautions for the women who are its victims.

There is no clear evidence in the report that the MA has greatly improved the health and safety of on-street sex workers as it claims. So this grandiose claim is false and misleading.

FALSE CLAIM: “Evidence indicates that the MA has reduced the prevalence of on-street sex workers in Leeds.” (Page 42)

This claim in huge typeface is clearly contradicted by a statement further down the same page but in much smaller typeface:

“...evidence supporting a reduction in the number of on-street sex workers due to the MA is [...] lacking.”

This is followed by a claim that 21 women have exited on-street prostitution in the last year, which is obviously very welcome – except later the report says that exiting may not mean that the woman has found a genuine route out of prostitution. So, it is unclear what this really means. Does it mean they moved to indoors prostitution or does it mean they left for a while but unfortunately weren’t able to sustain it (which, unfortunately, we know is all too common), or does it mean they really have escaped the life of prostitution?

It certainly isn’t evidence of overwhelming success considering the scheme has involved hundreds of women over six years.

The residents who responded were clear that the scheme has **not** reduced the prevalence of on-street prostitution in the area or of the problems associated with it. 146 local residents completed the survey. Figure 7.4 summarises the general responses. Here is an excerpt showing the responses to questions relevant to this claim.

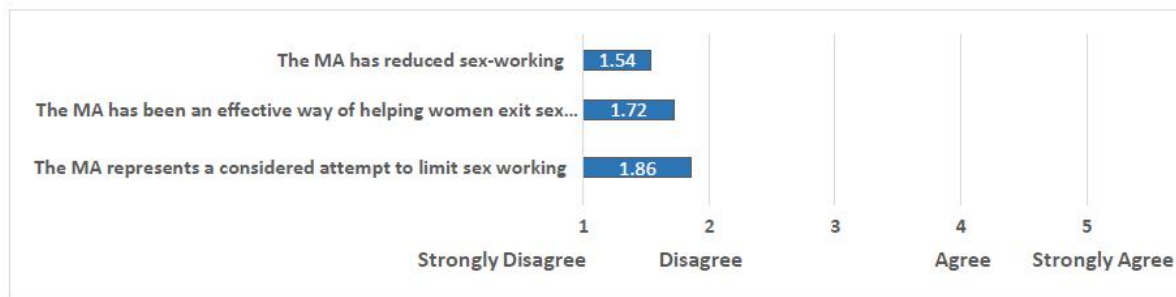


Table 7.1 summarises residents’ perceptions of the previous six months. This was similarly negative. Here is the relevant section of the table:

Statements capturing the perceptions of residents’	Agree	Unsure	Disagree
I have witnessed an increase in street-based sex work in residential areas	55.1%	23.7%	21.2%
I have witnessed an increase in street-based sex work taking place between 6am -8pm	56.8%	20.3%	22.9%
I have witnessed a decrease in street-based sex work taking place outside of local businesses	14.4%	33.9%	51.7%

N=118

So again, a grandiose claim of the success of the MA with absolutely nothing more than straws to back it up.

FALSE CLAIM: “Evidence suggests that the impact of on-street sex working on residents has reduced.” (Page 42)

There is now a dedicated police phone line for residents to report problems relating to street-based prostitution in the area. The report bases its justification for claiming that the impact on residents has reduced largely on the fact that an increasing percentage of calls to the dedicated line are about unrelated issues, and the greatest number of calls were in the summer months of 2019. However, the report also states the obvious that problems are usually greater in the summer months when the days are longer and people are likely to be out and about more in the evening.

It then goes on to state the following *non sequitur*:

“In sum, all LCC, WYP, and Elected Members stated that that since 2019 the MA had significantly reduced the impact of sex work on the residents and businesses of Holbeck.”

Prior to 2019, residents had bombarded the police, officials and council members with complaints about the zone, but this had significantly reduced since 2019. However, this does not mean that the problems no longer exist. 2019 coincided with the full implementation of the dedicated phone line and the commissioning of the ‘independent review.’

Now that residents had alternative ways of reporting complaints and the hope that the review would uncover the problems, it is hardly surprising that they contacted officials and representatives less frequently – especially considering that doing so had done little to bring about change over many years. Everyone gets tired of being fobbed off.

Surely the residents are the ones we should be listening to about the impact on their own lives? And the message they gave to the survey is clear that the negative impact on their lives continues unabated, as Figure 7.4 and Table 7.1 show.

Figure 7.4 – Resident respondents’ opinions on the Managed Approach to street sex work

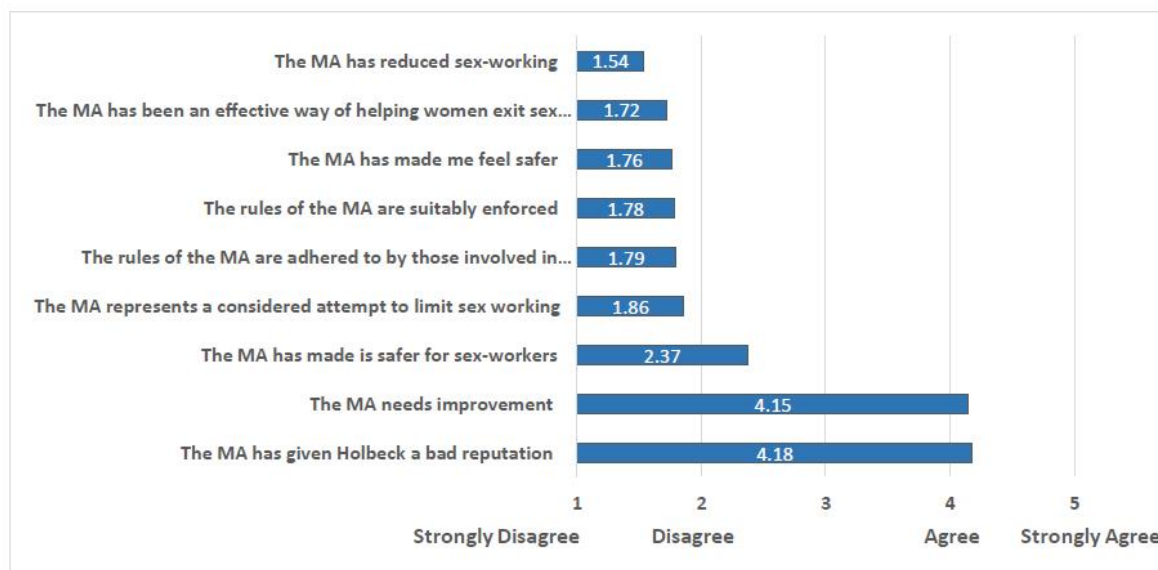


Table 7.1. Residents’ perceptions of the last 6 months

Statements capturing the perceptions of residents’	Agree	Unsure	Disagree
I have witnessed an increase in street-based sex work in residential areas	55.1%	23.7%	21.2%
I have witnessed an increase in street-based sex work taking place between 6am -8pm	56.8%	20.3%	22.9%
I have witnessed a decrease in street-based sex work taking place outside of local businesses	14.4%	33.9%	51.7%
I have witnessed an increase in drug use in my area	55.1%	24.6%	20.3%
I have witnessed less sexual acts and acts of indecency in public	14.4%	28.0%	57.6%
I have witnessed an increase in anti-social behaviour related to street-based sex work	48.3%	26.3%	25.4%
I have witnessed an increase in police presence	22.9%	20.3%	56.8%
I have seen an improvement in the cleanliness of the area	16.1%	22.0%	61.9%
I have seen an improvement in the response to reports I have made to the police regarding sex work related complaints	11.9%	52.5%	35.6%
I have witnessed a decrease in the frequency of female residents being propositioned for sex	9.3%	31.4%	59.3%
I have seen an increase in drug use paraphernalia	52.5%	25.4%	22.0%

N=118

It seems an extraordinary arrogance to conduct an ‘independent survey,’ one of whose aims is to gauge the impact on local residents and then to ignore and deny what those residents actually say.

So again, a grandiose claim of the success of the MA with practically nothing to back it up and much to contradict it.

FALSE CLAIM: “A systematic review of the research literature and conducting of a survey of police forces in England and Wales, did not identify any more effective interventions or ways of reducing the problems associated with on-street sex work within the parameters of existing UK law.” (Page 11)

This claim is misleading, and perhaps even dishonest – and yet it is being trumpeted in the press as if it is a fact.

The Managed Approach does little, if anything, to deter punters (on foot or in cars) without whom on-street prostitution would not exist. It is hard to understand how anyone could think it would be possible to reduce on-street prostitution in the current climate of inequality where large numbers of women are in dire financial circumstances, and while men generally have a much greater disposable income, without addressing men’s demand for prostitution, and without making systematic efforts to help women find genuine alternative sources of income.

The current law in England and Wales does have provision for clamping down on kerb crawlers but the people behind the Managed Approach made a strategic decision to not enforce it. To claim that they are doing everything possible within the current law to reduce the problems associated with on-street prostitution is disingenuous. Kerb crawling is one of the major problems but they decided to do nothing to stop it.

The report also claims that the Managed Approach has influenced the NPCC (national police) guidelines – which is certainly believable considering that they also flout not only the PSED but also binding obligations under international law, as we explain in our report: [A Sexist Prism: National Police Guidance on Policing Prostitution](#).

After a punter brutally murdered five young women involved in on-street prostitution in 2006, [Ipswich](#) came up with a three-pronged strategy, very similar to the approach known as the [Nordic Model](#). Firstly, they stopped arresting the women and instead provided them with substantial help to exit prostitution and rebuild their lives. Secondly, they used the kerb crawling legislation and number plate recognition technology to crack down on kerb crawlers. And thirdly, they worked with children at risk of being groomed into the sex trade to prevent them also ending up exploited on the streets.

An independent [study](#) found the approach enabled the vast majority of the women to leave prostitution permanently and had eliminated kerb crawling in the town. The researchers also found that the approach had more than paid for itself – because of lower criminal justice and social support costs.

The bias of the researchers is evident in their misrepresentation of the Ipswich approach and how easily they wrote it off as irrelevant – while simultaneously, inaccurately and bizarrely claiming it was similar to the Managed Approach.

Conclusion

Apart from the positives noted above, the report highlighted two other very positive things.

Firstly, the incredible strength of the local community and their empathetic concern for the women who are involved in street prostitution in the area. As street prostitution causes the community so many problems, it wouldn't be surprising if they turned on the women. But by and large they haven't. They have developed a sophisticated political and feminist understanding that prostitution is a systemic problem that is much bigger than the individual women who are caught up in it. (You can read their response to the 'independent review' [here](#).)

Secondly, the local street cleaning service stepped up in an admirable way to remove the condoms, drug paraphernalia and other debris from the area. Part of this success must also be attributed to the local community who used their popular Facebook page to keep the cleaning team abreast of issues.

The report claims the cost of the scheme is £200,000 a year. I find it implausible that this could cover the cost of four dedicated police officers, a police data expert, the dedicated phone line, the significant extra street cleaning costs, installing and running the CCTV cameras, and the funding of the support and drug rehabilitation schemes. But regardless, a lot of public money and resources are going to maintain a system that involves so much damage to individuals and the community, and so much organised crime and vile exploitation of human suffering.

Would it not be better spent in following Ipswich's lead – using the CCTV cameras and number-plate recognition software to rigorously enforce the kerb crawling legislation, cracking down on the pimps and human traffickers, and investing in high-quality holistic and individualised services for the women – to really help them kick their drug habits and rebuild their lives away from prostitution?

The report makes dismal and distressing reading. One can't help thinking that the reviewers were captured by partisan forces who were keen for a particular result and who would stop at pretty much nothing to get that result. If this is true, however, it may have been an own goal,

because no one with even a smidgeon of nous could read that report and believe it had any value outside the recycling bin.

Further reading

- [The Holbeck red light zone: condoms, sex offenders and cars full of jeering men](#)
 - [Who says decriminalised red-light districts are safer for women?](#)
 - [How a Nordic Model approach to tackling prostitution was implemented in Ipswich](#)
 - [A Sexist Prism: National Police Guidance on Policing Prostitution](#)
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[*] An appendix purports to set out the current law as it relates to prostitution in England and Wales – but it ignores the most recent changes to the Sexual Offences Act 2003 – which in one place it refers to as the Sexual Offences Act 2009 – and doesn't mention the Modern Slavery Act 2015.