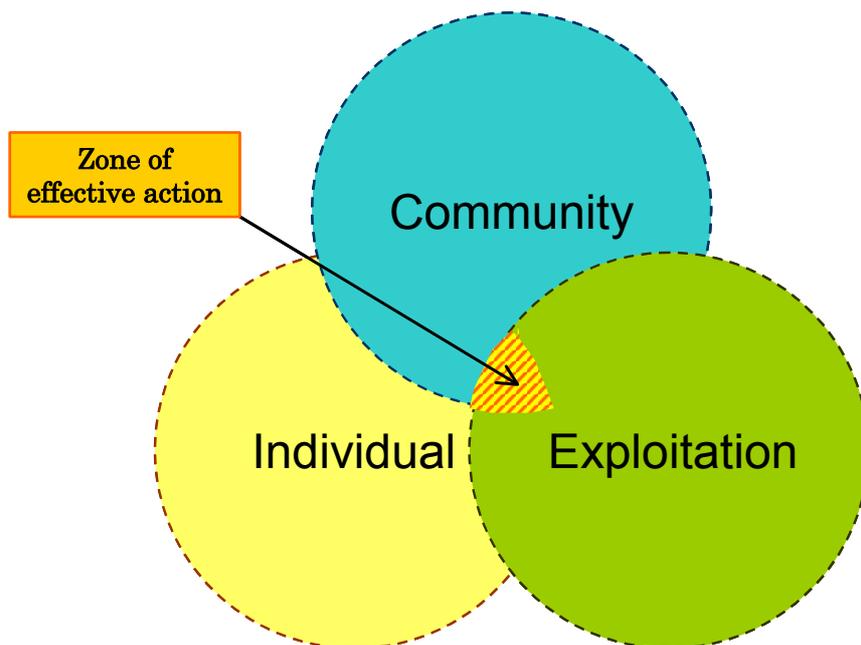


Policing Prostitution:

ACPO's Policy, Strategy and Operational
Guidelines for dealing with exploitation and
abuse through prostitution



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Editorial Team:

Timothy Brain QPM
DI Tony Davis
Anna Phillips

Foreword	3
1. Introduction	5
2. Prostitution as a ‘market crime’	9
Individuals’ motivation	10
Monitoring of Activity	12
The links between drug and sex markets	14
Organisation of drug markets.....	14
Comparison of drug usage among sex workers.....	15
Reasons to address these problems	15
Links between organised crime and prostitution	16
Human Trafficking	17
Why is organised crime involved?.....	18
3. The Role of Chief Constables	19
4. Summary of Principles	21
5. Statement of Policy	22
6. Strategic Aims	23
7. Implementation	24
Consolidated Action: Individual, Community, Exploitation	24
Method.....	25
Individuals.....	25
These aims will be achieved by:.....	26
Community	27
These aims will be achieved by:.....	28
Exploitation	29
These aims will be achieved by:.....	31
Crime and Disorder audits	33
Step-by-step NIM approach.....	34
8. Summary	35
9. References & further reading	36

Foreword

The policing of prostitution currently operates in a national policy vacuum. This is understandable, although no longer excusable. It is understandable because society as a whole has an equivocal attitude towards prostitution and prostitutes. Some regard it as a moral rather than criminal issue, some as a crime of abuse and exploitation, others as an issue of social care and welfare, and some may even regard it simply as a career choice.

At the time of presenting this ACPO national strategy the Home Office has initiated a substantial review of the law and social policy relating to prostitution. This is timely and welcome but some of the practical policing changes necessary to address the changes that have occurred and are occurring in prostitution related crime need to take place in the short, as well as the longer term. It is the purpose of this policy and strategy to fill the national strategic vacuum and assist forces in making the difficult operational choices necessary in a world of competing priorities.

The fact that there needs to be a national strategy at all is demonstrated by the substantial changes that have occurred in prostitution-related crime in recent years. There are many factors at play, which can be summarised under two main headings. The first is the rise in street prostitution associated with addiction to illegal drugs, often heroin and crack cocaine. This not only motivates those already engaged in prostitution, but also often acts as an incentive to women and men to become prostitutes in the vain search for easy money. The second is the increase in off street prostitution linked to organised crime – a lucrative business for those in charge. Prostitution is increasingly linked to people trafficking, principally in importing women into this country to work in brothels which masquerade as massage parlours and saunas. These women often work in conditions akin to slavery, on subsistence wages and in fear of reprisals should they seek to break free from this regime.

Historically the risks run by those who exploit women, men and sometimes even children were low. Penalties increased under the Sexual Offences Act 2003 have not yet had an impact. Although there are examples of successful police operations and exemplary court sentences, the profits made through such sexual exploitation are large; put simply, the incentives outweigh the risks.

This policy and strategy emphatically recognises that prostitution is a victim-centred crime, and that those abused and exploited through it need help to leave it behind and start new lives. It also, however,

recognises that communities as well as individuals can be victimised and need help too. At the same time those who abuse and exploit must be rigorously investigated and prosecuted. This strategy, therefore, promotes an holistic approach to the policing of prostitution which keeps in balance the three elements of **individual, community**, and the investigation and prosecution of those who **exploit** and abuse. It is not possible to effectively choose between these three facets of effective policing; they must operate simultaneously and sustainably. In adopting this approach the strategy builds on the successful experience of the ACPO Child Prostitution Policy launched in 1998.

In addition to recommending the victim-centred, holistic approach, this policy and strategy also recommends an approach based throughout on partnership with local authorities, other statutory agencies and non-governmental organisations. It takes account of the National Threat Assessment and the link to drugs and organised crime. Again to put the matter simply, the policing of prostitution will at best only achieve short-term results unless there is effective partnership at the local and strategic level to support victimised individuals and communities with appropriate legislation and enforcement resources.

In presenting the strategy now, ACPO complements Home Office initiatives to promote holistic solutions. It also fully supports the Home Office in its intention to increase the penalties and risks to those who abuse and exploit vulnerable women, men and children.

In completing this strategy I am grateful to all those who have contributed ideas and examples of successful schemes nationally. Colleagues from police forces, other statutory agencies, non-governmental organisations and centres of academic excellence represented at the annual ACPO National Vice conference have contributed with their expertise both directly and indirectly. I am also grateful to those who have critiqued this document, although they may not necessarily agree with the final text. I am specifically grateful to Detective Inspector Tony Davis and Anna Phillips of the Gloucestershire Constabulary for their assistance in the compilation and completion of this policy and strategy.

Timothy Brain

Chief Constable and ACPO National Spokesperson

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1. Introduction

Prostitution is often seen, erroneously, as a victimless crime. Indeed, by some it is argued that it is not a crime at all, but simply an exercise in freedom of choice. Some forms of adult prostitution in private *are* lawful and fully consensual, and this strategy does not seek to proscribe these forms. However, the concept that *all* prostitution is a matter of choice is emphatically rejected. This strategy recognises that many modes of prostitution are crimes with definite victims – individuals, communities and whole societies. It does not take a narrow view of the definition of either victim or crime, but it does put victims, in whatever form, at its centre.

The most obvious, but generally the most neglected, victim is the prostitute. In most cases in England and Wales today this will be an adult woman, but may also be a man or a child. Prostitutes may be exploited, abused and physically and mentally harmed. Too often individual damage has been seen as an “occupational hazard”, but such an attitude can have no place in modern Britain, and especially not in any police strategy seeking to address the problems caused by prostitution.

Communities too can become victimised. Communities where street prostitution flourishes often marginalised as “red light” districts. Other forms of crime, such as drug abuse, drug dealing and robbery can take root, while the environment is degraded with discarded needles, used condoms, other forms of litter, and prostitute cards in public telephone boxes. Women not involved in prostitution can be harassed by kerb-crawlers, and children placed in moral danger. In summary, it can become a “signal crime” for the community.

Prostitution has traditionally for a variety of reasons, been a low priority for the police. Prostitution by its nature has existed at the margins of communities, often in a geographical as well as a social sense. In national political terms it is a difficult topic to draw policy and legislation around, because it is not only seen as an inevitable phenomenon, but also one which offends many because it degrades individuals through exploitation and abuse. Examples of other jurisdictions suggest alternative solutions, but on closer inspection these are illusory.

This fundamental ambiguity is reflected in both the National Policing Plan, which has no specific objectives or targets relating to prostitution, and in local plans. In an age obsessed with targets and measurements, prostitution is relatively unmeasurable and seems somehow less impactful than burglary, car crime and robbery, but there are links to

be made tangible and measurable Key Performance Indicators. The institution of a Home Office review of prostitution, *Paying the Price*, in July 2004 is a recognition of the growing need to tackle this crime at both the national and local level, and this policy and strategy complements many of the principles stated in that review¹. It also embraces and promotes the holistic approach to prostitution advocated in the Home Office publication *Tackling Street Prostitution*, also published in July 2004.²

This ACPO strategy recognises the adverse impact prostitution has on individuals and communities. It recognises that prostitution often has a pivotal position in stimulating or maintaining other, more measurable forms of local crime, such as robbery and drug dealing. It recognises the links it can have with level 2 and level 3 organised and cross-border crime, especially trafficking, protection, corruption and extortion. Above all this strategy recognises the physical and emotional damage prostitution can cause to vulnerable individuals.

This strategy takes no moral view on prostitution as an activity or phenomenon. However, it does accept the position of the United Nations convention 1949 on the Suppression of the Trafficking in Persons and the Exploitation of the Prostitution of Others. Similarly, this strategy accepts and incorporates the 2000 UN Protocol to prevent, suppress and punish trafficking in persons, especially women and children, supplementing the United Nations Convention against transnational organised crime.

The purposes of this UN Protocol (Article 2) are made clear in the statement of purpose:

- (a) To prevent and combat trafficking in persons, paying particular attention to women and children.
- (b) To protect and assist the victims of such trafficking with full respect for their human rights; and
- (c) To promote cooperation among States' Parties in order to meet those objectives.

The strategy recognises that Articles 2 (Right to life) and 4 (Prohibition of slavery and forced labour) under Schedule 1 of the European Convention on Human Rights and the Human Rights Act 1998 are key principles supported by this strategy.

¹ *Paying the Price: a consultation paper on prostitution July 2004*, Home Office Communication Directorate, July 2004

² *Tackling Street Prostitution: Towards an holistic approach*, Home Office Research Study, Communications and Development Unit, 2004

This strategy incorporates the earlier ACPO *Guidelines* and the joint Home Office/Department of Health Circular of 2000 (*Safeguarding Children Involved in Prostitution*) in respect of abuse of children through prostitution. **This victim-centred approach has proved effective and in many respects represents a model for the current strategic approach to dealing with all forms of prostitution.**

This strategy does not argue that prostitution will be a priority for everyone. It does, however, assert that all police forces and all Crime and Disorder Reduction Partnerships should assess the extent and community impact of prostitution in their areas. The techniques for doing so are apparent – the correct application of the National Intelligence Model, Crime and Disorder surveys and Crime and Disorder Reduction Strategies.

This must, however, be an active rather than a passive approach. Intelligence systems must be used to proactively assess the true extent of problems caused by prostitution. The covert nature of many aspects of prostitution related crimes, especially those relating to child prostitution, off-street prostitution and trafficking, will rarely reveal themselves through passive techniques.

There is a perception across the police service that prostitution is a growing problem. There is some evidence for this in national statistics. There is more evidence in local perceptions and community concerns. Political and social concern has inevitably led to a growing interest in the concept of introducing “zones of toleration” for the first time officially. This is understandable as many hope that such zones will reduce abuse and victimisation, and make the problem more manageable in terms of its impact on local communities. Continental and other international models are cited as examples of success to support such arguments.

Although sensitive to the arguments in favour of “zones of toleration”, ultimately this policy and strategy does not support their introduction. Clearly if there is a change in the law which permits their introduction, then as always the police service will enforce the legislation of the day. However, at this stage their introduction is not supported. The first reason is that a change in the law would be necessary for such zones to operate lawfully. Chief constables do not currently possess the discretion *as a matter of policy* to dispense with an act of Parliament. The second reason is that the evidence that such zones work successfully in other jurisdictions is equivocal. Not only do such zones permit the continued exploitation of people through prostitution, there

is evidence that illegal prostitution has been encouraged alongside the managed examples.³

In completing this policy and strategy accounts are taken of available studies of such examples, and the conclusion is that they are not unequivocal successes. Furthermore, there would need to be a change in the law before such zones could be introduced in England and Wales. There are, however, other partnership solutions available which will achieve many of the aims sought by the proponents of “zones”, without the attendant opportunities for increasing (inadvertently) prostitution and related crimes in such neighbourhoods.

This strategy will recommend to chief officers that holistic, partnership strategies are adopted and fermented at the local level, and that “crackdowns” which concentrate on only one aspect of the problem may deliver temporary respite but will not deliver sustainable solutions.

Police Forces in England and Wales are currently operating in a policy vacuum: the law regarding prostitution is clear, but the *application* of the law – in order to best serve the public and protect the vulnerable – is not. It is the purpose of this strategy to fill the policy vacuum, to raise the profile of the issues, and **to ensure that prostitution is effectively policed to a victim-centred national standard.**

Note: The Association of Chief Police Officers' remit relates to England, Wales and Northern Ireland. The Association of Chief Police Officers Scotland (ACPOS) is responsible for Scotland. However, in view of legal differences this policy and strategy relates to England and Wales only, although its principles and recommendations may be used in the other constituent countries of the United Kingdom, if desired, by those responsible for police policy.

³ Julie Bindel and Liz Kelly, *A Critical Examination of Responses to Prostitution in Four Countries: Victoria, Australia; Ireland; the Netherlands; and Sweden*, Child and Women Abuse Studies Unit, London Metropolitan University 2004

2. Prostitution as a ‘market crime’

Prostitution is in many of its aspects a “market crime”; in other words it obeys the laws of economic markets and the principles of supply and demand. Strategies that address only one aspect of the market are therefore unlikely to be successful in the long-term. This strategy seeks to investigate a range of activities which will create the environment and opportunities to achieve sustainable harm reduction.

Sex markets can take many forms, but broadly speaking can be defined as either “street” or “off street”. The markets tend to generate different levels of concern among local communities and law enforcement agencies. Where it exists, street sex working is intrinsically a high-visibility problem for local communities, whereas off-street sex markets tend to be hidden from view and therefore of lower public concern.

Type of sex market	Access to market	Associated crimes/issues
STREET	Meeting face-to-face on street Kerb crawling, usually in a red light district Prolific advertising cards in telephone boxes	Harassment of innocent bystanders Environmental harm “Signal” crimes Drug dealing Violence to vulnerable people Exposure of young children to moral danger Street Robbery
OFF-STREET	Visiting brothels or working flats Responding to small ads in local newspapers or magazines Calling escort agencies or visiting hostess clubs Visiting massage and sauna parlours Crack Houses	Hidden from public view, greater opportunity for exploitation Sexual slavery Trafficked women and children Coercion and control Money laundering Protection rackets Tax evasion Illegal firearms

Clearly, an holistic approach is needed in order to tackle the various forms of prostitution and its related problems effectively.

Individuals' motivation

An holistic approach must consider and understand the motivation of people involved in sex work. This is an unregulated industry which may yield incredibly high profits for operators. There is a customer demand for the services of prostitutes which stretches back thousands of years, and it is relatively easy to get involved in prostitution – no special skills or training required. These motivating factors apply in varying degrees to all those involved in prostitution (prostitutes themselves, as well as those who abuse and exploit).

Figure 3: Motivating factors



Need might include the perception that there are no other options available to obtain/maintain a lifestyle – ranging from a basic hand-to-mouth “survival strategy” existence, to creation of wealth.

Opportunity is a motivational factor as it can be relatively easy to become involved and stay involved in prostitution.

The potential **Rewards** for being involved in prostitution – in terms of power and money – are great, and such temptation may be difficult to resist.

Last but by no means least, **Demand** is a key driving factor in the development of the prostitution market. If demand to buy sex or similar services disappeared, the industry would either have to go to great lengths to create a demand (through advertising, etc.), or would dry up completely.

It is by tackling, simultaneously and sustainably, each of these motivating factors that the best opportunities exist for assisting victimised individuals and communities.

Although the average age for entering prostitution varies, some young people do so after being sexually “groomed”. The 1998 ACPO *Guidelines*⁴ provided alternatives to prosecution and exit routes for many young people. Its key principles may be summarised as:

- Children up to the age of 16 will be treated as likely to suffer “significant harm” within the meaning of the Children Act 1989
- Police officers will not issue children involved in prostitution with a caution (or reprimand or final warning) but remove them to a place of safety
- A partnership comprising all key local agencies (often through the auspices of the Area Child Protection Committee (ACPC)) will meet and determine an immediate action plan to protect the child from harm and progress the investigation of the circumstances surrounding their involvement in prostitution
- The police will commence an investigation to identify and prosecute those who have abused and exploited the child or children concerned
- The multi-agency forum will develop a strategy to ensure that the child or children remain removed from the circumstances that gave rise to their initial significant harm
- The multi-agency forum will develop its strategy to ensure that the child or children do not return prostitution. The strategy will normally involve mentoring, education, employment, housing, drug meditation, counselling and the development of a network of friends and relatives to provide continued support
- Children involved in prostitution will not be prosecuted unless there is unequivocal evidence of a persistent and voluntary return to the practice of *street prostitution*. (Children abused through prostitution but not practising street prostitution do not in any case commit offences)
- The adoption of appropriate terminology which centres on the children as “victims”, and those who abuse, exploit or coerce as “abusers, exploiters or coercers”

The keys to the relative success of the *Guidelines* has been its focus on

- Partnership
- Addressing causes, not symptoms
- Focusing exit and diversion strategies on the child-victims
- Focusing investigation and prosecution on those who abuse, exploit and coerce

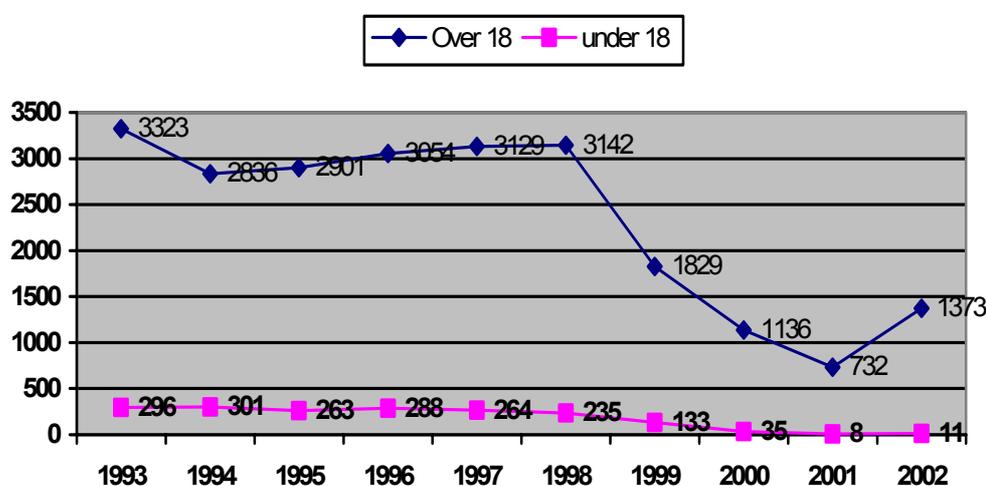
⁴ Brain et al, (1998) *Child Prostitution: a Report on the ACPO Guidelines and the pilot studies in Wolverhampton and Nottinghamshire*

Monitoring of Activity

Offences relating to prostitution in England and Wales are recorded and monitored by the Home Office, with offence types being broken down by force, gender and age group. Getting timely figures is challenging for the Police, Courts and the Home Office.

At the time of writing, the most recent data available relates to the calendar year 2002. The delay in the availability of statistics is in itself a problem, inhibiting effective strategic analysis. It also, possibly, reflects the priority attached to the problem at a national level. Some key findings of the 2002 annual report are shown below:

Figure 1: Police Cautions for Street Prostitution, 1993 – 2002, females



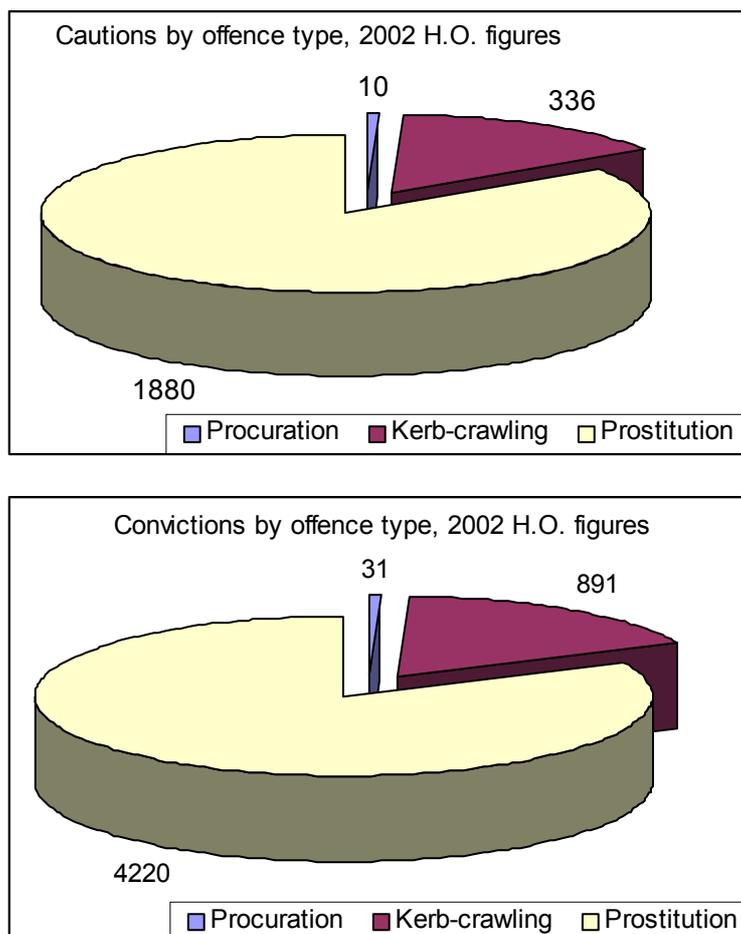
As with female street prostitution, there has been an overall decrease in male prostitutes cautioned, prosecuted or convicted since 1997.

Table 1: Breakdown of all males Cautioned, Prosecuted at Magistrates' Courts and Convicted at all courts for Street Prostitution, 1997-2002⁵

Year	Cautioned			Prosecuted			Convicted		
	Under 18	Over 18	Total	Under 18	Over 18	Total	Under 18	Over 18	Total
1997	0	1	1	5	200	205	4	182	186
1998	0	5	5	2	119	121	1	104	105
1999	0	5	5	1	92	93	1	82	83
2000	0	3	3	2	78	80	0	68	68
2001	0	5	5	0	64	64	0	60	60
2002	1	0	1	0	58	58	0	54	5

⁵ Source: Home Office unpublished statistics 2002

Figure 2: Breakdown of Cautions and Convictions for Prostitution-related offences, 2002



The overall trends are very clear:

- The ACPO Guidelines and joint circular on child abuse through prostitution have resulted in the effective elimination of prosecution for children under the age of 18.
- Over the same period since 1998 cautions and prosecutions for over 18s has decreased, suggesting that the ACPO Guidelines have had an unintended consequence in reducing police action against adult street prostitutes.
- Over the same period there has been a shift of emphasis from cautioning and prosecuting females, to males involved in kerb-crawling, with numbers increasing.
- Prosecutions of those involved in the exploitation and abuse of women through prostitution are a numerically negligible part of the enforcement effort, and in such numbers cannot act as a sufficient deterrent to those who abuse and exploit.
- There is insufficient evidence of sufficient successful interventions made against those who exploit and abuse children.

The links between drug and sex markets

“If you wanted crack you used to have to make a phone call. You don’t even have to move off the street corner now, they drive past you and throw it out of the window...”⁶

The co-existence of the sex and drug markets is well documented, although an actual causal link is hard to prove. Melrose *et al* (1999) found that drug use was more likely to have preceded prostitution than vice versa. It follows that, once involved in drugs, the criminal society and impaired lucidity they bring, working an occasional “trick” to pay for the habit may appear to be an easy option.

A particular concern is that nationwide crime figures show that the use of crack cocaine appears to be on the rise. Crack is a palliative for the risks and pressures inherent in sex work and, in contrast to opiate use, the short-acting nature of the drug encourages binge use. Furthermore, sex workers can easily raise sufficient cash to binge and they can also bring additional custom to the market, for instance through introducing clients to the drug or to their dealer, at the same time as selling sex.

Drugs and sex are sold in varying types of markets, and the way in which the buyer locates the seller tends to define the geography of the market (May *et al* 1999).

Organisation of drug markets

Open drug market
These tend to operate in geographically well-defined areas at defined times and there are no barriers to access; someone completely unknown to sellers would be able to buy drugs in an open market.
Closed drug market
These can be pre-arranged meetings on the street or at off-street premises. Access is limited to known and trusted participants. An unknown buyer needs someone to introduce them or to vouch for them before they can make a purchase.
Semi-open drug market
These are pub or club-based markets where unknown buyers will be able to purchase drugs, ‘if they look the part’

continued over

⁶ May, Edmunds & Hough (1999)

Crack house

This describes a range of properties from which drugs are sold. They can be residential, uninhabited or semi-derelict. They are often occupied for a short period until enforcement intervenes. In some cases the crack dealer may have forced the rightful tenant to use the house. These can also be used as centres for obtaining stolen goods or firearms. Users may be able to stay for extended periods using drugs and obtaining other services such as commercial sex. Sex workers may introduce new buyers to the crack house.

Source: May et al, 2000; Home Office, 2004

A key area of linkage is between drug and *street* sex markets. Problematic drug misuse is common among street sex workers and they will make significant customers for drug dealers. They may also buy for clients, act as a bridge between clients and drug sellers and can be managed by drug dealers.

Comparison of drug usage among sex workers

93% (90/115) of street sex workers had used an illegal drug in past six months compared to 69% (86/125) of indoor workers.

49% of street sex workers had injected in past month compared to 3% of indoor workers.

78% of street sex workers had **used heroin** compared to 5% of indoor workers.

32% of street sex workers had **used crack cocaine** compared to 4% of indoor workers.

63% of street sex workers reported their main **reason for prostitution** was to **pay for drugs** compared to 1% of indoor workers

Source: (Church et al., 2001)

Reasons to address these problems

The complexity of the relationship between drug use and prostitution means that there are numerous valid reasons for attacking this problem on as many levels as possible. These reasons include:

- Preventing the involvement of vulnerable groups in prostitution and drug misuse
- Preventing anti social behaviour
- Preventing vigilante actions of local communities
- Responding effectively to needs and wishes of communities

- Disrupting the drug trade
- Minimising the potential wider impact of prostitution and drugs on society – increased levels of acquisitive crime, deterioration of health, mounting pressure on local resources/services, perpetuating cycles of poverty and abuse
- Putting a stop to the “collateral damage” suffered by communities within which drug markets are located – the downward spiral of crime, fear of crime, and disinvestments which these markets can precipitate⁷
- Reducing the social and mental damage which drugs cause to individual sex workers, including problems with physical and psychological health, self-esteem and overall ability to contribute to society
- Reducing the level and amount of violence, inherent in the illegal drug trade, experienced by sex workers, drug users, innocent bystanders and others in affected communities
- Reducing the perception that sex workers are legitimate targets for physical attack

Links between organised crime and prostitution

Organised crime is defined by NCIS as “ Those involved normally working with others in continuing serious criminal activities for substantial profit, whether based in the UK or elsewhere” in the Government White Paper “ One Step Ahead ”. Criminal organisations may be driven by motives of profit or political ideology, and in order to prosper, some degree of support must be provided by the society in which they operate. Prostitution-related organised crime in the UK operates at both levels 2 and 3 of the NIM, but it is normally only obvious at level 1.

Prostitution has traditionally been a component of the business carried out by criminal organisations. Along with dealing in drugs and firearms, extortion, “protection” and illegal gambling, the sale of sex on a large scale is potentially extremely lucrative to semi-legitimate businesses and criminal organisations that align their trade according to customers’ demands.

However, unlike firearm- or drug-related crimes, organised prostitution is a relatively underdeveloped police area of concern. It is an area which has gone unnoticed for a long time in police performance targets, and as a result, may be seen as an easy way to make money by the

⁷ Quoted from May Edmunds & Hough (1999)

organised criminals. **This, therefore, offers an opportunity for police forces to attack organised crime: any complacency on the part of the criminals is an opportunity for police forces to bring about their downfall; targeting their weakest defences and using the resulting intelligence to bring down entire organisations.**

The potential lines of investigation include financial inquiry, immigration and taxation offences, and the use of Covert Human Intelligence Sources (CHIS). The Regulation of Investigatory Procedures Act (RIPA) and the Proceeds of Crime Act (POCA) provide valuable legal tools through which to attack organised criminality associated with prostitution.

Human Trafficking

The problem of transnational organised crime is a real one that demands more careful investigation and greater resources than have so far been devoted to dealing with it. The following article, taken from www.interpol.int, outlines some of the problems associated with trafficking for sexual exploitation:

“The trafficking of women for sexual exploitation is an international, organized, criminal phenomenon that has grave consequences for the safety, welfare and human rights of its victims, and can totally destroy victims’ lives.

“Countries are affected in various ways. Some see their young women being lured to leave their home country and ending up in the sex industry abroad. Other countries act mainly as transit countries, while several other receive foreign women who become victims of sexual exploitation...”

“Interpol derives its actions from such conventions as the United Nations Convention against Transnational Organized Crime, and the additional Protocol to Prevent, Suppress and Punish Trafficking in Persons.”

For more details, please see:

<http://www.interpol.int/Public/THB/default.asp>

The National Criminal Intelligence Service (NCIS) regularly publishes a UK threat assessment; this can be found on www.ncis.gov.uk

“Illegal immigration”, “asylum seeking”, “human smuggling” and “human trafficking” are all terms that are used and sometimes confused when dealing with issues surrounding foreign nationals entering the UK. It is easy for a rich and affluent society to take for granted the standards of living that are regarded as normal everyday life, but which actually represent an extremely luxurious and wealthy lifestyle to persons whose own quality of life is subject to poverty, conflict, disease, family abuse, cultural displacements and a lack of jobs and education. The UK is seen as a very attractive place with opportunity to improve the quality of

life for such individuals whose desperation makes them vulnerable to exploitation. It is also a very attractive place for others whose only motive is to commit crime.

Trafficking is interpreted differently in different countries. This strategy identifies **People Smuggling** as “the illegal movement of people between countries whose intention is to avoid immigration regulations to find work or join family”, and **Trafficking** as “the illegal movement of people between countries, who are exploited”.

Exploitation includes exploitation by the prostitution of others, other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. A child is under 18 years of age and it does not matter if coercion, abduction, etc. were not used – the movement of a child for exploitation is trafficking. See Appendix A

The scale of People Smuggling is, by its nature, unknown, but it can be estimated to be substantial; this strategy deals only with those people who are **trafficked for sexual exploitation**.

Why is organised crime involved?

Organised crime is involved because the human commodity is inexhaustible and is not inherently illicit. International law is not set up to tackle it. The risk has increased with the introduction of the Sexual Offences Act 2003 and its increased penalties for trafficking although some prosecutions are in the pipeline, to date there have been no convictions under the new act.

Humanitarian support and complacency can provide a shield for criminal activity; increased enforcement can push migrants into the hands of criminals whose skills as traffickers are easily transferable. This is a profitable business.

Victims of gangs who operate prostitutes will, naturally, be fearful of brutal retaliation by the organisation should they break away from their exploiters. This fear is the lifeblood of the criminal organisation, and police forces must do whatever they can to reduce or eliminate it, to encourage victims to come forward to give evidence that would secure a conviction and bring these brutal organisations to justice.

3. The Role of Chief Constables

This strategy is intended to support the work of chief constables in the discharge of their duties, not dictate it. Choices have to be made; chief constables, having a statutory responsibility for the direction and control of their forces, are required to make those decisions. This strategy is intended to help them make those strategic choices in so far as the scale of a prostitution-related problem in their area affects them.

In discharging their responsibilities they must take account of the National Policing Plan and the local policing plan, set in conjunction with their police authority. Similarly, under the Crime and Disorder Act 1998, they enter into statutory crime and disorder reduction partnerships with various specified agencies and organisations in their areas, notably local authorities, which have reciprocal responsibilities.

All forces in England and Wales have accepted and implemented the National Intelligence Model (NIM). Within these parameters chief constables are responsible for the priorities they attach and the resources they deploy to address problems. This strategy is intended to assist them and their partners in identifying the extent of a problem in their area and then adopting appropriate local strategies, tactics and techniques to minimise the harm prostitution can cause.

Regarding specific duties of chief constables, Lord Denning identified the authority of the Commissioner of the Metropolitan Police and police in general. In the case of **R v Metropolitan Police Commissioner ex parte Blackburn** (1968) he stated:

“I hold it to be the duty of the Commissioner of Police, as it is of every Chief Constable, to enforce the law of the land. He must take steps so to post his men that crimes may be detected; and that honest citizens may go about their affairs in peace. He must decide whether or not suspected persons are to be prosecuted; and, if need be, bring the prosecution or see that it is brought; but in all things he is not the servant of anyone, save the law itself.

“Although the chief officers of police are answerable to the law, there are many fields in which they have a discretion with which the law will not interfere. for instance, it is for the Commissioner of Police or the chief constable, as the case may be, to decide in any particular case whether enquiries should be pursued, or whether an arrest should be made, or a prosecution brought. It must be for him to decide on the disposition of his force and the concentration of his resources on any particular crime or area. No court can or should give him direction in that matter.

“He can also make policy decisions and give effect to them, as for instance was often done when prosecutions were not brought for attempted suicide; but there are some policy decisions in which I think the courts in a case can, if necessary interfere. Suppose a chief constable were to issue a directive to his

men that no person should be prosecuted for stealing any goods less than £100 in value. I should have thought that the court would countermand it. He would be failing in his duty to enforce the law.”

In essence, chief constables have the discretion to determine the resources they apply to problems of crime and disorder; they have the discretion to determine policies with respect to the prosecution and cautioning of offenders. They do not have the discretion, as a matter of policy, to dispense with enforcement of a particular law in their area.

There can, therefore, be no lawful basis for so-called “zones of toleration” in England and Wales. In any case the evidence for their success in other jurisdictions is far from conclusive. Most arguments in favour of such zones are based on a zone being somewhere other than in the locality of their proponents. Furthermore, such zones perpetuate the marginalisation of prostitutes and allow for their continued victimisation. Furthermore, evidence in a recent study, suggests that illegal forms of prostitution not only survive but also can thrive alongside toleration zones. In any case, for zones to become lawful there would need to be a specific change in primary legislation.

Forces, however, are encouraged, where appropriate to create “priority action zones”. These are areas in which on- and/or off-street prostitution takes place, and where it has become a “signal crime” for the community. These zones are where:

- Partnership resources are concentrated
- A series of progressive interventions are implemented to assist individual prostitutes to leave prostitution
- Prostitutes are given welfare and health support
- Environmental resources are implemented to reduce the harmful effects on communities
- Those who abuse, coerce and exploit are identified, investigated and prosecuted

On the other hand, the decision for a chief constable to establish and use a vice squad is one for the chief constable alone. Similarly, the priority and resources attached to the policing of prostitution is for the chief constable’s discretion, but one exercised after following a strategic assessment under the National Intelligence Model. The chief constable must base the decision upon the scale of the problem, and balance that against the desired outcomes, and the impact of the problem on its victims (individuals and communities).

The primary tool which chief constables can use to assess the scale of prostitution related problems in their area and the appropriate response is the National Intelligence Model Strategic Assessment.

4. Summary of Principles

From the analysis and overview above, a set of key principles is established upon which to base the ACPO strategy. These may be summarised as:

- Prostitution is a victim-centred crime, not a victimless crime
- Individuals and communities can be victimised
- Prostitution is a market crime which follows market principles
- It can only be successfully tackled in partnership with other key agencies, organisations and individuals
- It can only be tackled by addressing each motivating factor
- “Zones of toleration” are currently an unproven alternative and of doubtful legality in England and Wales
- Enforcement alone is an inadequate solution
- This strategy supports partner organisations which seek to divert individuals from entering prostitution or which assist their exit from prostitution
- The strategy supports health and education initiatives, especially those which diminish or eliminate dependence on illegal drugs and which promote more mainstream lifestyles and careers
- The strategy promotes the use of appropriate terminology
- This strategy applies equally to men, women and children of all races, nationalities and religions

5. Statement of Policy

Prostitution is not illegal, but certain activities associated with prostitution that harm individuals and communities are. This policy and the associated strategy does not therefore seek to eradicate prostitution in all its forms, but it does seek to support communities and partner organisations in limiting its most harmful affects.

It is the policy of ACPO to protect individuals and communities from the harm that illegal forms of prostitution can cause, through the targeted application of relevant laws and policies, and by working in partnership with other statutory and voluntary organisations and individuals.

The Association will ensure that its policy:

- Complies with international treaty obligations
- Recognises the rights of individual victims and communities to protection, equitable law enforcement and harm reduction
- Promotes the use of accurate, victim-centred and non-pejorative terminology
- Is applicable to all who are abused or exploited through prostitution, regardless of race, gender or age.

6. Strategic Aims

The aims of this ACPO Policing Prostitution Strategy are to:

1. **Protect individuals and communities from harm** and exploitation caused by prostitution (NIM level 1)
2. **Investigate and disrupt organised criminal activity** (NIM levels 2 and 3) associated with prostitution
3. **Support or create effective partnerships** with other agencies, organisations or individuals which help minimise or eliminate the harm caused through prostitution to individuals or communities
4. **Undertake or support research** which furthers the ends of this strategy
5. **Support national policymakers** and lawmakers in creating policies and laws which make it easier to investigate and successfully prosecute those who abuse, exploit and coerce victims through prostitution, and which support the diversion or exit from prostitution by individual victims

It is the underlying principle of this strategy that its objectives will only be achieved through working in partnership with other agencies, organisations and individuals. These partnerships include those formal Crime and Disorder Reduction partnerships formed under Section 17 of the Crime and Disorder Act 1998.

ACPO will continue to support the development and spread of good practice through the annual **ACPO National Vice Conference**, and encourages forces to send representatives. It will continue to publish an annual national **Directory of Counter-Vice Agencies** to facilitate intra-force and intra-agency coordination and cooperation.

7. Implementation

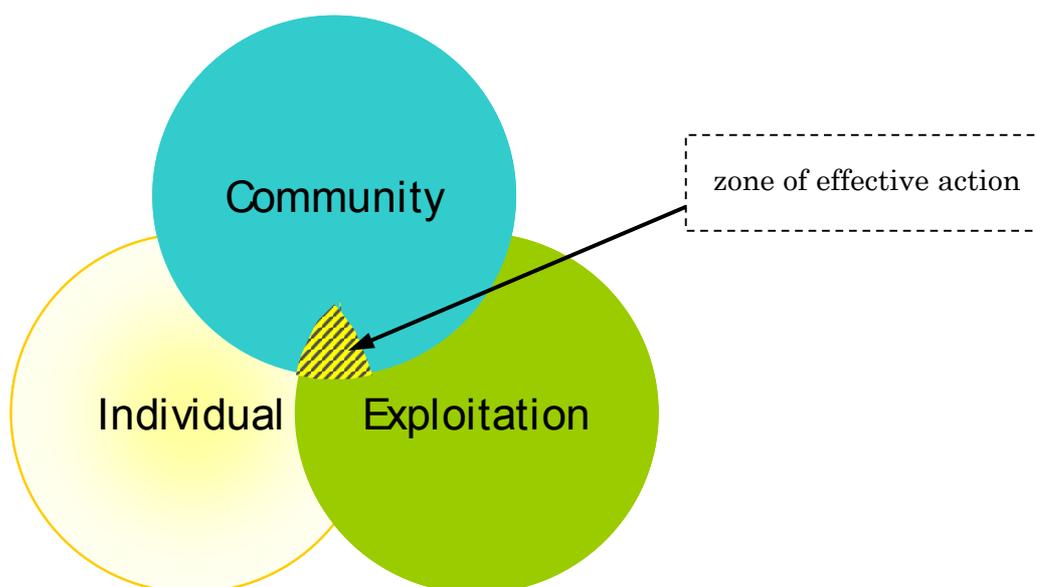
Consolidated Action: Individual, Community, Exploitation

Successful examples exist of reducing or eliminating the harm caused to individuals and communities through prostitution. The ACPO *Guidelines* provide one successful example, albeit a national one, of continuous partnership working. Sustainable results are difficult to achieve but they are more likely to be achieved if three aspects of prostitution are tackled simultaneously and sustainability. These aspects are:

- The **Individual**
- The **Community**
- Those who **Exploit** and abuse.

Where effective action takes place in all three aspects the greatest opportunities for sustainable outcomes are created. This is vividly expressed below.

Figure 3: "the ICE zone"



Method

Effective operational tools already exist to create effective tasking and coordinating at force, and if necessary regional, level. Similarly, those tools already exist to create effective operations at the divisional (BCU) and sector levels. These may be summarised as:

- NIM strategic and tactical assessment and subsequent tasking and coordinating processes
- “SARA” (Scan, Analysis, Response, Assessment) problem-solving techniques
- Crime and Disorder Reduction Partnerships (CDRP) established under Section 17 of the Crime and Disorder Act 1998
- Crime and disorder audits, surveys and consultation exercises assist planners in establishing the scale of the problem and the degree of public concern
- Existing strategy partnership under various legislation and regulations, e.g. ACPC, MAPPA, etc.
- Using the ACPO counter-trafficking guide ⁸

Following the strategic assessment, forces are advised to select from the range of tactical options following, which will inform the NIM Control Strategy options in respect of intelligence, prevention and enforcement.

Individuals

The principal aim must be to ensure that individuals do not become embroiled in prostitution in the first place. The second aim must be to ensure that where they are involved, opportunities are created for them to leave prostitution and engage in less harmful lifestyles. While people are engaged in prostitution they should receive the normal protection in law for crimes committed against them, and normal opportunities to receive healthcare and therefore minimise harm to themselves. Enforcement of the Street Offences Act 1959 and use of the the Home Office Circular 108/1959 should help to create exit opportunities for individual prostitutes, and prosecution should usually only be used where there is evidence of a persistent and voluntary return to prostitution after exit opportunities have been provided.

⁸ ACPO, *The Trafficking of Human Beings for Sexual Exploitation: an Investigators Guide*

These aims will be achieved by:

- Supporting education and child welfare workers in identifying vulnerabilities in young people, particularly sexual grooming by older men, which create the circumstances in which young people will become involved in child abuse through prostitution
- Assisting partner organisations, particularly in education and care regimes, in identifying at-risk individuals particularly the young and vulnerable
- Supporting “runaway” schemes which address the causes of why people run away from home; young runaways are highly vulnerable to entry into prostitution
- Establishing links with key partners to create partnerships which provide counselling, welfare, housing, training, and healthcare (particularly drug rehabilitation and safe sexual practice) to create opportunities for individuals to exit from prostitution
- Using the steps provided in Home Office Circular 108/1959 to engage individual prostitutes with exit partnerships
- Creating an intelligence “picture” of active prostitutes, new prostitutes to the area, kerb-crawlers and exploiters/coercers
- Linking the use of Acceptable Behaviour Contracts and Antisocial Behaviour Orders with individual prostitutes to ensure that they engage with exit partnerships
- Prosecuting individual *adult* street prostitutes under the Street Offences Act 1959 (loitering or soliciting for the purposes of prostitution in a street of public place) only where there is evidence of a persistent and voluntary return to prostitution (including where two cautions have been received under Home Office Circular 109/1959 *and* where exit partnership support has been offered and declined)
- Providing safe housing and witness protection to prostitutes who wish to provide intelligence and evidence against individuals who abuse, exploit and coerce
- Thoroughly investigating allegations of violence and sexual offences made by prostitutes (these allegations most emphatically must not be treated as “occupational hazards”)
- Supporting local “Ugly Mug” schemes
- Supporting health, welfare and education organisations in promoting safe sex practice by prostitutes
- Treating all children (i.e. those defined as “children” within the meaning of the Children Act 1989) abused through prostitution

in accordance with the ACPO *Guidelines* and Home Office/Department of Health circular⁹

- Treating foreign nationals as potential victims of “trafficking for the purposes of sexual exploitation” in accordance with the ACPO Counter-Trafficking Guide¹⁰ unless and until it becomes clear that they have not been trafficked into the UK
- Establishing investigative and intelligence-building partnerships and information exchange protocols with key partners, including Her Majesty's Immigration Service, Customs and Excise, Crime and Disorder Reduction Partners, ACPCs, etc.
- Ensuring staff are fully briefed on the issues and understand their obligations to protect vulnerable and intimidated victims and witnesses.

Community

The National Reassurance Policing Programme (NRPP) focuses on the use of citizen-led policing to target visible crime and disorder. Overall crime has fallen, yet over 70% of the public think that crime has actually risen. One reason for this mismatch is that the public's perception of crime is formed by what they experience regularly, often via the media on which they base their views about levels of local security.

The presence of prostitution in an area is likely to be a “signal crime”, and will have a disproportionately negative affect on a community's confidence and well-being. Conversely, the implementation of successful, sustainable strategies which eliminate or substantially reduce prostitution can increase community confidence and decrease the opportunities for other related forms of crime and disorder.

A community affected by prostitution is often stigmatised as a “red light” district, although most residents and people who legitimately frequent the district have no say in whether their community is a concentration for prostitution.

Harm that can be inflicted on communities by prostitution includes:

- Harassment of people – generally women, by kerb crawlers
- Environmental – e.g. discarded syringes and used condoms

⁹ *Working Together to Safeguard Children*

¹⁰ *The Trafficking of Human Beings for Sexual Exploitation: An Investigators' Guide*

- Noise/visual pollution – prostitutes and those associated with them loitering in the neighbourhood, prostitutes’ cards in phone booths
- Associated crimes– e.g. drug dealing, robbery, blackmail, protection
- Loss of real-estate and other economic value to the neighbourhood – low house prices and restricted business opportunities
- Exposure to moral risk to vulnerable, especially young people

Such harm can be caused either through off- or on-street prostitution. Off-street prostitution can be more discreet and therefore less likely to result in collateral damage to the neighbourhood, but there is still likely to be exploitation and coercion of individuals.

“Crackdowns” on either prostitutes or kerb-crawlers are at best likely to prove only short-term palliatives and may result in displacement to other areas. Displacement is not a solution.

These aims will be achieved by:

- Using NIM assessments and CDRP audits and surveys to establish the scale of *on* and *off* street prostitution activity, and community concerns and expectations
- The development of “priority zones” in identified areas of prostitution activity, in which individual and community victims are supported by a range of progressive interventions
- Reflecting evidence of off- and on-street prostitution problems in the statutory (Section 17 of the Crime and Disorder Act 1998) three-year crime and disorder reduction strategies
- Engaging with community representatives in creating problem solving opportunities, but avoiding displacement-only options
- Creating environmental solutions with partners, including designing out opportunities for prostitution and kerb crawling , clearing up debris,(the broken window principle) and using CCTV
- Supporting partners in establishing or maintaining diversion and exit schemes, including drop-in centres, safe-houses, outreach workers, vocational training, health and educational welfare schemes
- Using partners in local authorities to close down off-street activity i.e massage parlours and saunas acting as brothels.
- Using partners, including local authorities and BT, to remove prostitutes’ cards from telephone boxes, and arresting those who place them there

- Deploying intelligence-led visible police patrols
- Applying, where appropriate, the examples provided in the Home Office Research Study pamphlet *Tackling Street Prostitution: Towards and holistic approach*¹¹

Exploitation

The figures referred to in Section 2 show that the number of exploiters punished by the law is low compared to the number of prostitutes convicted/cautioned. Police activity is therefore not yet a strategic threat to those who exploit at levels 2 and 3 of the NIM. A strategic assessment which looks at profitability and exploitation will reveal the depth of the prostitution problem in an area, and demonstrate the links to other serious organised crimes.

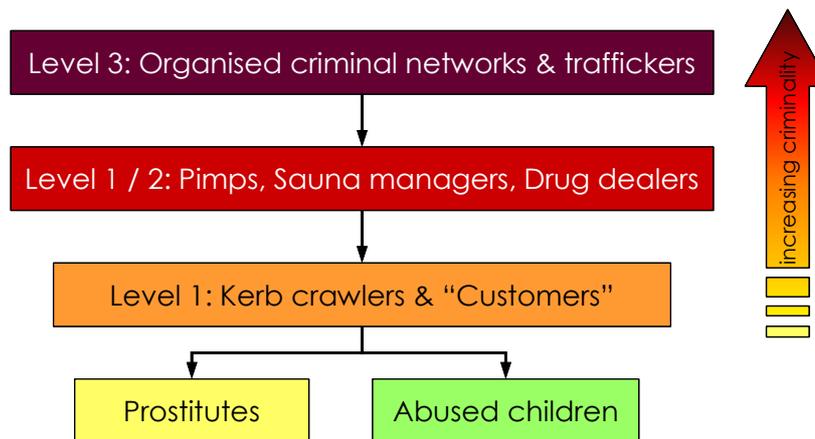
In many cases, prostitution starts with offences being committed against children. The number of children involved in prostitution is unknown, but Operation Ore has demonstrated the significant level of criminal activity against children worldwide. Sexual abuse of children alters their value judgements, damages their self-esteem makes them vulnerable to exploitation, and has the potential for repercussions in adult life and a route into prostitution.

Self-esteem can also be lost through chaotic parenting, emotional blackmail, involvement in domestic violence and/or drug usage, leading to increased vulnerability to exploitation. Exploitation often has its roots in these social problems; this is an area where proactive investigation and action may have the most beneficial, preventative and long-term effects.

People who use the services of prostitutes (e.g. kerb-crawlers) would not consider themselves to be exploiters, but it is prostitutes' loss of self-esteem (and/or drug dependency, poverty, etc.) that is being exploited.

¹¹ Hester & Westmarland, 2004

Figure 4: “Chain of Crime” associated with prostitution



The impact of the crimes committed against adults trafficked for sexual exploitation is considerable. Intimidation of trafficked women is likely to be a significant inhibition on seeking help to exit or provide evidence against those who have abused and exploited.

Given the opportunities for high profit from organised prostitution, criminals are likely to protect their assets using extreme measures: “turf wars”, murder or other critical incidents are a potential development. This emphasises the importance of proactivity in identifying, disrupting and detecting this form of organised crime.

However, new investigative and legislative techniques and tools are available and these should be used increasingly in gathering intelligence and investigations.

Organised off-street prostitution can be “big business”, with significant profits being made in a highly organised and businesslike manner. Like other, more mainstream businesses, these businesses carry overheads and administrative costs which have to be financed through the primary business activity. Ultimately, however, the money made through this illegal business activity must enter the legitimate economy, even if only through cash transactions.

This business activity creates opportunities for investigation. Asset seizure hits at the profits. Properly focused financial investigations therefore have the capacity not only to create opportunities for prosecution but also to hit at the profits being made. In other words, financial investigation and asset seizure increase risks and diminish rewards.

The importance of gathering intelligence against organised exploiters cannot be too highly stressed. However, passive intelligence gathering techniques are unlikely to reveal the true extent of a problem, at level 1, 2 or 3. It is essential, therefore, that proactive

intelligence means are used, providing full problem profiles which can be used at all three levels of the NIM. Not all such activity involves sophisticated covert or technical techniques – the “personal ad” columns of local newspapers, the phone book and the Internet (notably “Punternet”) are all likely to create a reasonable intelligence picture of activity at levels 1 and 2, and possibly 3, without travelling further than an office with phone and internet access.

These aims will be achieved by:

Creating proactive intelligence gathering capabilities within forces by:

- Imaginatively using all intelligence gathering techniques, including:
 - ⇒ “Desktop” research into newspaper advertisements, telephone directories, Internet sites (e.g. “Punternet”), property letting agencies, etc.
 - ⇒ Community intelligence gathering techniques, including information from local crime and disorder audits and surveys
 - ⇒ Intelligence debriefs of prostitutes, their associates and friends, clients, kerb crawlers, etc.
 - ⇒ Technical surveillance under appropriate authorities
 - ⇒ Covert Human Intelligence Sources (CHIS)
 - ⇒ Test purchase operations (N.B. test purchase officers must be appropriately trained and qualified, and must *never* engage in sexual acts)
 - ⇒ Financial investigation under the Proceeds of Crime Act (POCA)
 - ⇒ Intelligence and information sharing with key partners including Customs And Excise, Her Majesty's Immigration Service, local authorities, Health and Safety Executive, British Telecom, etc.
- Coordinating intelligence gathering through NIM
 - ⇒ Understand connections with other forms of organised crime and illegal economic activity (e.g. protection, car crime, trafficking, squeegee merchants, cheap labour in restaurants, illegal minicab hires, etc)
 - ⇒ Include in-force level risk assessment “Negative statement”, *if justifiable*, following an outline of what proactive intelligence gathering has been undertaken to inform risk assessment
 - ⇒ Include response in Control Strategy using standard problem analysis framework:

- Victim
- Offender
- Location
- Building an intelligence picture of:
 - ⇒ Controllers, exploiters, abusers, and supporting associates (including those in the control and exploitation chain who manage and administer prostitution related activity, e.g. so-called madams, maids, etc)
 - ⇒ Users and abusers of prostitutes (i.e. kerb crawlers and so-called clients)
 - ⇒ Premises used (N.B. it is essential that intelligence gathering techniques are used to understand what is happening in suspected premises; informal visits are unlikely to reveal the true picture of activity on premises, as those involved in the management of premises will seek to hide the true nature of activity from visiting officers)
 - ⇒ Those engaged in prostitution: creating intelligence gathering opportunities through confidence building measures with individual prostitutes
- Matching response to risk
 - ⇒ Consider creating or maintaining specialist units with appropriate resources and skills balance
- Contributing a force level strategic assessment to the national strategic risk assessment
- Encouraging the Home Office to include prostitution in the National Policing Plan, and resource appropriately
- Including in the Police Authority's Local Policing Plan
- Assessing regional and cross-border risk
- Engaging with and using NCIS and NCS and successor organisations (Serious and Organised Crime Agency)
- NCS coordination through "Operation Reflex"
- Instigate financial investigation and asset seizure
- Fully investigating allegations of assaults, sexual abuse and other crimes made by prostitute victims
- Implementing witness protection schemes to protect vulnerable victims
- Using alternative charges where appropriate, e.g. Perverting the Course of Justice, Conspiracy, False Imprisonment, etc.

- Ensuring operational security (with significant risks being run by organised crime gangs and a highly vulnerable witnesses, it is essential that the integrity of operations is maintained at all times)
- Effective counter kerb-crawling operations
 - ⇒ DNA samples to be taken in all cases
 - ⇒ Progressive cautioning schemes to be applied in line with a prostitute cautioning policy
 - ⇒ ABCs and ASBOs to be applied in persistent cases
 - ⇒ Vehicle seizure orders to be used in persistent cases

Crime and Disorder audits

The presence of prostitution in an area is likely to be a “signal crime”. Statutory partners, including principally police forces and local authorities, are required under Section 17 of the Crime and Disorder Act 1998 to form partnerships and implement strategies which address crime and disorder problems in their areas. Before adopting their strategies the partners are required to conduct an audit of crime and disorder in their areas, and in developing their strategies take account of public concerns. Areas, therefore, should proactively identify the scale of prostitution.

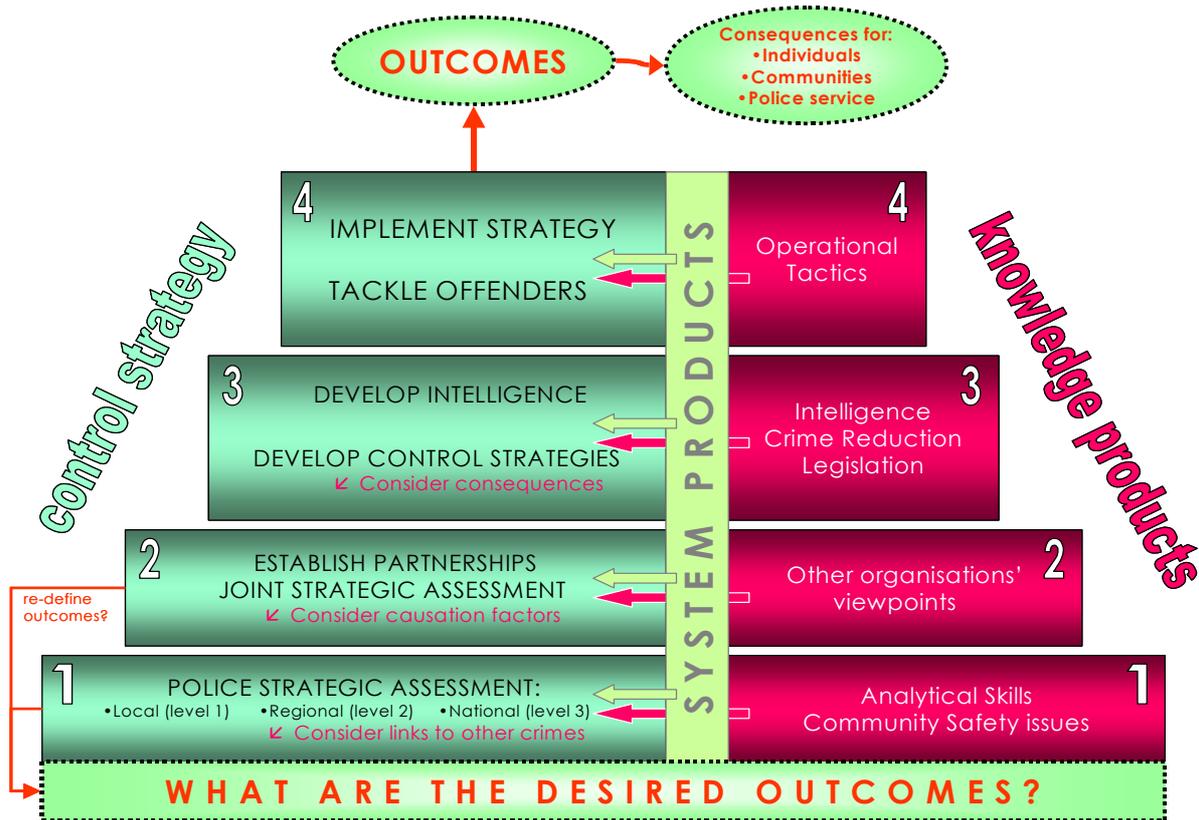
Finding and implementing solutions then becomes the responsibility of a range of organised bodies. Section 17 emphasises that partnership approaches to prostitution problems in an area are lawfully the **responsibility of a range of agencies** and not simply the police.

Crime and Disorder Partnerships should be encouraged to reflect prostitution problems and harm reduction strategies in their three-year plans and to corporately allocate sufficient resources to address them.

In developing new Crime and Disorder strategies, forces and BCUs are encouraged to share appropriate intelligence, derived from the NIM, with partners. Equally, forces and BCUs should take into account community and partner perspectives in finalising their strategic assessments.

Step-by-step NIM approach

Once the scale of the problem within an area has been identified and desired outcomes defined, individual forces or BCUs can create their own tailored strategies for the control of prostitution using the NIM-based framework shown below. Steps 1 to 4 should be followed from the bottom to the top of the pyramid.



8. Summary

This strategy does not offer a “solution” to all the problems associated with prostitution; these problems are often of a longstanding and complex nature which belie simplistic approaches. However, it does seek to offer a cohesive and rational alternative to a series of uncoordinated local initiatives.

It also offers the prospect of making life better for some individuals and communities in both the short- and long-term, and of increasing the risks and penalties on those who abuse, coerce and exploit. The key is to tackle three aspects of prostitution – the individual, the community and those who exploit – simultaneously and sustainably.

Running through the whole strategy is the partnership principle. Without partnerships at the appropriate level this strategy will not work, progress will not be made and victims will not be helped. The onus to create effective partnerships rests with all responsible elements, particularly those who have a statutory requirement under Section 17 of the Crime and Disorder Act 1998, and not simply the police. However, the police are often in a place to act as a catalyst, and wherever possible should seek to use their expertise and resources to create and maintain effective partnerships. The victimised communities and individuals will benefit if we do.

9. References & further reading

ACPO National Intelligence Model: more information on <http://www.police.uk/nim2/>

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