

# FINAL Integrated Impact Assessment – Summary Report

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Each of the numbered sections below must be completed  
Please state if the IIA is interim or final

## 1. Title of proposal

Introduction of a 'Commercial Sexual Exploitation Position Statement' for Edinburgh

## 2. What will change as a result of this proposal?

Equally Safe is Scotland's strategy to prevent and eradicate violence against women and girls (VAWG). The strategy provides a list of phenomena that constitute VAWG, one of them being Commercial Sexual Exploitation (CSE) including prostitution, lap dancing, stripping, pornography and trafficking.

The City of Edinburgh Council is a key stakeholder in the Equally Safe Edinburgh Committee (ESEC), an inter-agency partnership working to implement Equally Safe across Edinburgh. The ESEC reports annually to COSLA and the Improvement Service on agreed criteria assessing progress towards the full implementation of Equally Safe. One of the key criteria is that *"The local authority has a clear position statement in place that recognises CSE (including prostitution, lap dancing, stripping, pornography and trafficking) as a form of VAWG and notes its commitment to promoting the safety and wellbeing of women involved in selling or exchanging sex."*

By endorsing the proposed position statement the City of Edinburgh Council affirms its commitment to Equally Safe by recognising CSE as a form of VAWG rather than a valid form of work, and commits to developing service provision to be able to respond to the needs of people affected by CSE, including support to exit the sex industry.

## 3. Briefly describe public involvement in this proposal to date and planned

The Position Statement (and its accompanying Briefing Paper) was created by the CSE Short-Life Working Group (CSE SLWG) a subgroup of the ESEC, over a period of 16 months. The members of the SLWG included statutory and voluntary organisations and services with long-standing experience in supporting people (primarily and overwhelmingly women) involved in Edinburgh's sex industry. These organisations and services were able to relay the experiences of the people they have supported over the years to inform the Position Statement. The CSE SLWG and the ESEC further engaged with organisations staffed by women with lived experience of the sex industry to take their views into consideration, while it also included thorough academic research into women's experiences. Last but not least,

the views of Edinburgh residents are included, as shared in public consultations on the licensing of Sexual Entertainment Venues (SEVs) and on Women's Safety in Public Places.

As a general principle, the Equally Safe Edinburgh Committee opts to involve VAWG organisations instead of people with lived experience in the creation and review of policies, procedures and in Integrated Impact Assessment meetings. There are a number of reasons behind this decision:

- i. The ESEC deals with highly sensitive issues which can be extremely challenging to discuss from a lived experience perspective due to their potential to re-traumatise survivors.
- ii. Additionally, involving survivors directly in IIA discussions can be not only retraumatising, but also has the potential to generate risk should the survivors' contact information or any identifying information be shared.
- iii. The organisations and services who are members of the ESEC overwhelmingly offer people who access them platforms and forums in which to share their experiences and feedback on what works well/not well for them, and what changes they would like to see happen. These experiences and comments are subsequently fed back to the ESEC either during committee meetings or during IIA meetings.
- iv. An additional consideration in engaging with services in the IIA process as opposed to individuals is that services and organisations who are ESEC partners share decades of experience in supporting women and children affected by gendered violence. This enables them to share the experiences and comments of multiple people as opposed to individual experiences and comments, which, though incredibly valuable does not provide the same breadth of perspective.
- v. To mitigate these risks and to ensure that our IIA reports are as inclusive of all protected characteristics, we engage with VAWG organisations that provide support to large cross-sections of the population affected by the issues to which the policy/procedure/IIA refers. With regards to the IIA on the proposed CSE Position Paper, the organisations involved carry out work with people (especially women) with the following protected characteristics:
  - a. The [Multicultural Family Base](#): Works cross-generationally with individuals and families from minority ethnic/religious backgrounds, including children, parents, older people, people who are LGBT+, pregnant, migrants, survivors of gendered violence (including human trafficking), people affected by/at risk of poverty, people who are care experienced, people who are single/married/civilly partnered/divorced, neurodiverse people, people with disabilities and people who live in Edinburgh.
  - b. [Beira's Place](#): works with any woman over the age of 16 who has experienced sexual abuse or violence at any point in her life on a single-sex basis. This includes women of any ethnic/religious background, age, sexual orientation; women who are pregnant, parents, who have disabilities, and women with any marriage/civil partnership status.

- c. [Not Buying It](#) is a UK-wide organisation campaigning against the Commercial Sexual Exploitation (CSE) of women and girls since 2016, particularly in prostitution and in the sexual entertainment industry. Their work has involved extensive direct engagement with women working in pornography, sexual entertainment, escorting, and women selling or exchanging sex, as can be evidenced by [numerous resources](#) the organisation has produced on the subject.
- d. [WISHES](#) ('Women's Inclusive Sexual Health Extended Service' – NHS Lothian) is a single-sex service that supports any adult woman in Edinburgh and the Lothians affected by CSE with any protected characteristic.
- e. [Willow](#) is a service provided by the Council to any woman over the age of 17 who is at any stage of involvement in the justice process. This service work with women of any age, ethnic/ religious background, women who are pregnant/parents, women with disabilities, and women with any marriage/civil partnership status. Over 96% of the women accessing Willow have experienced some form of gendered violence in childhood and/or adulthood; many are affected by or at risk of poverty and substance use, and many are care-experienced or have had children removed from their care.

The majority of the organisations above work with adult women only. However, given the remit and nature of their work and the vulnerabilities affecting the women who access those services, their work inadvertently also involves child protection, either directly or indirectly.

Lastly, during the development of the CSE Position Statement and associated Briefing Paper, partners who took place in the process had the opportunity to comment on how well/not well the documents cover all protected characteristics, as well as additional individual characteristics and experiences of people who might be affected by CSE. The overwhelming agreement was that all protected characteristics are covered, as well as additional individual characteristics and experiences identified in the IIA but not protected by the Equality Act (2010).

**4. Is the proposal considered strategic under the Fairer Scotland Duty?**

Yes

**5. Date of IIA**

17 April 2024

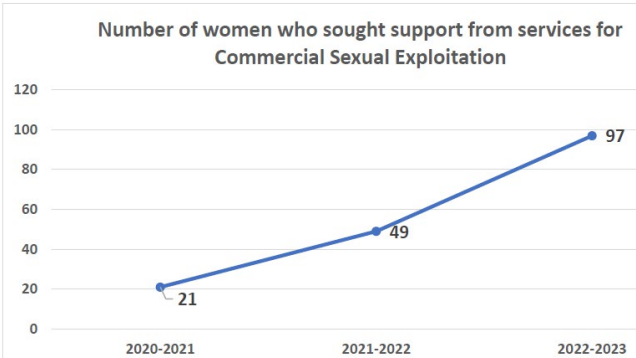
**6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)**

<b>Name</b>	<b>Job Title</b>	<b>Date of IIA training</b>
Angela Voulgari (facilitator)	Equally Safe Edinburgh Committee Lead Officer	18 May 2022
Reese Lee	Art Psychotherapist & Project Worker, Bright Choices, the Multicultural Family Base	
Caroline Smith	Service Commissioner, Domestic Abuse Services	
Isabelle Kerr	CEO, Beira's Place	
Angie Manske	Project, Worker, Bright Choices, the Multicultural Family Base	
Suzan Ross	Equality Diversity and Rights Advisor for Children's and Justice Services	
Dr. Sasha Rakoff	CEO, Not Buying It	
Sarah Fletcher	Joint Team Leader, Justice Services, Willow Project, City of Edinburgh Council	
Dr. Alison Scott	Consultant Gynaecologist, Deputy Director of Edinburgh Medical School (NHS)	

## 7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
<p>Data on populations in need</p>	<p>Norak, S. (2020): <a href="#">Loss of Self in dissociation in prostitution; recovery of self in connection to horses: a survivor's journey.</a></p> <p>Silbert, M.H. &amp; Pines, A.M. (1983): Early sexual exploitation as an influence in prostitution. Cited in: Farley, M. et al. (2003): Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder. <i>Journal of Trauma Practice</i>, vol. 2, No. 3 /4 , pp.33-74.</p> <p>Farley, M. et al. (2003): Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder. <i>Journal of</i></p>	<p><b>Women</b> and girls in CSE experience ‘loss of self’, dissociation, PTSD, which they do not often associate with prostitution.</p> <p>Entry into prostitution is multi-traumatic for women – it involves physical assault, rape, homelessness, PTSD, while 70% women and girls involved in selling/exchanging sex had been sexually abused as children.</p> <p>68% of women selling/exchanging sex meet the clinical criteria for PTSD.</p>

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	<p><i>Trauma Practice</i>, vol. 2, No. 3-4, pp.33-74.</p> <p>Encompass Network (2021): <a href="#">Snapshot Briefing, 2021</a>.</p> <p><a href="#">A v Burke and Hare (2021)</a>: Case No: EA-2020-SCO-000067-DT</p> <p>NSWP (2023): <a href="#">Decriminalisation: The Smart Sex Worker's Guide</a></p> <p>NSWP (2023): <a href="#">Sex Worker-Led Networks support for UN Working Group position paper on sex work</a>.</p>	<p>In 2021, 80% of women affected by CSE in Scotland who were surveyed by specialist services over the course of 1 week disclosed a diagnosed mental health issues including depression, anxiety, PTSD and BPD. 47% disclosed an addiction to alcohol and/or drugs (31% disclosed multiple addictions). Between 23%-36% disclosed childhood sexual abuse; between 54%-83% disclosed domestic abuse while 38.5% had been trafficked.</p> <p>Working as a SEV performer involves engaging in heavy flirtation with customers, with a view to paying for a private dance involving stripping entirely naked in front of the customer. There is physical contact against the club rules, and the job involves the risk of physical assault and customers following women home.</p> <p><b>Being</b> able to safely earn a living is a fundamental human right, and decriminalisation is the best way to achieve this for sex workers. Sex workers deserve the same rights as all workers, including protection from workplace exploitation, violence and police corruption, and the right to report workplace-related crime and access justice.</p> <p>The UN Working Group on Discrimination Against Women and Girls Position Paper on Eliminating Discrimination Against Sex Workers and Securing their Human Rights<sup>162</sup>, which “<i>proposes the full decriminalisation of adult voluntary sex work from a human rights perspective, as it holds the greatest promise to address systemic discrimination and violence and impunity for violations of sex workers’ rights</i>”</p>

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	Independent desk research	<p>A total of 26 adverts selected randomly from 4 websites indicated that women’s average age was 24 years (ranging from 21 to 37, but heavily skewed towards early 20s), and that half of the women advertised identified as Brazilian or ‘Oriental’. Three stated they were ‘new to Edinburgh’ and five declared they worked in the city centre (EH1, EH2 and EH6) while 2 websites also featured an explicit advert stating ‘Sugar babies: meet girls you thought were out of your league’.</p> <p>There are obvious concerns from the content of those adverts: there is no guarantee that any of the women, particularly those stating that they were new to Edinburgh or from Asia and South America have not been trafficked into the sex industry. Women’s young age was also alarming, indicating that among them might be higher education students funding their studies through selling sex. There is no way to be certain about whether any of the women advertised on those websites are independent or controlled by a pimp(s) or trafficker(s); whether they are in fact the age that they claim to be, or whether they are adults</p>								
Data on service uptake/access	ESEC annual reports to COSLA & The Improvement Service	<p>ESEC member organisations have reported that the number of women in Edinburgh seeking support from VAWG services as a result of their involvement in the sex industry locally has steadily doubled every year for the past 3 years.</p>  <table border="1"> <caption>Number of women who sought support from services for Commercial Sexual Exploitation</caption> <thead> <tr> <th>Year</th> <th>Number of women</th> </tr> </thead> <tbody> <tr> <td>2020-2021</td> <td>21</td> </tr> <tr> <td>2021-2022</td> <td>49</td> </tr> <tr> <td>2022-2023</td> <td>97</td> </tr> </tbody> </table>	Year	Number of women	2020-2021	21	2021-2022	49	2022-2023	97
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	<p>Lopez, Q. (2020): People turning to OnlyFans to earn money after losing their jobs during the pandemic. <a href="#">Business Insider</a></p>	<p>Many women with no prior experience in the sex industry resorted to platforms such as OnlyFans, which saw a 75% increase following the start of the 2020 lockdown<sup>125</sup>. Some already in the sex industry were able to live off savings, although many were forced to continue to sell sex in the full knowledge that this was breaking Covid 19 restrictions. In turn, sex buyers at the time were pushing women’s boundaries, with reports of increasing violence and abuse, counting on women’s reluctance to report to the police to avoid being charged with breaching Covid restrictions</p>
<p>Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.</p>	<p>Encompass Network (2021): <a href="#">Snapshot Briefing, 2021</a>.</p> <p>laisucklang, M. G. &amp; Ali, A. (2017): <a href="#">Psychiatric morbidity among female commercial sex workers</a></p> <p>ESEC partner organisations:</p>	<p>83% of women surveyed by specialist CSE services across Scotland in 2021 were affected by poverty; 80% experienced mental ill health, 79% faced issues with housing and 68% were affected by addictions.</p> <p>Women selling or exchanging sex present higher levels of psychological distress and are often the result of exploitation through selling sex, as well as through childhood abuse, poverty, interpersonal violence and substance use</p> <p>The profile of women in street prostitution in Scotland differs in the types and levels of need they face. Through anecdotal evidence from organisations directly involved in supporting women in this part of the sex industry, women who sell/exchange sex outdoors are largely British/Scottish, and more likely to have been affected by childhood sexual abuse, domestic and/or sexual abuse and other forms of gendered violence. They are more likely to be affected by substance and alcohol use and poverty. They are also more likely to be in their more</p>



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	<p>DecrimNow (tweet dated 18 June 2022, 9:25am)</p> <p>HAH Campaign (tweet dated 31 October 2022)</p>	<p>mature years, as younger women tend to use social media and online platforms more in order to arrange for the sale of sex and sexual activity.</p> <p>“The primary driver into the sex industry is poverty. People sell sex because they need money.”</p> <p>“With living costs increasing but the client pool shrinking, sex workers are feeling more pressure to accept clients and acts that they may not feel safe or comfortable with. This is unacceptable: the government must do more to support sex workers and to prevent people from having to go into sex work in the first place.”</p>
Data on equality outcomes	<p>Vaes, J.; Loughnan, S. and Puvia, E. (2014): The inhuman body: When sexual objectification becomes dehumanising. Cited in: Anzani, A.; Lindley, L.; Tognasso, G.; Galupo, M.P. and Prunas, A. (2020): “Being talked to like I was a sex toy, like being transgender was simply for the enjoyment of someone else”:  <a href="#">Fetishisation and sexualisation of transgender</a></p>	<p><b>Individuals</b> with protected characteristics are fetishised in pornography. This is problematic as it emphasises the sexual appeal of a particular characteristic rather than the person as a whole, contributing to dehumanisation and objectification.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Men and boys	<p><a href="#">and nonbinary individuals.</a> <i>Archives of Sexual Behaviour</i> 50, pp.897-911</p> <p>Horvath et al. (2013): A rapid evidence assessment on the effects that access and exposure to pornography has on children and young people. Cited in Martellozzo, E.; Monaghan, A.; Davidson, J. &amp; Adler, J (2020): <a href="#">Researching the effects that online pornography has on UK adolescents aged 11 to 16.</a></p> <p>Johansson T, Hammarén N. 2007. Hegemonic masculinity and pornography: young people's attitudes toward and relations to pornography. <i>Journal of Men's Studies</i> 15: 57</p>	<p>Almost 90% of online pornography contained acts of violence or physical aggression, with the perpetrators of that violence being usually male, while the targets were overwhelmingly female.</p> <p>Studies have found that young men who regularly consume pornography are more likely to have tried to perform acts they have seen in pornography, including high-risk practices</p>

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Impacts on transgender people	<p>Serano, J. (2007): Transsexualisation. Cited in: Anzani, A.; Lindley, L.; Tognasso, G.; Galupo, M.P. and Prunas, A. (2020): <a href="#">“Being talked to like I was a sex toy, like being transgender was simply for the enjoyment of someone else”</a>: <a href="#">Fetishisation and sexualisation of transgender and nonbinary individuals</a>. <i>Archives of Sexual Behaviour</i> 50, pp.897-911.</p>	<p><b>Trans</b> women report that pornography contributes to the fetishization of their transition journey, emphasizing that the ultimate goal is appeal to heterosexual men, rather than to affirm their own identity. They further report that this fetishization then continues on online forums, social media and online dating apps, where trans people have reported feeling appreciated solely for their trans identity rather than for being whole persons. It has also been linked to trans people’s involvement in selling sex.</p>
Women/people from minoritised backgrounds	<p>Benard, A.A.F. (2016): Colonising black female bodies within patriarchal capitalism: Feminist and human rights perspectives. <i>Sexualisation, Media &amp; Society</i>. 1(11).</p> <p>CEASE (Centre to End All Sexual</p>	<p><b>In</b> pornography, black women are often bound, gagged and/or in chains, and Asian women are almost always depicted in scenes of torture.</p> <p><b>In</b> the sex industry, women from minoritised backgrounds report feeling obliged to play out roles as, due to competition, this is the</p>

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People with disabilities	<p>Exploitation) (2019): <a href="#">‘Racism in the Sex Trade’</a>.</p> <p>Elman, R.A. (1997): Disability Pornography: The fetishization of women’s vulnerabilities. <i>Violence Against Women</i> 3(3) pp.257-270</p> <p>Jeffreys, S. (2008): Disability and the male sex right. <i>Women’s Studies International Forum</i> 31(5), pp.327 335</p>	<p>easiest way for them to make an income. This inadvertently perpetuates the racism and racist stereotypes within the sex trade.</p> <p><b>Disability</b> pornography not only contributes to misogyny and gender inequality, but also allows men to justify their abusive behaviours towards women by preying on the vulnerabilities of women with disabilities, increasing the possibility that they may be abused. Similarly, this dynamic is also reinforced in pornography featuring a man with disabilities being looked after and cared for a subservient woman.</p> <p><b>Any</b> kind of pornography featuring people with disabilities is dangerous in perpetuating ideas around male entitlement to the female body, including the idea that men with disabilities have a right to sexual access to prostituted women.</p>
Pregnant women and mothers	<p>Bindel, J. (2017): ‘Pregnant women are being legally pimped out for sex – this is the lowest form of capitalism’, <i>The Guardian</i></p> <p>Zago, L.F. (2020): <a href="#">Pedagogies of sexuality in pornoculture: Notes on milfs.</a></p>	<p><b>A</b> woman prostituted in a legal German brothel was paid to be ‘gangbanged’ by six men who asked to have sex with a heavily pregnant woman. Following this experience, she was distraught thinking that she had pimped out her unborn child-given the legal status of prostitution in Germany, there would have been no legal recourse for this woman or any right for the authorities to intervene to protect her or her unborn child.</p> <p><b>Mature</b> women are also fetishized in pornography, with ‘Milf’ (‘mother I’d like to fuck’) being one of the most searched terms on porn websites for white heterosexual men over 45. Mothers and ‘ milfs’ in pornography are portrayed as sexual ‘educators’ for</p>

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		<p>younger, sexually inexperienced men, often the sons of friends or family members. Women in those scenarios often initiate, guide and encourage action by the younger man while maintaining a passive and submissive role that is all about ensuring male pleasure. Such portrayals not only encourage heteronormativity but also appear to normalise relationships that border, or are, incestuous</p>
<p>Research/literature evidence</p>	<p>Donaghue, N. (2014): Sexualization. In: Teo, T. (2014) (ed): <i>Encyclopedia of Critical Psychology</i>. Springer, New York, NY.</p> <p>Coy, M. (2009): Milkshakes, lady lumps and growing up to want boobies: how the sexualisation of popular culture limits girls' horizons. <i>Child Abuse Review</i> (vol 18, Issue 6) pp. 372-383</p> <p>Horvath et al. (2013): A rapid evidence assessment on the effects that access and exposure to pornography has on children</p>	<p><b>The</b> sexualisation of popular culture negatively impacts girls' sexual and psychosocial development and its pattern of messaging is the same or similar to those beliefs that underpin the perpetration of VAWG.</p> <p><b>Research</b> has found links between boys' exposure to sexualised media and their perception of girls and women as sex objects.</p> <p><b>The</b> prevalence of male adolescents' viewing pornography can be as high as 83%-100% and between 45%-80% for females.</p>

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	<p>and young people. Cited in Martellozzo, E.; Monaghan, A.; Davidson, J. &amp; Adler, J (2020): <a href="#">Researching the effects that online pornography has on UK adolescents aged 11 to 16.</a></p> <p>Farley, M; MacLeod, J. et al. (2011): <a href="#">Attitudes and social characteristics of men who buy sex in Scotland.</a> <i>Psychological Trauma: Theory, Research, Practice and Policy</i>. Vol 3 (4), pp.369-383).</p> <p>Farley, M. et al. (2003): Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder. <i>Journal of Trauma Practice</i>, vol. 2,</p>	<p><b>31%</b> of men who frequent SEVs in Scotland make arrangements to buy sex off premises.</p> <p><b>In</b> research carried out in 9 countries globally, prostitution was found to have been ‘multi-traumatic’ for women. The report included that 71% were physically assaulted; 63% were raped by buyers; 89% wanted to escape but had no other means of survival; 75% had been homeless at some point in their lives, while 58% met the clinical criteria for Post-Traumatic Stress Disorder (PTSD).</p>

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	<p>No. 3-4, pp.33-74.</p> <p>laisucklang, M. G. &amp; Ali, A. (2017): <a href="#">Psychiatric morbidity among female commercial sex workers</a>. <i>Indian Journal of Psychiatry</i>, Vol. 59(4): pp 465-470</p> <p>Cunningham, S. et al. (2018): <a href="#">Sex Work and Occupational Homicide: Analysis of a UK Murder Database</a>. <i>Homicide Studies</i>, Vol 22, issue 3.</p> <p>Willis, B.; Welch, C.; and Onda, S. (2016): <a href="#">Health of female sex workers and their children: a call for action</a>. <i>The Lancet Global Health</i></p> <p>Beyens, I., Vandenbosch,</p>	<p>Women selling or exchanging sex present higher levels of psychological distress and are often the result of exploitation through selling sex, as well as through childhood abuse, poverty, interpersonal violence and substance use</p> <p>Women who sell or exchange sex are at the highest risk group for murder in the UK, 12 times more likely to be the victims of murder than the general population.</p> <p>Research carried out globally has found that women who sell sex reported more stillbirths and serious health problems among their children, including neonatal death, low birth weight, prematurity, behavioural and emotional problems and discrimination and exclusion at school. In particular, women who had been trafficked in the sex trade reported not knowing that they were pregnant in order to receive antenatal care, while those who knew were still forced to sell sex by pimps because ‘pregnancy sells’. Others reported using alcohol and drugs throughout their pregnancies because they needed substances in order to cope with selling sex</p> <p>There is increased peer pressure between adolescent boys to consume online</p>

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	<p>L., &amp; Eggermont, S. (2014). Early Adolescent Boys' Exposure to Internet Pornography: Relationships to Pubertal Timing, Sensation Seeking, and Academic Performance. <i>The Journal of Early Adolescence</i>, Vol. 35, Issue 8, pp. 1045-1068</p> <p>Garner, M. &amp; Elvines, F. (2013) The cultural harm of pornographic depictions of rape: creating a conducive context for violence against women and girls. <i>Rape Crisis South London</i></p> <p>Farley, M; MacLeod, J. et al. (2011): Attitudes and social characteristics of men who buy sex in Scotland. <i>Psychological</i></p>	<p>pornography and the more time adolescent boys spent consuming online explicit content, the poorer their school grades were 6 months later.</p> <p>There are links between pornography consumption and attitudes supporting violence in men</p> <p>Over 25% of men interviewed reported that they had used a woman in prostitution who they knew was under the control of a pimp. Beyond using women in prostitution, 54% who more frequently paid for sex had committed sexually violent acts towards romantic partners; 43% admitted to pressuring non-prostituted women to have sex with them through lying, and 12%</p>



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	<p><i>Trauma: Theory, Research, Practice and Policy</i>. Vol 3 (4), pp.369-383</p> <p>Friedman, S. (2013). And boys too: An ECPAT-USA discussion paper about the lack of recognition of the commercial sexual exploitation of boys in the United States (Rep.). Brooklyn, NY: ECAPT-USA</p> <p>Friedman, S. (2013). And boys too: An ECPAT-USA discussion paper about the lack of recognition of the commercial sexual exploitation of boys in the United States (Rep.). Brooklyn, NY: ECAPT-USA</p> <p>United Kingdom: All-Party Parliamentary Group on</p>	<p>admitted to having verbally pressured other women into sex.</p> <p>Boys and men share numerous risk factors for sexual exploitation, such as a history of sexual violence, domestic abuse, substance abuse and homelessness, and they also faced challenges in accessing services due to widespread beliefs by service providers that their physical strength would permit them to escape abuse and exploitation</p> <p>Unlike women and girls, men and boys are much less likely to be exploited by a pimp, more likely to have been recruited by friends or peers.</p> <p>Men who sell sex were found to be largely disadvantaged, with low educational attainment, low income, unstable housing and often using drugs and alcohol.</p>

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	<p>Prostitution and the Global Sex Trade (2014): <a href="#"><u>Shifting the Burden: Inquiry to assess the operation of the current legal settlement on prostitution in England and Wales</u></a></p> <p>Cross Party Group on Commercial Sexual Exploitation (2021): <a href="#"><u>Online Pimping: An inquiry into Sexual Exploitation Advertising Websites.</u></a></p> <p>Coy, M.; Horvath, M. &amp; Kelly, L. (2007): <a href="#"><u>'It's just like going to the supermarket': Men buying sex in East London.</u></a> London Metropolitan University, Child and Woman Abuse Studies Unit</p>	<p>An inquiry into websites that advertise women selling sex and sexual entertainment found that over 500 adverts were posted on one of Scotland's leading platforms on a single day. The same enquiry found that these websites are "a major enabler of sex trafficking and sexual exploitation in Scotland", that opportunities and incentives to traffic and exploit women via these websites cannot be 'designed out' of them, that they knowingly facilitate and profit from prostitution and that ultimately, "sexual exploitation advertising websites do not enhance the safety of women. They endanger vulnerable women by incentivising and enabling sex trafficking". (p.12)</p> <p>It is the presence of an open and visible sex industry that can actually further fuel demand-not that the demand drives supply.</p>

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	<p>Benson, C. &amp; Matthews, R. (1995): Street Prostitution: Ten Facts in Search of a Policy. <i>International Journal of the Sociology of Law</i>, Vol23, pp. 395 – 415.</p> <p>Shannon, S. (1997): Prostitution and the Mafia: The Involvement of Organised Crime in the Global Sex Trade. <i>Transnational Organised Crime</i>, Vol. 4, Issue 4, pp.119-144</p>	<p>On average, women enter the sex trade from age 15 in the UK.</p> <p>The sex industry has strong ties to serious and organised crime groups involved in human trafficking, drug trafficking, providing security or liaison services to pimps, brothel owners and other mafia groups. Their involvement is essential to the efficiency and success of the sex industry.</p>
Public/patient/client experience information	<p>McNulty, T. (2020): <a href="#">‘Edinburgh dancers slam council plan to cap sexual entertainment venues’</a>, <i>Edinburgh Live</i></p> <p>Rape Crisis Scotland (2021): <a href="#">‘Statistics and Key Information’</a>.</p>	<p><i>‘A lot of people don’t realise that we have to pay to be at work-these fees are arbitrarily set by owners and they can be changed at a moment’s notice’</i></p> <p><b>According</b> to Rape Crisis Scotland, only 52% of survivors who sought help from the organisation reported the rape to the police.</p>

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	<p><a href="#">Recorded Crime in Scotland, 2022-2023</a></p> <p>SEV licensing consultation, Autumn 2022; report to the <a href="#">Regulatory Committee dated Thursday 2 December 2021 (Appendix 6)</a></p>	<p><b>Sexual</b> crimes account for 5% of all crimes in Scotland and in 2022-2023 they were at their second highest rate since 1997, including a 3% drop since 2021-2022. Rape and attempted rape accounts for 17% of all sexual crimes, and the number of rapes and attempted rapes has steadily increased over the years since 2013-2014.</p> <p><i>‘These places devalue the area in which they operate. They attract people of unfavourable character as both legal and illegal operations are associated with the type of people who would frequent an establishment which has a lap dance. A lap dance would be the appetiser for a much more destructive and unhealthy interaction for society’.</i></p> <p><i>‘I absolutely hate seeing these venues in the city and I think it really ruins the tone of the city which is an historic and welcoming city for tourists. I think the council should adopt a strong stance against sexual entertainment as it continues to support an unhealthy sexual view of women in society. A policy is required to enable the council to prevent these establishments from operating in the city area at all.’</i></p> <p><i>‘Closing SEV venues will only drive the industry underground and therefore put workers at risk and loss of jobs, also causing workers into more dangerous jobs in order to make ends meet. The clubs operate under strict working conditions in order to keep everyone safe and happy. As a dancer of 6 year, I can strongly argue I have always been genuinely safer in a lap dancing club than I am fully clothed in a nightclub. As security guards, cameras and management support measures are firmly in place to ensure our safety and well-being at all times. While nightclubs also offer cctv and security, harassment is never taken seriously by security and staff and is usually dismissed as “that’s just the way it is” approach. Lap</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Women’s Safety in Public Places</p>	<p><i>dancing allows workers a safe comfortable and flexible place of work with better support options than most “normal” jobs despite being stricter. Closing clubs or limiting sex venues to 0 would only put workers at risk.’</i></p> <p><i>‘Where these premises exist, prostitution is encouraged. Children and girls are taught that their self worth is only in sex. Men in these areas treat all women and girls as being for sale or their use and not as people’.</i></p> <p><i>‘I strongly disagree with any move to set limits at nil. Sex workers should be able to go about their lawful business without the judgment of the council. SEV’s are often much safer for these workers than alternative locations. This city has a fairly progressive record in these matters regarding the tolerance zones, which were sadly ended by Police Scotland, we should return to that evidence based empowerment model rather than moralisation’</i></p> <p><i>‘There should be an acknowledgement that concentrating these premises in central areas does mean other businesses may seek to locate elsewhere and that tourists, other than those interested in such premises, will not want to stay in these areas. A good reason to limit them. Massage parlours and/or saunas should also be tightly regulated. Students, particularly females, will not want to frequent areas where sex clubs are located because these will be perceived as unsafe. Sexual harassment of young females in the city is already a problem (ask the student associations/unions). They should not be near purpose-built student accommodation. Edinburgh should be a family friendly city where women feel safe. This should be the main focus of your policy.’</i></p> <p><b>“Pubic Triangle lap dancing/strip bars. [I’m] aware that men congregate here to objectivise women, attend ‘performances to</b></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Consultation, Summer 2022. Presented in the <a href="#">report to the Regulatory Committee on 5 February 2024 – appendix 6</a></p>	<p><i>get fired up but not ‘satisfied’ as they would in a brothel.”</i></p> <p><i>“Sexual harassment guaranteed if walking here at night.”</i></p> <p><i>“People hanging around in this area. Lots of men walking here.”</i></p> <p><i>“Strip clubs and those who hang around them.”</i></p> <p><i>“The lap dancing clubs at night make this place feel very unsafe. Big groups of men on stag nights.”</i></p> <p><i>“Narrow pavements with guard rails mean it is sometimes difficult to get away from uncomfortable, possibly dangerous situations.”</i></p> <p><i>“Walking past the strip clubs is horrible. Getting cat called, groped and followed by drunk men who feel somehow entitled to this behaviour after watching women stripping for them. It’s disgusting, backwards and this should not be happening in Edinburgh!”</i></p> <p><i>“Groups of men often under the influence of alcohol gathering and loitering around sexual entertainment venues. Loud behaviour, calling names and making comments about women passing by. Often these have sexual connotations and make women feel that they are at risk of sexual or other assault.”</i></p> <p>During the same consultation, there were approximately 8 responses stating that women felt safer in the area known as ‘the pubic triangle’. There were no specific mentions to the SEVs located there but people’s feedback focused on the presence of a number of businesses in the area, the area being well-lit, naturally surveilled by local residences and experiencing a high footfall.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Communication with ESEC member organisations: third sector and health services</p> <p>Scottish Government, 2017: <a href="#">Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews</a></p>	<p>The number of women seeking specialist sexual health support has been increasing in the last 3 years.</p> <p>There is no robust way to estimate the numbers of people selling/exchanging sex in Scotland. However, there is consensus that in Edinburgh, Glasgow, Dundee and Aberdeen, street prostitution is reducing, while online prostitution is increasing. Online prostitution is estimated to comprise 90% of prostitution in Scotland. There are indications that a higher proportion of foreign nationals are involved in indoor prostitution. Experiences of violence and victimisation are frequent for those involved in prostitution.</p>
<p>Evidence of inclusive engagement of people who use the service and involvement findings</p> <p>Women working in SEVs</p>	<p>McNulty, T. (2020): <a href="#">‘Edinburgh dancers slam council plan to cap sexual entertainment venues’</a>, <i>Edinburgh Live</i></p> <p><a href="#">A v Burke and Hare (2021)</a>: Case No: EA-2020-SCO-000067-DT</p>	<p><b>In this section we have collated testimonials from women who have worked in different parts of the sex industry. Sources are linked in the middle column.</b></p> <p><i>‘A lot of people don’t realise that we have to pay to be at work-these fees are arbitrarily set by owners and they can be changed at a moment’s notice’</i></p> <p><b>A former</b> performer at Burke and Hare, one of Edinburgh’s three currently operating SEVs, described her work as follows: <i>‘The job is to engage in heavy flirtation with customers, including intimate discussions about one’s private life (almost entirely</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Women selling sex	<p>Green, a. (2016): <a href="#">‘What it’s like to work as an exotic dancer’</a>, <i>The Atlantic</i></p> <p>Bindel, J. (2004): <a href="#">Profitable Exploits: Lap Dancing in the UK</a>.</p> <p>Encompass Network (2021): <a href="#">Snapshot Briefing, 2021</a>.</p>	<p><i>fabricated by most dancers). This is with a view to paying for a private dance which involved my stripping entirely naked and showing the customer my naked body. The physical contact was limited to being touched by customers briefly without [our] consent and in breach of the club rules, and my sitting on clients’ lap, but the fully nude private dance involved the mimicking of sexual acts such as masturbation and sexual intercourse’(p.10) In the same ruling, the former performer stated that her work clearly ‘involved the risk of physical assault’ and that ‘customers had threatened to follow her home’ (p.7).</i></p> <p><i>‘Liza’, in an interview to The Atlantic, stated that ‘there’s no respect for what we do. [...] What we do could potentially be very dangerous. We could potentially have stalkers; someone could follow us home; we could have a customer who comes in to see us all the time and thinks he’s in love with us and you don’t know what he could do’</i></p> <p><i>‘They want us to dress like real tarts, and we are told to show as much ‘tits and arse’ as possible [...] ‘I have two children, who I have to support by doing this. I feel really yucky prancing around in a school uniform because I feel I’m encouraging perverts who come to the club to abuse children’ (p.41)</i></p> <p><i>“I didn’t think of my prostitution as traumatic – but it left me with PTSD [...] When what you’ve experienced is normalised, the psychological after-effects may be attributed to something else, or ignored entirely. But trauma comes in many guises, and violence is not always obvious. [...] We don’t understand the scope of trauma in women because sexual violence and coercion have historically been dismissed as just other, if controversial, forms of sexual possibility. If we are to better understand PTSD in women</i></p>



Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Doring, M. (2022): <i>Any Girl: A Memoir of Sexual Exploitation and Recovery</i>. Ireland: Hachette Books</p> <p>Nordic Model Now! (2019): <a href="#">I survived but only just &amp; sometimes I wish I hadn't</a>.</p> <p>Johns (2013). [Exhibition]. Available <a href="#">on this link</a>, as accessed on 11 May 2023</p>	<p><i>we need to start-seriously-rewriting this script</i>".</p> <p><i>'Agreeing to something does not make that thing any less harmful for our bodies or minds. It is psychologically exhausting, damaging and toxic to fake a connection to someone, especially a sexual connection. Not being free to be yourself in such a vulnerable and intimate situation is physically and psychologically exhausting. Being paid to have sex on someone else's terms is the farthest thing from sexual autonomy that exists.'</i></p> <p><i>"Over 5000 men raped me coz I never once wanted sex, so I didn't consent. That's the reality of being a prostitute". An anonymous survivor states "Even the 'good' johns traumatised me, as they got off on having more power than I did [...] The horror and PTSD will stick with me forever. I have trouble with sex and don't really feel sexual pleasure anymore. I can't sleep many nights."</i></p> <p><i>"Why I pay for sex? Women often get on my nerves. They cause stress. Paying for it, that's something. Jerking off on the face costs an extra 50. Actually, that's power. You can do what you want with the woman..."</i> Christian, 23</p> <p><i>"When you go to a club like this, you're not satisfied with normal women anymore. The characters! My daughter? She's 26, I make sure the women are at least 27. Many here have pimps. I saw with my own eyes how they cashed up."</i> Joachim, 58</p> <p><i>"Women like these, I would never get them normally. And here I can also sometimes go beyond boundaries. Anal, for example, costs an extra 100 euros. I've been going to the same one for three years. Twice a month."</i> Kai, 49</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Collective Liberty (2021): <a href="#">Human trafficking victims: Male perspective</a></p> <p>Martin, G. (2016): <a href="#">Prostitution in Scotland – the brutal reality: Part 3</a>. TFN</p> <p>Martin, G. (2016): <a href="#">The brutal reality of prostitution in Scotland – Part 1</a>.</p>	<p><i>“It just felt dirty. I couldn’t even get off because I couldn’t get into it. Like when I first started, like there’s like a wreck in here [pointing to his heart]. When you first start you feel like shit”</i> (male escort, 21 years old, Caucasian, bisexual).</p> <p><b>Cassie</b>, formerly employed in an Edinburgh sauna, describes her experience as follows: <i>“You’d start at 10 in the morning till 11 in the evening [...] It was almost like working in a factory, you know. Stuff comes down the conveyor belt, you pack it, it goes. Any pimp’s exploiting. They’re making money. They don’t care about the girls that are working for them. Any pimp that claims that he does is an absolute liar because no man goes into that industry having respect for women, none. They don’t care. The more broken these girls are the more control they have over them, you know. I’ve seen so many girls just fall apart... like a shadow of themselves. Specially the foreign girls, a lot of them I see being used and abused. Pimps stealing their passports off them, and saying “you’re not getting your passport back, you work for me”. So actually owning them. I’ve seen that happen so many times.”</i> Cassie added that sauna managers kept up to 50% of the money punters paid the women, while pimps controlling indoor prostitution in Edinburgh in private flats take at least a 30% cut. When asked about the impact of her experience on her life, she explains: <i>“I see all men as pervs [...] because I’ve just been exposed to so much. Like men with wives, men with, you know... when you just think it could be the next guy that I date”</i></p> <p><b>‘Karen’</b> (not her real name) describes her experience of selling sex on-street at Leith Links as follows: <i>“You get a lot of residents shouting at you. One woman opens her window when I go past and screams ‘Dirty little hoor!’ [...] You don’t see many lasses</i></p>

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	<p>Encompass Network (2018): <a href="#">‘Preventing and eradicating prostitution: A proposed approach for Scotland’</a>.</p> <p>Geddes, C. (2022): <a href="#">New Zealand’s Reality</a>. Text of Chelsea Geddes’s speech in the morning session at the ‘Students for Sale: Tools for Resistance’ conference, held in London on 15 October 2022</p> <p>Hope, R. (2023): <a href="#">“Sex Work is Work”: What Progressive Feminists Get Right (And Wrong) About Decriminalising Prostitution</a>. <i>Evie Magazine</i></p>	<p><i>working around here now. People like me that take our chances. We don’t have much choice.”</i></p> <p><i>“I don’t think they should legalise it. No. Definitely no... Who wants that? Who thinks that’s a good idea? Legalising it all ain’t gonnae change what punters do. It’s no gonnae help the women. They need more security, safety nets around the surrounding areas for the girls fae prostitution. Cos there’s nae safety oot there whatsoever.”</i> Natalia, prostitution survivor.</p> <p><b>Chelsea</b> Geddes, a survivor from New Zealand, states that <i>“in New Zealand brothels, under decriminalisation, police can’t help anyone. The men can do absolutely anything short of killing someone and nothing will be done. I have gone to the police station after being punched in the head and concussed by a really large man who was verbally abusing a young girl in the lounge. She was sitting there looking terrified. I told him to leave her alone, he laughed and asked me “do you want to die?” so I took a step closer and said “Yes”. The police station was just around the corner from the brothel, so with my spinning head, I and a few of the girls walked over and told them about the attack. He had also stolen my purse. They didn’t do a single thing, just send us away, told me to look in the public rubbish bins to see if he’d thrown my purse in one”</i>.</p> <p><i>“I’m a prozzie myself, and I have never met another one who wants our pimps and johns to be decriminalised, or who wants to be made to pay tax on top of what the pimps already take, and to be given zero social services that help us to exit, rehabilitate ourselves, get an education or a real job for the future and instead it just be told it’s perfectly acceptable for us to stay right where we are. None of us want that, even those of us who are here by ‘choice’ because we</i></p>

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	<p>Encompass Network (2018): <a href="#">‘Preventing and eradicating prostitution: A proposed approach for Scotland’</a>.</p> <p>Valisce, S. (2017): <a href="#">My work as a prostitute led me to oppose decriminalisation</a>. BBC</p> <p>You, my sister: ‘Understanding the sex industries: a broad perspective’:</p>	<p><i>need the money. We all want it to be temporary. We would leave immediately if we could. Most of us [...] might support decriminalisation but only because we think the alternative is for us to be criminalised and arrested along with our abusers. Everyone who knows about the Nordic Model supports it. I would give my life to bring the Nordic Model to my country”.</i></p> <p><i>“I <b>would</b> make it against the law right across the board because, as I say, there’s no good in it. Everything is a negative. I would eradicate it. [...] I know everybody wouldn’t agree but if the men weren’t there looking, the women wouldn’t be there. If you stop a man who’s got a job, who’s got a family, they’re going to get into a lot more trouble than what the girl is gonnae. I think that’s the way to target it, target it through the men.”</i> Joanne, prostitution survivor</p> <p><b>Sabrina</b> Valisce, who sold sex in New Zealand both before and after the sex industry was completely decriminalised, spoke about her journey of entering the industry as a young girl while still at school. She subsequently discusses how decriminalisation let down all the people involved in the sex industry by normalising physical, sexual, emotional, financial and verbal abuse by both pimps, traffickers and sex buyers, while diminishing support and resources available to women who wished to exit the industry. She states, <i>“I thought it would give more power and rights to the women [...] but I soon realised the opposite was true”.</i></p> <p><i>The sex industry does not wait for women to approach. Recruitment into the sex industry is done through the scattering of traps and various types of coercion. From interviews I conducted with prostitution survivors [...] I identified several recurring mechanisms.</i></p>

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	<p>content delivered during a bespoke training session delivered by women with lived experience of the sex trade in Edinburgh on 6 December 2022</p>	<p><i>First, kidnappings and forced prostitution. We have, all over the world, parents who pimp their daughters, we have men who pimp their partners, wives, using coercion, threats, blackmail, physical force. We also have families who pimp daughters and wives in a 'soft' way. It means that the woman is not held by threats or beatings, but the family manipulates her and I see it a lot. The family convinces the woman that she alone can save everyone from starvation, from poverty.</i></p> <p><i>I have heard from many women of rape gangs that focus on girls, that they identify girls who have no supportive family, they gang rape them and when the girl is traumatised, ostracised, broken, sometimes thrown from the house, the gang traffics her. We have a wide system of 'lover boys': men whose job is to identify vulnerable women, build a grooming relationship with them, and then traffic women. Sometimes it works by manipulation, like, 'I help you so much, now you help me'. Sometimes they do it by threats, sometimes those lover boys bring women to a different country and just leave her in a brothel.</i></p> <p><i>Once you're involved in the sex industry, you'll quickly find that almost everyone else you know is either also in the industry or a buyer or consumer. This adds to the difficulty of exiting as you fear losing your main or only social network. You'll also be isolated due to trauma bonding and managing your different dissociated selves. The compassionate, pleasing one for buyers, and the fearful, disgusted self-loathing self which inhabits you the rest of the time. You will have been isolated from the rest of society due to stigma, both self-stigma and the stigma that is most strongly maintained against you by buyers and consumers who don't want to lose the free labour, emotional support and capital assets they enjoy, or the social status they have.</i></p>

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		<p><i>We organised a focus group with some of the women and these are some of the practical impacts of the sex industry. Prison records, medical records with notes about being involved in prostitution, children being taken into care, not being able to adopt or foster children because they have been involved in the sex industry, not being supported by services, they are de-skilled and need help with CV writing and need to learn life skills, job loss and being barred from certain professions due to their involvement in the sex industry, huge financial problems and, this statistic, 90% want to leave but they can't.</i></p> <p><i>Simply being objectified or objectifying yourself is harmful. It affects your own view of your self-worth and can have a serious impact on future relationships. Men who get involved with you after you've exited frequently, if they know your background, ask why you won't perform acts you were paid to perform when you're with them, if you really love them. Having sex in any form or having to express a sexual desire you do not possess constantly, with countless men, is harmful. The human psyche is not designed for this, so you dissociate and end up with a split persona, where you suppress real emotions and express emotions and arousal you don't feel. It's also why substance and alcohol use issues are normal across all forms of the sex industry. Dissociation can become associated with sex even after you exit. Denial and cognitive dissonance, that is, believing things you know are not true, are necessary survival mechanisms trauma bonding is common in the sex industry, as it is with domestic abuse and child sexual abuse. If you're an older woman involved in prostitution, many scenarios you will be asked to enact by men who pay you for sex or speak to you on premium rate phonelines are psychologically damaging re-enactments</i></p>

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	<p><a href="#">‘Inside/Outside: Voices and Images from women inside the sex industry in Scotland’</a> (exhibition co-produced and</p>	<p><i>of the childhood abuse carried out against the men themselves when they were boys. You realise this, because they tend to mention random details not found in porn scripts. They are reinforcing their own abuse and do so repeatedly.</i></p> <p><i>I was convinced I was going to be killed through acts of sexual violence, but I couldn’t see any alternative future because I had become so isolated. It took me several years after exiting to recognise the dissonance I was experiencing there.</i></p> <p><i>racism and classism in the sex trade influences both buyers and wider society. Buyers choose whether to buy you and how much to pay you based on racist and classist stereotypes. Your worth to them will be determined by your race, ethnicity, age, class background, proficiency in English, sexual orientation and other characteristics, many of which would put them at risk of discrimination proceedings under the Equality Act 2010, were they to take place in connection with the provision of any other service.</i></p> <p><i>You are as used to an item on the bucket list and you internalise this. You are described in discriminatory, misogynistic and degrading terms on porn websites, punter forums, reviews section of your profile on a commercial sex website and by punters in private. But this use of violent, misogynistic language by buyers is not considered a threat to wider society, in the ways words spoken by so-called ‘incels’ are, for example, even though these words accompany acts of violence or misogyny.</i></p> <p><i>“Some women will say it’s a job like any other job but no. It’s not really because, it’s very risky like, really risky. You can die any time because you don’t know who’s coming to your house. You can get any illness from the customer even if you protect yourself-you know? There can be a lot of danger. When you have a normal job, it’s not so much</i></p>

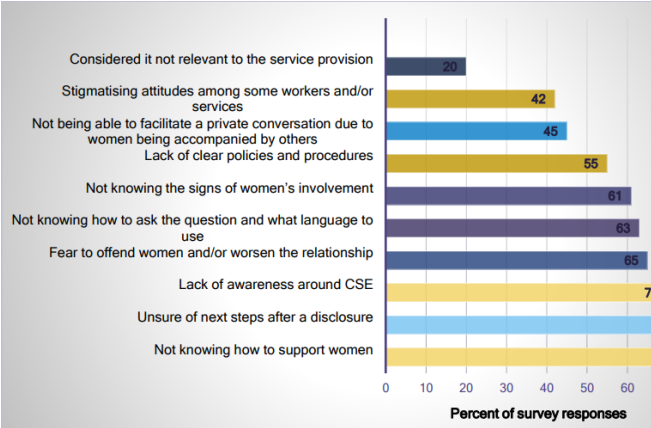


Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	featuring the lived experience of women in Scotland’s sex industry)	<p><i>danger involved in. So all the time I have to think, plan and know what I have to do to just make them customers leave.”</i></p> <p><i>“If a girl really wants to leave, give her something to concentrate on. Something concrete, a route out in a way. Not having a job to go to and not having a routine and not having money, and like, that’s the biggest pull to go back. It’s the practical help that’s really important.”</i></p> <p><i>“Girls aren’t out there because they like sex. They’re not out there because they’re nymphomaniacs. It’s a very lonely place, street prostitution, very lonely and very isolated.”</i></p>
Evidence of unmet need	Scottish Government, 2017: <a href="#">Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews</a>	<p>Research on prostitution in Scotland’s 4 largest cities:</p> <ul style="list-style-type: none"> <li>• There are no available robust data sources to tell us definitively about the women and men involved in prostitution, their backgrounds, different prostitution markets or the impact on health and wellbeing. There are however some limited data sources and reflections of professional support organisations and groups that provided us with views on our questions, and perceived changes in trends and evidence gaps. This is based on observations and reflections from professional practice.</li> <li>• there was concern from police and health workers that health and safety support services are less available for those involved in indoor prostitution, because they do not often use 'drop-in' services and are less easy to identify and promote/offer services to.</li> <li>• Information about personal health and wellbeing impact was based on the professional insights of those that come into contact with people involved</li> </ul>



Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>in prostitution through the criminal justice system (police and social work) or through the provision of support and key services (third sector specialist and NHS). This may therefore only present a partial picture of those who require or have sought particular kinds of support or assistance.</p> <ul style="list-style-type: none"> <li>• There were perceptions among police respondents that experiences of violence and sexual victimisation were common for this group of people, but also that rates of reported crime were low compared with the real risk of victimisation. This was perceived to be pronounced for reported crime in relation to the off-street industry. Police Scotland therefore recognises the need to work collaboratively with health and other partners to encourage reporting, particularly among harder to reach groups.</li> <li>• Less 'visibility' of off-street workers was also highlighted in relation to male prostitution, where it has become more challenging to reach those involved and get safe sex messages across. It was suggested that those involved in prostitution may therefore be at increased risk of mental and physical harm.</li> <li>• The shift from outdoor to indoor prostitution has posed a number of challenges for service delivery. In some locations this has led to the reduction or closure of night time 'drop-in' services, and new ways of working. This has also led to the need for promotion of services to a potentially new group of service users, for example through pro-active engagement with the people who advertise sexual services online.</li> <li>• A range of barriers to exit for people who wanted to leave were identified</li> </ul>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>You, my sister: 'Understanding the sex industries: a broad perspective': content delivered during a bespoke training session delivered by women with lived experience of the sex trade in Edinburgh on 6 December 2022</p>	<p>including poverty, few alternatives for making money, prolonged involvement in prostitution, continued alcohol and/or drug misuse to manage or block out painful emotions due to the impact of trauma, having a criminal record and informal coercion (from a partner or family member).</p> <ul style="list-style-type: none"> <li>• more could be done with regards to prevention to stop women becoming involved in prostitution in the first instance, as well as to halt the escalation of problems.</li> <li>• Other gaps identified were in terms of mainstream services and flexibility of support available as well as a general lack of understanding of the issues (among some professionals and practitioners) faced by those in prostitution.</li> <li>• Further gaps identified included the involvement of women and men involved in prostitution as key partners in the delivery of key services affecting them.</li> </ul> <p><i>“People that were trying to exit the industry, they need to have specialist support services that deal specifically with the issues that these women are facing. You know there’s- in the UK you’ve got hundreds and millions of services out there that deal with different things, which isn’t always helpful for one vulnerable woman. It would be more helpful to have one organisation that deals with all of these women or deals with that specific woman on behalf of all the other agencies. So that one woman isn’t having to deal with sixty different companies explaining her story 60 different times, trusting 60 different people. So I think it would be more beneficial if services all linked up together and helped that one person with just one person so that she can build that trust. And this is what came out of our focus group with all the women together and they discussed very</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal																						
	<p><a href="#">‘Inside/Outside: Voices and Images from women inside the sex industry in Scotland’</a> (exhibition co-produced and featuring the lived experience of women in Scotland’s sex industry)</p> <p>CSE Aware &amp; the Women’s Support Project (2024): <a href="#">Barriers to disclosure of selling or exchanging sex: Service Providers’ perspectives</a></p>	<p><i>heavily about what they believed they need so I wanted to answer that question with their responses.”</i></p> <p><i>“If a girl really wants to leave, give her something to concentrate on. Something concrete, a route out in a way. Not having a job to go to and not having a routine and not having money, and like, that’s the biggest pull to go back. It’s the practical help that’s really important.”</i></p> <p>Most common barriers for workers in facilitating disclosures of selling or exchanging sex:</p> <ul style="list-style-type: none"> <li>- Not knowing how to support women in relation to their involvement (79%)</li> <li>- Unsure of next steps after a disclosure (73%)</li> <li>- Lack of awareness around CSE (70%)</li> </ul>  <table border="1"> <caption>Barriers to disclosure of selling or exchanging sex</caption> <thead> <tr> <th>Barrier</th> <th>Percent of survey responses</th> </tr> </thead> <tbody> <tr> <td>Considered it not relevant to the service provision</td> <td>20</td> </tr> <tr> <td>Stigmatising attitudes among some workers and/or services</td> <td>42</td> </tr> <tr> <td>Not being able to facilitate a private conversation due to women being accompanied by others</td> <td>45</td> </tr> <tr> <td>Lack of clear policies and procedures</td> <td>55</td> </tr> <tr> <td>Not knowing the signs of women’s involvement</td> <td>61</td> </tr> <tr> <td>Not knowing how to ask the question and what language to use</td> <td>63</td> </tr> <tr> <td>Fear to offend women and/or worsen the relationship</td> <td>65</td> </tr> <tr> <td>Lack of awareness around CSE</td> <td>70</td> </tr> <tr> <td>Unsure of next steps after a disclosure</td> <td>73</td> </tr> <tr> <td>Not knowing how to support women</td> <td>79</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>- Understanding pressures such as county lines, domestic abuse and addiction</li> <li>- Preconceived ideas about the woman’s situation – need to not make assumptions and challenge their own biases</li> </ul>	Barrier	Percent of survey responses	Considered it not relevant to the service provision	20	Stigmatising attitudes among some workers and/or services	42	Not being able to facilitate a private conversation due to women being accompanied by others	45	Lack of clear policies and procedures	55	Not knowing the signs of women’s involvement	61	Not knowing how to ask the question and what language to use	63	Fear to offend women and/or worsen the relationship	65	Lack of awareness around CSE	70	Unsure of next steps after a disclosure	73	Not knowing how to support women	79
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	<p>CSE Aware (2024): <a href="#">The needs of women who sell or exchange sex: A briefing for elected representatives in Scotland.</a></p>	<ul style="list-style-type: none"> <li>- Lack of resources, particularly for young people involved</li> <li>- Lack of available resources for women with learning disabilities</li> <li>- Lack of specialist services</li> <li>- Not sure of how to respond to women who are migrants, from ethnic minority backgrounds, who have a criminal record or mental health issues.</li> <li>- Questions around CSE not included in service intake documentation</li> <li>- The political nature of the issue not only acts as a barrier to women disclosing and to workers asking questions, but it also causes confusion around how workers are expected to respond to a disclosure.</li> <li>- Confusion over the legal standing of CSE</li> <li>- Workers have stated that they would benefit from more training on how to ask about, and respond to, disclosures of CSE.</li> <li>- Workers also called for better awareness and availability of specialist CSE services, especially support for exiting.</li> <li>- Clarity over evidence-based exiting supports and mechanisms for women affected by CSE.</li> <li>- Policies and procedures around CSE and how to respond to disclosures</li> </ul> <p>Housing:</p> <ul style="list-style-type: none"> <li>- 62% of women affected by CSE had been homeless at some point in their lives and 70% needed help with housing.</li> </ul> <p>Safety:</p> <ul style="list-style-type: none"> <li>- 78% of women affected by CSE had experienced violence due to their involvement</li> <li>- 58% had experienced domestic abuse</li> </ul> <p>Mental health:</p> <ul style="list-style-type: none"> <li>- 91% of women affected by CSE had disclosed a mental health issue, including trauma symptoms</li> </ul> <p>Trauma-Informed Support:</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<ul style="list-style-type: none"> <li>- 60.7% of women affected by CSE disclosed prior suicide attempts</li> </ul> <p>Substance use:</p> <ul style="list-style-type: none"> <li>- 50% of women became involved in selling sex after developing a drug dependency</li> <li>- 80.6% of women increased their drug taking when they started selling sex</li> </ul> <p>Sexual wellbeing:</p> <ul style="list-style-type: none"> <li>- 46% of women had experienced condom removal/refusal</li> </ul> <p>Money and poverty:</p> <ul style="list-style-type: none"> <li>- 89% of women were struggling to cover food, energy and housing costs</li> <li>- 46% needed support with debt</li> </ul> <p>Criminal Justice:</p> <ul style="list-style-type: none"> <li>- 40% of women had disclosed having a criminal conviction (for shoplifting, assault, theft, etc.)</li> <li>- Out of 1,512 violent crimes against women selling sex, only 10 were reported to the police (less than 1%)</li> </ul>
Good practice guidelines	<a href="#">Home Office: A review of Effective Practice in Responding to Prostitution (2011)</a>	<p>Evidence from visits to 14 areas and consultation with experts in the field have consistently shown the following key elements of a successful strategy for responding to prostitution and keeping those involved safe:</p> <ul style="list-style-type: none"> <li>• Taking account of the concerns of a broad range of constituencies, which includes local residents, statutory and voluntary sector agencies, as well as the people involved in prostitution themselves;</li> <li>• A multi-agency approach, with as many relevant agencies involved as possible including relevant specialist services, is important to tackle the range of complex needs and issues that around prostitution;</li> <li>• Considering prevention, particularly with regards to identifying and preventing sexual exploitation of children;</li> <li>• Comprehensively mapping an area to identify a set of multiple and complex needs and issues to address. The safety of those involved in prostitution is a</li> </ul>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
		<p>priority, alongside a wider range of support;</p> <ul style="list-style-type: none"> <li>• Local “Ugly Mugs” or “Dodgy Punter” schemes can help improve safety by allowing people involved in prostitution to report incidents of violence, which can then enable 5 information about dangerous individuals to be disseminated to others or be used to report a crime to the police for investigation;</li> <li>• The police’s responsibility for public protection means that stopping attacks on those involved in prostitution, and catching and convicting those responsible, is a core part of reducing the harm from prostitution;</li> <li>• Increasing the confidence of those involved in prostitution to report crimes to the police. This can involve working with sex work support projects to communicate the message that crimes against those involved in prostitution will be taken seriously;</li> <li>• The availability of an Independent Sexual Violence Advisor (ISVA) or the services of a Sexual Assault Referral Centre (SARC) or a Rape Crisis Centre can make an important contribution to safety. A number of areas have developed a partnership with a SARC to ensure that those involved in prostitution who have suffered a serious sexual assault can access the appropriate services;</li> <li>• Outreach is an effective way of achieving an initial engagement or awareness with individuals which can then lead to more sustained engagement;</li> <li>• Individuals involved in prostitution are likely to have a wide and diverse range of needs that require addressing.</li> <li>• Housing was identified as a particularly important issue for those seeking to stabilise their lives and to exit prostitution and to cease drug use;</li> </ul>

Evidence	Available – detail source	<b>Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal</b>
	<p>Crown Prosecution Service:  <a href="#">Prostitution and Exploitation of</a></p>	<ul style="list-style-type: none"> <li>Ongoing monitoring can help ensure that appropriate standards are being upheld, that local objectives are being met, and that no adverse impacts are arising. Evaluation can also help maximise value for money of interventions and support.</li> </ul> <p>A response to prostitution should start by assessing the characteristics of prostitution within that area, and to identify the locations and communities whose needs should be addressed (including people involved in prostitution and local residents). This can identify which agencies need to be involved, where the response needs to be targeted, and how support will need to be delivered to address the community’s needs. An independent mapping process can help ensure that the results do not simply reflect the client base of existing services, and that they properly reflect the range of needs of people in street and off-street prostitution, and including men, transgender people, migrants, and sexually exploited children.</p> <p>It is also important to adopt appropriate partnership structures to sustain this involvement and to ensure that each agency is contributing effectively and working to agreed terms of reference, objectives, and outcome measures. These can be informed by the findings of comprehensive mapping. Whatever the outcome of mapping and whatever priorities are identified, multi-agency partnerships will need to adhere to their duty of care for all citizens and their responsibility for public protection, including the public safety and protection of people involved in prostitution.</p> <p><b>When</b> considering charging, in addition to the public interest factors set out in the <u>Code for Crown Prosecutors</u>, the following public interest aims and considerations should be borne in mind:</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p data-bbox="480 344 647 416"><a href="#">Prostitution</a> (2019)</p> <p data-bbox="480 1447 708 1845">Scottish Government, 2017: <a href="#">Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews</a></p>	<ul data-bbox="786 344 1390 1043" style="list-style-type: none"> <li>• Those who sell sex should not be routinely prosecuted as offenders. The emphasis should be to encourage them to engage with support services and to find routes out of prostitution.</li> <li>• Diversionary approaches should be prioritised over enforcement of offences under the Policing and Crime Act 2009, which should only be used as part of a staged approach that includes warnings and cautions.</li> <li>• It will generally be in the public interest to prosecute those who abuse, harm, exploit, or make a living from the earnings of prostitutes.</li> <li>• Generally, the more serious the incident and previous offending history, the more likely it is that a prosecution will be required.</li> </ul> <p data-bbox="735 1048 1390 1406">There is a strong public interest in prosecuting violent crimes against those who sell sex. In circumstances where a person who sells sex has reported a criminal offence and decided to support a prosecution, special measures should be considered at the earliest opportunity to give them the necessary support and confidence to provide evidence, including through the use of ABE interviews.</p> <p data-bbox="735 1451 986 1485">Current Priorities:</p> <ul data-bbox="786 1489 1369 1888" style="list-style-type: none"> <li>- Policing: focus on protecting communities and individuals from threat, risk, harm, exploitation, investigating people who abuse, exploit or coerce, working in partnership with harm-reduction practitioners and supporting research and debate with policymakers.</li> <li>- Strong recognition of the importance of partnership working between agencies</li> </ul>
Carbon emissions	Not applicable	Not applicable



Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
generated/reduced data		
Environmental data	<p data-bbox="480 421 711 707">Brown, A. (2022): <a href="#">‘Strip club campaign is about filthy cash-not women’s rights’</a>. <i>Daily Record</i></p> <p data-bbox="480 748 711 1115">SEV licensing consultation, Autumn 2022; report to the <a href="#">Regulatory Committee dated Thursday 2 December 2021 (Appendix 6)</a></p>	<p data-bbox="737 421 1388 600">Edinburgh has been hailed as having a reputation for a thriving sex industry similar to Amsterdam’s. This has an impact on the city’s culture as the behaviour of ‘sex tourists’ can be inappropriate or intimidating.</p> <p data-bbox="737 748 1385 891">Edinburgh residents who voted in favour of a nil cap on licenses responded on the basis of the impact SEVs have on the local community:</p> <p data-bbox="737 931 1385 1223"><i>‘These places devalue the area in which they operate. They attract people of unfavourable character as both legal and illegal operations are associated with the type of people who would frequent an establishment which has a lap dance. A lap dance would be the appetiser for a much more destructive and unhealthy interaction for society’.</i></p> <p data-bbox="737 1263 1385 1630"><i>‘I absolutely hate seeing these venues in the city and I think it really ruins the tone of the city which is an historic and welcoming city for tourists. I think the council should adopt a strong stance against sexual entertainment as it continues to support an unhealthy sexual view of women in society. A policy is required to enable the council to prevent these establishments from operating in the city area at all.’</i></p> <p data-bbox="737 1671 1385 2020"><i>‘Closing SEV venues will only drive the industry underground and therefore put workers at risk and loss of jobs, also causing workers into more dangerous jobs in order to make ends meet. The clubs operate under strict working conditions in order to keep everyone safe and happy. As a dancer of 6 year, I can strongly argue I have always been genuinely safer in a lap dancing club than I am fully clothed in a nightclub. As security</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p><i>guards, cameras and management support measures are firmly in place to ensure our safety and well-being at all times. While nightclubs also offer cctv and security, harassment is never taken seriously by security and staff and is usually dismissed as “that’s just the way it is” approach. Lap dancing allows workers a safe comfortable and flexible place of work with better support options than most “normal” jobs despite being stricter. Closing clubs or limiting sex venues to 0 would only put workers at risk.’</i></p> <p><i>‘Where these premises exist, prostitution is encouraged. Children and girls are taught that their self worth is only in sex. Men in these areas treat all women and girls as being for sale or their use and not as people’.</i></p> <p><i>‘I strongly disagree with any move to set limits at nil. Sex workers should be able to go about their lawful business without the judgment of the council. SEV’s are often much safer for these workers than alternative locations. This city has a fairly progressive record in these matters regarding the tolerance zones, which were sadly ended by Police Scotland, we should return to that evidence based empowerment model rather than moralisation’</i></p> <p><i>‘There should be an acknowledgement that concentrating these premises in central areas does mean other businesses may seek to locate elsewhere and that tourists, other than those interested in such premises, will not want to stay in these areas. A good reason to limit them. Massage parlours and/or saunas should also be tightly regulated. Students, particularly females, will not want to frequent areas where sex clubs are located because these will be perceived as unsafe. Sexual harassment of young females in the city is already a problem (ask the student associations/unions). They should not be near purpose-built student</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	<p>Women’s Safety in Public Places Consultation, Summer 2022. Presented in the <a href="#">report to the Regulatory Committee on 5 February 2024 – appendix 6.</a></p>	<p><i>accommodation. Edinburgh should be a family friendly city where women feel safe. This should be the main focus of your policy.’</i></p> <p><b>Comments</b> made by consultees on the impact of SEVs in the surrounding environment/community included the following:</p> <p><i>“Pubic Triangle lap dancing/strip bars. [I’m] aware that men congregate here to objectivise women, attend ‘performances to get fired up but not ‘satisfied’ as they would in a brothel.”</i></p> <p><i>“Sexual harassment guaranteed if walking here at night.”</i></p> <p><i>“People hanging around in this area. Lots of men walking here.”</i></p> <p><i>“Strip clubs and those who hang around them.”</i></p> <p><i>“The lap dancing clubs at night make this place feel very unsafe. Big groups of men on stag nights.”</i></p> <p><i>“Narrow pavements with guard rails mean it is sometimes difficult to get away from uncomfortable, possibly dangerous situations.”</i></p> <p><i>“Walking past the strip clubs is horrible. Getting cat called, groped and followed by drunk men who feel somehow entitled to this behaviour after watching women stripping for them. It’s disgusting, backwards and this should not be happening in Edinburgh!”</i></p> <p><i>“Groups of men often under the influence of alcohol gathering and loitering around sexual entertainment venues. Loud behaviour, calling names and making comments about women passing by. Often these have sexual</i></p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<i>connotations and make women feel that they are at risk of sexual or other assault.”</i>
Risk from cumulative impacts	<p>Crown Prosecution Service: <a href="#">Prostitution and Exploitation of Prostitution</a> (2019)</p> <p>Jeffreys, S. (2008):</p>	<p>There can be strong links between prostitution and problematic substance (drug and alcohol) use, on a number of levels. For example, such usage can be a coping mechanism for people involved in prostitution. For others, it can be an addiction funded by the prostitution itself. On the other side of the spectrum, it can be a method to embroil and coerce another into prostitution. Other vulnerabilities of those who sell sex may include mental illness and depression, homelessness or vulnerable housing status, domestic abuse and previous experience of the criminal justice system. Suitable cases should be dealt with by means of diversion from the criminal justice system, with referral to special exiting and outreach support. This would include mental health support, benefits advice, education, training and employment support, drug and alcohol services, health services and domestic abuse services.</p> <p>Human trafficking is a lucrative business and is often linked with other organised crime within the sex industry, covering criminal activities such as immigration crime, violence, drug abuse and money laundering. Victims may be targeted for sexual exploitation because of their immigration status, economic situation or other vulnerabilities.</p> <p>Those who sell sex are often targets of violent crime, which can include physical and sexual attacks, including rape. Evidence suggests that offenders deliberately target those who sell sex because they believe they will not report the crime to the police. Perpetrators of such offences can include clients or pimps.</p> <p>Women with disabilities affected by CSE are raped and abuse at least twice the rate of</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	Disability and the male sex right. <i>Women’s Studies International Forum</i> 31(5), pp.327 335.	women without disabilities and are yet less likely to receive support from services after experiencing violence.
Other (please specify)	Not applicable	Not applicable
Additional evidence required	Not applicable	Not applicable

**8. In summary, what impacts were identified, and which groups will they affect?**

Equality, Health and Wellbeing and Human Rights	Affected populations
<p><b>Positive</b></p> <p>The Position Statement and its accompanying Briefing Paper applies to all people involved in the sex industry. This helps to protect children and young people from grooming and exploitation, while service provision will help to support people in their middle and older years as prior involvement in the sex industry is extremely traumatic with lifelong implications. This is particularly true for girls and women who form the majority of people affected.</p> <p>The Position Statement further reduces potential risks and impacts and consolidates the Equally Safe position that CSE is a form of VAWG. It recognises the added vulnerabilities, barriers and challenges faced by people with additional/ protected characteristics, particularly race, disability, age, and transgender status. It further helps to prevent people developing disabilities and long-term conditions in terms of physical and mental health as a result of involvement in CSE. It is also beneficial for men in de-normalising the purchase of sex and sexual services, therefore leading to more egalitarian attitudes and improved gender relations – especially given that almost half (47%) of sex buyers are married men.</p> <p>Committing to providing services is positive as they can provide expert support to people affected by CSE. There is a further recognition that different forms of VAWG are interrelated, and that people can resort to CSE due to other forms of violence. This includes domestic, sexual or other forms of abuse in childhood, or experience of being in care as a child or young person. As a result, investing in services can raise awareness of specific needs; help professionals understand vulnerability; and prevent intergenerational trauma faced by children of women who became involved in CSE following childhood abuse.</p> <p>The recognition of the particular needs of marginalised groups where control and coercion can look different than for more dominant groups. For example, LGBT people can be controlled through threats of being</p>	<ul style="list-style-type: none"> <li>• People with protected characteristics (age, disability, religion/belief, sex, gender reassignment, pregnancy/maternity, marital status, sexual orientation, race)</li> <li>• Care experienced children and young people</li> <li>• People at risk of/who have experienced human trafficking/ modern slavery</li> <li>• People at risk of falling into poverty</li> <li>• People from backgrounds with high level of material deprivation (in the UK or overseas)</li> <li>• People with No Recourse to Public Funds</li> <li>• Care experienced (children and young) people</li> <li>• People experiencing/ at risk of homelessness</li> <li>• Students and international students</li> <li>• People experiencing challenges with substance use</li> </ul>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>'outed' while neurodiverse people are at higher risk of manipulation, coercion and grooming.</p> <p>The Statement also applies to people who may resort to CSE as a result of poverty, homelessness or other vulnerability (such as No Recourse to Public Funds for example). Students are often particularly targeted by trafficking/pimping groups.</p> <p>Strong statements against the sex industry have shown to have a positive impact over time, with Nordic model countries showing a steady shift of public opinion towards more egalitarian attitudes over time.</p> <p>The Position Statement recognises that the push into the sex industry is not just about poverty, disadvantage and substance use; it also recognises that the sex industry and its supporters capitalise on the psycho-social-sexual grooming of young women by mainstream sexualised culture.</p> <p>This position statement will enable Edinburgh to fulfil one more of its Equally Safe performance criteria: <i>“The local authority has a clear position statement in place that recognises CSE (including prostitution, lap dancing, stripping, pornography and trafficking) as a form of VAWG and notes its commitment to promoting the safety and wellbeing of women involved in selling or exchanging sex.”</i></p> <p>The Statement can further act as a deterrent for people of all ages to consider the sex industry as a viable career option.</p> <p>Pushing for the closure of saunas and Sexual Entertainment Venues can make parts of Edinburgh where they are currently located more welcoming towards women and girls who often self-exclude from such areas. These premises can also be used for alternative purposes, leading to rejuvenation of specific areas and an economic boost. Their closure can further prevent the normalisation of prostitution and sexual entertainment.</p> <p>The sex industry is seen as glamorous, flexible and liberating, giving people the freedom to choose when, where and how they work. However, a lot of this choice is an illusion as many crimes against people (especially</p>	<ul style="list-style-type: none"> <li>• Urban, rural, semi-rural and coastal communities</li> <li>• Business community</li> <li>• People in full/part-time/ shift-based employment</li> <li>• Staff with protected characteristics</li> <li>• Carers</li> <li>• People who are employed (full time, part time or shift work)</li> <li>• People who are unemployed</li> </ul>

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>women) in the sex industry go unreported, and there is no awareness of the huge overheads involved in the attempt to become 'successful' in the sex industry.</p>	
<p><b>Negative</b></p> <p>There are ongoing concerns that making a strong statement against the sex industry can push it 'underground'. There is strong evidence that this is not the case as the sex industry is already 'underground' (there is no protection for women selling/exchanging sex; exploitation by pimps/sauna/SEV owners; strong links to serious organised crime, etc.)</p> <p>Some sex buyers with disabilities argue that if they are unable to pay for sex then they may be unable to have sex altogether, therefore affecting their overall wellbeing. The same applies for men (who form the overwhelming majority of people who pay for sex and sexual services) who might believe that they have a right to pay for sex, sexual entertainment and sexual services.</p> <p>The Position Statement and Briefing Paper clearly demonstrate the many vulnerabilities that push women and girls towards the sex industry. However, although the Position Statement commits to improved service delivery, there are concerns as to whether services have the knowledge, capacity or expertise to help people in the sex industry, particularly given that they may often present with multiple complex and intersecting needs.</p> <p>The sex industry might be the only source of income for some people, particularly women with no recourse to public funds, women in abusive relationships or those with drug and alcohol issues. If this is no longer available, then a section of the population might become destitute or resort to extremely dangerous practices or living arrangements in order to survive.</p> <p>People (particularly men) who pay for sex have been shown to be more likely to sexually or intimately abuse their partners. Many believe in 'rape myths' and see prostitution as an outlet for violence and abuse, or a platform where they can act out fantasies that they cannot act out with a long-term partner or spouse. It is</p>	<ul style="list-style-type: none"> <li>• People with protected characteristics (age, disability, religion/belief, sex, gender reassignment, pregnancy/maternity, marital status, sexual orientation, race)</li> <li>• Care experienced children and young people</li> <li>• People at risk of/who have experienced human trafficking/modern slavery</li> <li>• People at risk of falling into poverty</li> <li>• People from backgrounds with high level of material deprivation (in the UK or overseas)</li> <li>• People with No Recourse to Public Funds</li> <li>• Care experienced (children and young) people</li> <li>• People experiencing/at risk of homelessness</li> <li>• Students and international students</li> <li>• People experiencing challenges with substance use</li> </ul>



<b>Equality, Health and Wellbeing and Human Rights</b>	<b>Affected populations</b>
<p>possible that if a sex industry is not present, there may be increased reports of domestic abuse and sexual violence in intimate relationships.</p> <p>There is a recognition that there is a lot of stigma and prejudice towards women who sell/exchange sex and sexual entertainment across services and society as a whole. As a result, by encouraging and supporting women to access services, it is possible that this stigma might lead professionals to view them as ‘unfit parents or carers’, if this is included in the records of any statutory support they receive.</p> <p>Substance misuse can be both a cause and consequence of CSE and any specialist support services need to provide long-term appropriate support around this. Support also needs to include financial support, especially for people who make significant earnings as a result of selling sex and sexual entertainment and content. Edinburgh currently does not have the infrastructure to support this and it will take considerable time until this is possible.</p> <p>There is strong evidence as to the harms of the sex industry, however the Position Statement does not provide any incentives to prevent men from buying sex and sexual services. It further does not address the (most often) men who benefit from the prostitution of women (pimps, sauna owners). Similarly there are no interventions currently available in Edinburgh to dissuade men from buying sex, which would be missing out on a significant part of the equation.</p> <p>The Position Statement is currently at odds with current policy which allows the licensing of saunas and sexual entertainment venues. Some people work in the sex industry to supplement their income. Without the sex industry they may be more vulnerable to poverty.</p>	<ul style="list-style-type: none"> <li>• Urban, rural, semi-rural and coastal communities</li> <li>• Business community</li> <li>• People in full/part-time/ shift-based employment</li> <li>• Staff with protected characteristics</li> <li>• Carers</li> <li>• People who are employed (full time, part time or shift work)</li> <li>• People who are unemployed</li> </ul>

<b>Environment and Sustainability including climate change emissions and impacts</b>	<b>Affected populations</b>
<p><b>Positive</b></p> <p>No environmental impacts have been identified as a result of introducing a Position Statement and Briefing Paper on CSE</p>	

<b>Environment and Sustainability including climate change emissions and impacts</b>	<b>Affected populations</b>
<b>Negative</b>	
No environmental impacts have been identified as a result of introducing a Position Statement and Briefing Paper on CSE	

<b>Economic</b>	<b>Affected populations</b>
<b>Positive</b>	
<p>The sex industry has a huge economic impact in Scotland, with all forms of VAWG costing the Scottish public purse £4.2 billion per year. The sex industry’s association with serious organised crime, particularly human and drug trafficking groups requires considerable resources to address. Taking steps to eradicate it would lead to significant savings that could go towards positive social change and support for people in need.</p> <p>Poverty is both a cause and consequence of CSE. Supporting people to exit the sex industry or, preferably, not to enter in the first place will benefit them economically in significant ways and will prevent public funds being required to address the impact of CSE (health, mental health, police, etc.)</p> <p>Supporting and developing specialist services to recognise and respond to CSE means that people (especially women and girls) will be less likely to fall into poverty as a result of their involvement in the sex industry. Services can also help women and girls towards more positive life destinations by supporting them to stay in/access education, training, volunteering and employment opportunities that can improve their employability and enabling them to make a living without involvement in CSE.</p> <p>By reducing demand for prostitution or other aspects of the sex industry, it is possible that in the long run there may no longer be establishments where sex and sexual entertainment may be purchased. As a result, areas where such venues are currently located may close, enabling the opening of new businesses, attracting</p>	<ul style="list-style-type: none"> <li>• People with protected characteristics (age, disability, religion/belief, sex, gender reassignment, pregnancy/maternity, marital status, sexual orientation, race)</li> <li>• Care experienced children and young people</li> <li>• People at risk of/who have experienced human trafficking/modern slavery</li> <li>• People at risk of falling into poverty</li> <li>• People from backgrounds with high level of material deprivation (in the UK or overseas)</li> <li>• People with No Recourse to Public Funds</li> <li>• Care experienced (children and young) people</li> <li>• People experiencing/at risk of homelessness</li> </ul>

<b>Economic</b>	<b>Affected populations</b>
<p>investment and changing the profile of particular areas, possibly even having a positive impact on property prices and the overall appeal of those areas.</p> <p>By recognising CSE as a form of VAWG, we can make a societal and attitudinal shift towards eradicating the stigma associated with engagement in the sex industry. By understanding CSE as abusive and exploitative, the support provided to those affected can be more inclusive, and future employment, training and education opportunities not influenced by people’s prior involvement in the sex industry.</p>	<ul style="list-style-type: none"> <li>• Students and international students</li> <li>• People experiencing challenges with substance use</li> <li>• Urban, rural, semi-rural and coastal communities</li> <li>• Business community</li> <li>• People in full/part-time/ shift-based employment</li> <li>• Staff with protected characteristics</li> <li>• Carers</li> <li>• People who are employed (full time, part time or shift work)</li> <li>• People who are unemployed</li> </ul>
<p><b>Negative</b></p> <p>Support for people to enable them to live independently without resorting to the sex industry, or to help them to exit the sex industry, needs to be long term. It also needs to be well-resourced and to include financial support, as the current system involves a lengthy wait until benefits can be awarded. Further, given the prevalence of housing issues affecting women in the sex industry, housing is a very pertinent need.</p> <p>There is currently no infrastructure available to support people affected by the sex industry in Edinburgh given the current financial and housing crisis.</p> <p>A number of businesses and nighttime economy venues rely on revenue from the sex industry at the moment. Without the sex industry, it is possible that the income of such businesses will be negatively impacted.</p> <p>For many people who do not/cannot access benefits, including people with no recourse to public funds, the sex industry might be the only way to earn money. In the absence of the sex industry, it is possible that these</p>	<ul style="list-style-type: none"> <li>• People with protected characteristics (age, disability, religion/belief, sex, gender reassignment, pregnancy/maternity, marital status, sexual orientation, race)</li> <li>• Care experienced children and young people</li> <li>• People at risk of/who have experienced human trafficking/modern slavery</li> <li>• People at risk of falling into poverty</li> <li>• People from backgrounds with high level of material</li> </ul>

Economic	Affected populations
<p>groups might not be able to afford a living, leaving them destitute without daily life essentials.</p>	<p>deprivation (in the UK or overseas)</p> <ul style="list-style-type: none"> <li>• People with No Recourse to Public Funds</li> <li>• Care experienced (children and young) people</li> <li>• People experiencing/ at risk of homelessness</li> <li>• Students and international students</li> <li>• People experiencing challenges with substance use</li> <li>• Urban, rural, semi-rural and coastal communities</li> <li>• Business community</li> <li>• People in full/part-time/ shift-based employment</li> <li>• Staff with protected characteristics</li> <li>• Carers</li> <li>• People who are employed (full time, part time or shift work)</li> <li>• People who are unemployed</li> </ul>

**9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

It is expected that all services operating in Edinburgh will adopt this position statement and work towards service improvement to respond to the needs of people affected by CSE. Services commissioned by the City of Edinburgh Council are already members of the ESEC and adhere to the principles of Equally Safe, therefore already operating from the perspective outlined in the CSE Position Statement.

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

This position statement can be provided in different languages and formats upon request.

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

Not applicable

**12. Additional Information and Evidence Required**

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

None required.

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

<b>Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)</b>	<b>Who will take them forward (name and job title)</b>	<b>Deadline for progressing</b>	<b>Review date</b>

#### **14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

Although section 8 identifies a number of potential negative impacts, the ESEC supports that the changes proposed through the introduction of a CSE position statement will be overwhelmingly positive in the long run. This includes promoting gender equality, reducing instances of VAWG, preventing the exploitation of people through prostitution, pimping, trafficking and sexual violence and improving services to be able to respond to the needs of people affected by CSE.

#### **15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

The ESEC will monitor the impact of this proposal through service updates from its member organisations and feedback from the National Violence Against Women Network and the Scottish Government. The ESEC has also recently created a 'CSE Practitioners' Forum' with representatives from a number of organisations who wish to improve their practice and their services to better respond to the needs of people affected by CSE. Their feedback on progress will support the monitoring of the impact of the CSE Position Statement.

#### **16. Sign off by Head of Service**

**Name:** Rose Howley

**Date:** 08/08/2024

#### **17. Publication**

Completed and signed IIAs should be sent to:  
[integratedimpactassessments@edinburgh.gov.uk](mailto:integratedimpactassessments@edinburgh.gov.uk) to be published on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)  
**Edinburgh Integration Joint Board/Health and Social Care**  
[sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published at  
[www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/](http://www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/)