




Ending all forms of violence against sex workers


Principles:

- ◆ Sex Workers First
- ◆ Quality Support
- ◆ Learning and Innovation

"Thank you so much for being the organisation you are. To know we are not alone and supported means everything. I remember, back in the day, NUM's alerts were photocopies delivered to the walk up flats in London, that was 30+ years ago and you are still going and getting stronger. I feel so much safer knowing NUM exists and is so accessible. Thank you for all you do."

- NUM Member

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Charity no. 112246

Audrey Nicoll MSP
Convener, Criminal Justice Committee
The Scottish Parliament
Edinburgh
EH99 1SP

October 15, 2025

By email : justice.committee@parliament.scot

Prostitution (Offences and Support) (Scotland) Bill

Dear Convener,

Thank you for the opportunity to provide oral evidence in relation to the above Bill.

During the session I committed to providing the committee with further information about a number of subject areas. I have covered the various issues below, and am happy to answer any further questions the committee may have.

To recap, NUM is the UK's national sex worker safety charity, supporting around 9,000 sex worker members across the UK. We directly support 600 sex workers in Scotland, via our NUMbrella Lane drop-in centre in Glasgow (as well as providing remote casework, and mental health and vocational support), which makes us the largest sex-worker serving organisation in Scotland.

In line with all groups representing and serving sex workers, we strongly oppose the proposal to criminalise the purchase of sex, as international evidence shows it only serves to drive the sector underground and increase harm to sex workers, while failing to reduce demand for sexual services.

We were disappointed to hear some members of the committee suggest during the session that criminalising sex-buying would have the benefit of "sending a message" to Scottish society that purchasing sexual services is exploitative and wrong. We would caution that while this may sound symbolically attractive to those less familiar with the realities of the sector, it would have tangible and harmful impacts for those who wake up every morning needing to decide whether to engage in sex work that day to heat their home, pay their bills, or feed and clothe their children.

Nature and make-up of the sector

It is a widely accepted that there is no reliable source of population data for those providing sexual services for money in Scotland or the wider UK, with researchers citing the stigma that sex workers face and the private and hidden nature of the sector as key barriers to establishing robust data.

0161 629 9861

admin@nationaluglymugs.org

209 Green Fish Resource Centre,
46-50 Oldham Street, Manchester, M4 1LE

Those who wish to criminalise the purchase of sex seek to present the sector as almost exclusively consisting of trafficked and exploited women. While trafficking and exploitation undoubtedly does occur, those claims do not align with either the available evidence, or the frontline experience of groups like NUM.

An assessment of the nature of sex work in England and Wales, published by the Home Office in 2019¹, is perhaps most comprehensive assessment of the state of the sector in the UK. It found:

"We recognise that there are many individuals in prostitution who are subject to acute exploitation and serious and sustained harm. Some identify selling sex as a pleasurable and lucrative career choice, or as a therapeutic vocation. Our sense from the data that we have collected and from reviewing existing research is that a substantial proportion of individuals (mainly women and trans women) are selling sex to get by financially, given different constraints in their lives around caring responsibilities, physical and mental health, lack of access to social security benefits and support services, workplace discrimination, or other reasons. Their situation is compounded by stigma and managing safety, and many find that the longer they sell sex, the harder it can be to leave completely."

We know from our engagement with our own members that financial pressures, as well as some of the other factors outlined in the extract above, are often the key drivers for people engaging in sex work. That is why we are clear that criminalising the purchase of sex would significantly increase the harms that they experience. Outlawing sex-buying does not remove the large pool of individuals who rely on the sale of sex to secure an income to live. These people would still face the same financial pressures and external factors, but in an environment in which it becomes harder and more dangerous to secure an income.

In terms of how and where sex workers provide services, looking across the 9,000 sex workers that NUM supports in the UK, our understanding is that the overwhelming majority advertise their services online – allowing them to screen clients in advance – and provide services in an off-street setting. The National Police Chiefs' Council set out in its 2019 sex work policing guidance that the "vast majority" of services advertised online relate to "independent sex workers and these should not be the focus of police activity"².

Screening clients

We were disappointed to see witnesses in a previous panel suggest that sex workers could not, and do not, take steps to vet clients prior to transacting with them. This is not accurate, and in fact our members routinely take steps – including via the use of our own NUM Checker tool³, and others – to vet and verify the those with whom they plan to transact.

Sex workers taking bookings will frequently take deposit payments from, or request to see identity documents of, the people with whom they plan to meet. This is one of the main reasons why criminalising the purchase of sex will increase the risks and harms faced by sex workers, as it naturally leads to buyers refusing to provide such details – as they fear it could be used to provide evidence of an offence being committed.

¹ <https://www.gov.uk/government/publications/nature-of-prostitution-and-sex-work-in-england-and-wales>

² <https://library.college.police.uk/docs/appref/Sex-Work-and-Prostitution-Guidance-Jan-2019.pdf>

³ <https://nationaluglymugs.org/num-tools-and-how-to-use-them/>

Our 2024 Trustees’ Report sets out the most recent full-year of figures for sex workers’ use of the NUM Checker⁴. It records that in 2023 NUM received 585 reports of violence against sex workers, and sent out just under 850,000 alerts to our members, bringing the total alerts sent by NUM since inception to over 3.33 million. Final figures for 2024 are still being compiled, but as I noted in the session, that figure now stands at over four million.

We should correct the misleading impression given by Ms Regan during the session that all of these alerts related solely to violence, as the system also provides warning around no-shows, timewasters and people who seek to underpay – all occurrences that make sex workers’ lives harder.

Polling

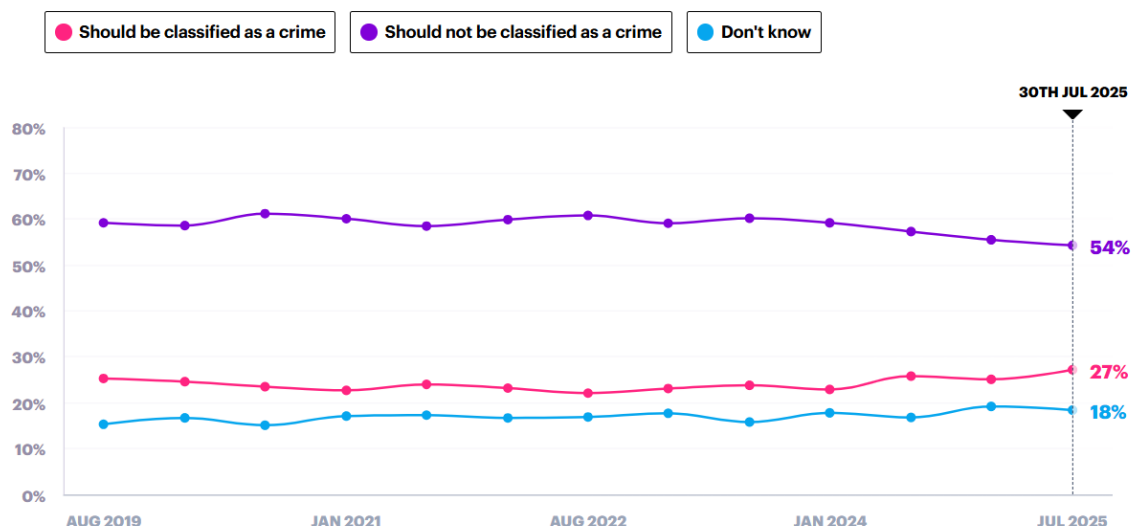
Jamie Hepburn raised the issue of opinion polling in relation to the Scottish public’s views of sex work. NUM commissioned leading pollsters YouGov to survey 1,088 Scottish adults between May 13th and 17th, 2024. As a gold-standard polling company, YouGov were scrupulous in ensuring that the questions were balanced and impartial, and did not lead respondents in any particular direction. The questions referenced in the session are set out below:

| | | |
|--|---------------------|-----------|
| Generally speaking do you think it should or should not be legal in Scotland for a person to do the following... | | |
| Pay someone to have sex with them? | | |
| | Should be legal | 47 |
| | Should not be legal | 32 |
| | Don't know | 22 |
| Which of the following comes closest to your view? | | |
| The Scottish Government should focus on protecting the health and safety of sex workers, and providing support to people who want to leave the industry. | | 69 |
| The Scottish Government should focus on preventing people from exchanging sexual services for money, including passing laws to outlaw it. | | 14 |
| | Don't know | 17 |

SNP voters were more likely than the average voter to say that it should be legal to pay someone for sex.

The results align with YouGov’s long term tracking poll of public attitudes towards sex work⁵, which has been carried out every six months for six years, and which has shown stable opposition – by a margin of around 2:1 – to the criminalisation of the purchase of sex:

⁴ <https://nationaluglymugs.org/wp-content/uploads/2024/12/N037-Charity-Commission-Accounts-2024.pdf>
⁵ <https://yougov.co.uk/topics/politics/trackers/do-brits-believe-that-paying-for-a-prostitute-should-be-seen-as-a-crime>



FULL QUESTION

Which of the following best describes your opinion on what, if any, aspects of prostitution should be seen as a crime? Buying a prostitute's services

We were disappointed to see polling published recently, commissioned by Ash Regan MSP from one of the new entrants to the online polling sector, which appears not to have taken scrupulous care to ask neutral and non-leading questions⁶. Questions such as *"Do you support stronger laws against buying sex as a way of tackling pimping, organised crime and sex trafficking in Scotland?"* [my emphasis] include seemingly deliberate cues to push respondents to assume that criminalising the purchase of sex would have the positive outcomes listed. We understand that complaints have been submitted to the pollster in question, and to the Market Research Society, the industry regulator, in respect of this survey.

Sex worker-appropriate support services

There was a lot of focus during the session on proposals to enshrine within the Bill the right for those selling sex to access support services. I wanted to emphasise the need to ensure that funding goes to support services that are non-judgmental and do not require sex workers to commit to exiting the industry.

Despite being the UK's national sex worker safety charity, providing direct support to 600 Scottish sex workers – thereby reaching more people selling sex in Scotland than any other organisation - NUM has historically been unable to access the Scottish Government's Equally Safe funding, because we will not sign up to their ideological statement that all sex work equals violence against women.

The gatekeeping of funding to services that subscribe to this ideological view leads to a proliferation of services with a religious background, and/or those who see sex workers as "fallen" women who need "saving". Sex workers find this patronising and largely refuse to engage with such services.

⁶ <https://findoutnow.co.uk/blog/polling-for-ash-regan-msp/>

A case in point can be seen in the Scottish Government's Trafficking and Exploitation Strategy Progress Report, published earlier this year, which details how Glasgow City Council's TARA and Routes Out services partnered with Police Scotland and other agencies to launch a new service to support Romanian sex workers - in line with the Equally Safe ideological approach. The progress report notes: "No women contacted or attended the drop-in so the pilot was not continued beyond 12 weeks. In addition, no Romanian women have presented to Routes Out since the pilot was discontinued."⁷

This is evidence supporting the point that I made in the session: services can only have real impact if they are designed for the benefit of the sex workers at whom they are targeted, as opposed to being created to suit the ideological agenda of those who see their role as being to "save" those engaged in sex work.

Impact of the Nordic Model in Ireland on numbers selling sex

Liam Kerr asked about the impact of the Nordic Model in Ireland on the number of people selling sex. As I set out above, gathering data on sex worker populations is extremely challenging, and we are not aware of any robust, publicly available evidence showing an increase or decrease in the total number of sex workers in Ireland following the 2017 law, although evidence does exist to show there has been no decline in sex working in Northern Ireland following the imposition of the Nordic Model there.

There is, however, clear evidence of increased harm in Ireland, with UglyMugs.ie, our sister organisation, reporting a 53 per cent increase in reported crimes and a 78 per cent increase in violent attacks against sex workers in the first year after the law came into force.

It bears repeating that the official evidence on the impact on the Nordic Model in both Ireland and Northern Ireland – the closest comparator countries to Scotland – shows that it has failed in its own terms.

The Irish Government's review, published earlier this year, found that after seven years of the legislation being in force, just 15 men had been convicted for purchasing sex. Irish Justice Minister Jim O'Callaghan said: "Regrettably, the review highlights that despite the criminalisation of the purchase of sexual services, demand has not decreased."⁸

The Northern Irish review, carried out by the Department of Justice, found that there was "no evidence that the offence of purchasing sexual services has produced a downward pressure on the demand for, **or supply of**, sexual services," [my emphasis].⁹

Impact of the Nordic Model in increasing stigma

During Pauline McNeill's questions we touched on how the Nordic Model increases stigma towards sex workers, thereby increasing the harms they experience.

⁷ <https://www.gov.scot/binaries/content/documents/govscot/publications/progress-report/2025/07/trafficking-exploitation-strategy-fifth-progress-report/documents/trafficking-exploitation-strategy-fifth-progress-report/trafficking-exploitation-strategy-fifth-progress-report/govscot%3Adocument/trafficking-exploitation-strategy-fifth-progress-report.pdf>

⁸ <https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/press-releases/review-of-legislation-that-criminalised-the-purchase-of-sex-completed/>

⁹ <https://www.justice-ni.gov.uk/sites/default/files/publications/justice/assessment-of-impact-criminalisation-of-purchasing-sexual-services.pdf>

Studies in France following the imposition of the Nordic Model found that 62.9% of sex workers said that their overall quality of life has deteriorated, with the criminalisation of clients “reinforcing their marginalisation, increasing violence and stigma, and exposing them to greater risks for their health”.¹⁰

The Northern Irish government study into the Nordic Model, cited above, found that “the legislation has contributed to a climate whereby sex workers feel further marginalised and stigmatised”.

The evidence shows that the stigmatising impact of labelling all sex workers as “victims”, and/or parties to a criminal act, pushes sex workers further to the fringes of society, increasing discrimination towards them and making it harder for them to engage with support services.

Relationship with Vivastreet

During the session, Ms Regan sought to imply that – because we allow Vivastreet, an adult services website, to purchase safety services from us for its users – we somehow have a conflict of interest. We should be clear that our relationship with Vivastreet is focused solely on sex worker safety and wellbeing.

Vivastreet provides funding to cover the cost of delivering NUM’s services to its users, particularly our vocational support programme, which provides sex workers with advice and practical assistance to help them diversify their income or leave the industry, if they choose to do so.

NUM will only ever work with organisations that we believe prioritise the safety and wellbeing of sex workers. We will only ever advocate on behalf of sex workers, and in what our members tell us is in their best interests.

Thank you again for the opportunity to provide evidence on this matter of vital importance to sex workers in Scotland.

Yours truly,



Lynsey Walton

Chief Executive

¹⁰ https://www.medecinsdumonde.org/app/uploads/2022/04/Web_EN_rapport-prostitution-finale-1.pdf