

# The role of adult service websites in addressing modern slavery

## Research Summary

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Research by:

## Key findings

The core challenge to be addressed in this research is the fact that Adult Services Websites (ASWs) are an extensive and pervasive feature of the digital world across the globe that facilitate the advertising, negotiation and purchase of sexual services yet are also considered to be harbourers of sexual exploitation, modern slavery, and human trafficking.<sup>1</sup>

This research gives insight and direction into how different organisations can work in partnership with ASWs to prevent modern slavery, human trafficking, and sexual exploitation in the UK.

### Key findings include:

1. Adult Services Websites (ASWs) are host to large amounts of intelligence about modern slavery and human trafficking. Therefore, regulation must increase responsibility of all ASW platforms, who must play a crucial role in the identification and prevention of modern slavery and human trafficking in the online sex industry.
2. Stakeholders including police, NGOs and five ASWs interviewed argued that ASWs ought to be regulated through ID verification and reporting tools, mandatory and proactive data sharing, safeguarding policies and proactive content moderation, which is nuanced and informed whilst protecting the activities of consensual sex workers online.
3. Stakeholders identified how the regulation should be shaped, highlighting the importance of adequate resourcing for implementation. Stakeholders recognised that there are potential disadvantages to increased regulation which must be overcome. This includes displacement of victims to encrypted spaces, stigma towards consensual sex work, and enforcement issues which could increase vulnerability to exploitation.
4. Recent socio-political attitudes have conflated modern slavery with illegal migration. Stakeholders argue that there needs to be greater knowledge of modern slavery victimisation, understanding its distinction from illegal immigration.
5. Some sex buyers believe they have responsibility to spot signs of exploitation and report these to the authorities, however, are distrusting of police and ASWs to respond appropriately. Sex buyers believe the legislation may have negative consequences on both consensual sex workers and increasing vulnerability to exploitation. Ultimately, most sex buyers want a safeguarding approach, that disrupts trafficking, without increasing surveillance of the consensual sex industry.

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1. Scoular, J., Pitcher, J., Sanders, T., Campbell, R., & Cunningham, S., 2019. Beyond the Gaze and well beyond Wolfenden: the practices and Rationalities of Regulating and Policing Sex work in the digital Age. *Journal of law and society*, 46(2), pp.211-239.

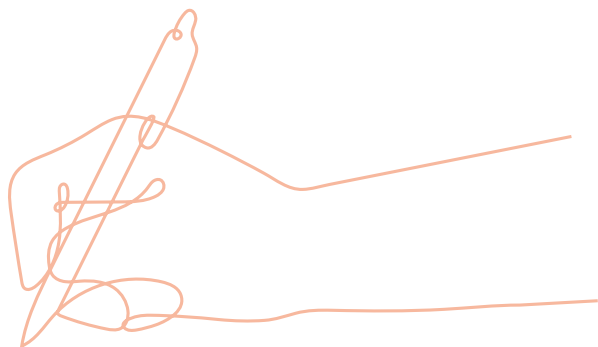
This is a summary of the report: **'The role of adult service websites in addressing modern slavery'** based on research conducted by **University of Leicester**, in partnership with the **National Crime Agency**, **National Police Chief's Council**, and the **NGO Unseen**. The project was funded through an open call for proposals by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC), which in turn is funded and supported by the UK Arts and Humanities Research Council (Grant: AH/X000702/1). The full report can be accessed on the Modern Slavery PEC website at [modernslaverypec.org/resources/adult-services-websites](https://modernslaverypec.org/resources/adult-services-websites) and the briefings and activities are freely available here.

The Modern Slavery PEC has actively supported the production of this Research Summary. However, the views expressed in this summary and the full report are those of the authors and not necessarily of the Modern Slavery PEC or AHRC.

## Background

The landscape where **modern slavery** and **sexual exploitation** takes place has changed with the onset of digital technologies dominating the organisation of the commercial sex industry. **Adult Service Websites (ASWs)**, where most sexual services are advertised, negotiated, and facilitated in the UK, are a relatively new space where exploiters can manipulate, entrap, coerce, and force individuals into selling sexual services.

The role of ASWs in facilitating offending behaviour is complicated and relatively **unregulated** as national intelligence services try to understand routes to trafficking, the police work to identify victims and target offenders, and first responders deliver interventions to support victims of sexual exploitation. This research investigated what role ASWs can play in **preventing human trafficking** and sexual exploitation in the UK, and their role in wider policies and laws.

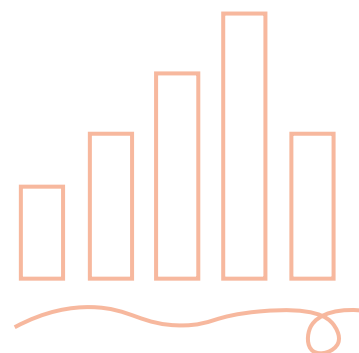


## Methodology

This study explored the ways Adult Service Websites (ASWs) have facilitated and responded to modern slavery human trafficking modern slavery and human trafficking and sexual exploitation online. To find ways that increased regulation can be used to disrupt traffickers and safeguard potential victims we utilised a multi-methods study comprised of:

- Semi-structured qualitative interviews to understand working relationships and greater responsibility of ASWs, including the role of increased regulation to prevent modern slavery and human trafficking on ASWs with:
  - police (n=30) across 23 forces in England & Wales,
  - practitioners (n=13) and
  - ASW operators (n=5)
- A semi-structured survey with sex buyers (n=142) to understand their role and responsibilities as whistle blowers against modern slavery and human trafficking.
- The study also analysed contemporary historical records and data from Unseen's Modern Slavery Helpline Records between 2017 and 2021, to identify knowledge on the role of ASWs in reported cases of modern slavery.

Central to the research process was a participatory action research approach with survivors of modern slavery, in partnership with Unseen. A growing body of research and associated policies advocates for meaningful involvement of stakeholder communities, particularly those historically marginalised, in the design, development and administration of the research that affects them.<sup>2</sup> This project recognised the survivors' experience and expertise as co-researchers. Consequently, ten peer researchers from eight different countries were hired, eight female and two male, ranging in age from mid-20s to 65+. They were actively involved through participation in the advisory group, instrument design, implementation, analysis, and the dissemination phase of the research project.



2. Ferris, S., Lebovitch, A. and Allard, D., 2021. Sex work research, ethics review processes, and institutional challenges for "sensitive" collaborative research. *International Journal of Qualitative Methods*, 20, p.16094069211033437.  
Lushey, C., 2017. *Peer research methodology: Challenges and solutions*. SAGE Publications Ltd.  
UKRI, 2020. Citizen Science Exploration Grant—UK Research and Innovation [ARCHIVED CONTENT]. The National Archives; 2020.

## Key Findings

**1. Adult Services Websites (ASWs) are host to large amounts of intelligence about modern slavery and human trafficking. Therefore, regulation must increase responsibility of all ASW platforms, who must play a crucial role in the identification and prevention of modern slavery and human trafficking in the online sex industry.**

Both law enforcement and practitioners view ASWs as having a responsibility to be a part of the solution in working to prevent modern slavery and human trafficking, given they are the host through which a large proportion of sexual exploitation is facilitated. However, there is an inconsistency between the ways different platforms choose to engage, with many viewing ASWs as lawless and indifferent to illegal activity occurring on their platforms, failing to safeguard and prioritising income over removing exploitative content.

Law enforcement, ASW operators and practitioners shared information on the current working practices of a small number of ASWs to identify exploitative activity on their platforms. Working relationships between law enforcement and ASWs during criminal investigations were expressed as best practice to aid both safeguarding processes for victims/survivors and to disrupt offender networks.

Police interviewees continually emphasised the importance of utilising ASWs as intelligence pools, and the need to gather sufficient data that is informed by research into modern slavery indicators, which plays a crucial role in the success of police investigations. Law enforcement gave examples of historic investigations whereby an inquiry to an ASW linked over 20 different adverts to one handler, who had paid for £33,000 worth of adverts in a three-month period.

However, police noted the tensions with platforms as profit making businesses and it was not always in their interest to report suspicious activity, especially given the current regulatory framework presents no mandatory requirements:

*'I don't know whether there's a reluctance of the websites to necessarily accept their role within it. They're a business, they're set up to make money, and they want to present as operating clearly within the law. But how willing they are to look for that exploitation, because that potentially loses revenue for them'*

**Police Constable, East England**

The enormity of the task given the scale of both online spaces (including encrypted messaging platforms) was often considered a core reason why tackling the problem is so difficult for police despite all the efforts, specialist support and legal reforms:

*'It feels a little bit trapped between the devil and the deep blue sea, if you eradicate them, I just think the internet is too difficult to police and it would pop up somewhere else and your task of tracking the criminals that are involved in it would become even more difficult than it is now.'*

Detective Inspector, Northeast

**2. Stakeholders including police, NGOs and five ASWs interviewed argued that ASWs ought to be regulated through ID verification and reporting tools, mandatory and proactive data sharing, safeguarding policies and proactive content moderation, which is viewed as nuanced and informed whilst protecting the activities of consensual sex workers online.**

The interviews with law enforcement and practitioners yielded some recommendations for how ASWs can be used to disrupt offenders. These regulatory recommendations could help shape the Codes of Conduct that will underpin the Online Safety Act, Codes of Practice, and their associated engagement with platforms.

- Clear reporting measures including designated support pages, partnerships with modern slavery NGOs and pop-ups informing users of their reporting responsibilities.
- Mandatory and proactive sharing of data between ASWs and the police regarding suspected exploitation cases, including the sharing of: financial data; IP addresses; phone numbers; messages and advert details;
- Robust & accessible safeguarding mechanisms, including: partnership work with NGOs to support survivors of exploitation; embedded referrals to ASW support pages; an on-hand support team; information on modern slavery and human trafficking and what to do if you suspect someone is being exploited; and a general Trust and Safety Centre to protect all users of their platforms.
- Deterrence tools which discourage traffickers from operating on ASWs, for example, increased prosecutions and sentences for convicted traffickers, and pop-up deterrence messaging for platform users.

**3. Stakeholders identified how the regulation should be shaped, highlighting the importance of adequate resourcing for implementation. Stakeholders recognised that there are potential disadvantages to increased regulation, which must be overcome. This includes displacement of victims to encrypted spaces, stigma towards consensual sex work, and enforcement issues, which could increase vulnerability to exploitation.**

To encourage compliance with new regulatory mechanisms, ASWs must be engaged within the process. Thus, ASW operators argued that they, as platforms, need to be included in the regulatory conversation, to ensure any legislation is fair, measured and will appropriately target exploitation. This would include enforcing levels of standard to cooperation, which ASW platforms must be willing to meet. Thus, enforced compliance should be an important feature of the Online Safety Bill:

*'I think that this is the way, but we must be aware that it must be done in such a way that no one is left out. Right now, the identification of the advertiser is not mandatory, having platforms that do it and others that do not, I think that the legislation has to be in charge of creating laws that force everyone to certain verification measures.'*

**ASW Operator, Adult Classified and Ads Website**

Yet, there were concerns from those involved in protecting victims/survivors of modern slavery and human trafficking that if the law was not correctly enforced, then there would be little progress going forward to make online companies responsible and weed out those who were not interested in preventing crimes:

*'Legislation is quite often a blunt instrument, but it's about how it's applied in practice and what practically you can do to ensure that adherence to legislation is followed through, and the consequences for not adhering I think are key. I think a good, strong legislative framework is helpful but it's not the panacea. It's the practical application and the guidance that sits around that.'*

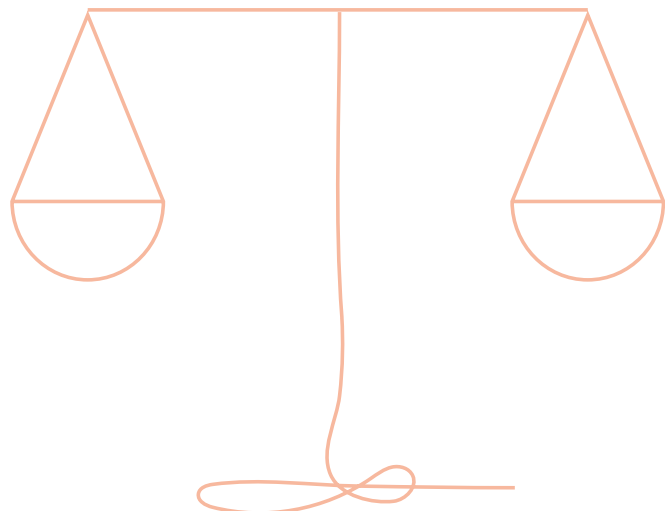
**Director, Head of Policy and Modern Slavery Coordinator, National Charity**

**4. Recent socio-political attitudes have conflated modern slavery with illegal migration. Stakeholders argue that there needs to be greater knowledge of modern slavery victimisation, understanding its distinction from illegal immigration.**

Law enforcement and practitioners interviewed were sceptical regarding this development, as despite the Government arguing the Illegal Migration Act (IMA) is necessary due to abuse of the modern slavery systems, law enforcement have not identified evidence of such abuse. Instead, they uncovered a myriad of barriers to engagement with the system that may exacerbate the current levels of underreporting, including but not limited to:

- A mistrust of authorities,
- Fear of abuse to themselves/their families by trafficker,
- A wish to escape exploitation and not prolong their trauma.

The UK Government must recognise that the IMA's modern slavery provisions are likely to decrease victims' willingness to support criminal investigations and may also increase the risk of exploitation. UK modern slavery and human trafficking policy must be integrated with trauma informed support and provisions that support rather than stigmatise or blame victims of trafficking.





**5. Some sex buyers believe they have responsibility to spot signs of exploitation and report these to the authorities, however, are distrusting of police and ASWs to respond appropriately. Sex buyers believe the legislation may have negative consequences on both consensual sex workers and increasing vulnerability to exploitation. Ultimately, most sex buyers want a safeguarding approach, that disrupts trafficking, without increasing surveillance of the consensual sex industry.**

From a survey hosted on consumer forums and ASWs, 142 responses were received which shed light on the perspectives of those seeking to buy sex when signs of exploitation are encountered both online and in person. 92% of those surveyed were male, 69% were aged 45 and over, with just under 50% having purchased sexual services on ASWs for 3 years or more. This group of actors in the sex industry are rarely consulted, very difficult to access and often lie under the radar of any policy consultations or discussions.

There is evidence that when browsing sex worker profiles verification checks are carried out by sex buyers to ensure the sex worker is not displaying obvious signs of sexual exploitation. More effective methods of reporting concerns both to ASWs and the police are needed – there also needs to be more education for sex buyers on where to send concerning information. Sex buyers in the survey were broadly in agreement for greater regulation of ASWs. Sex buyers are arguably the initial group who would see signs of exploitation, and therefore could play an even greater role than they currently do.

When asked if they believe ASWs should be more regulated, 51% of respondents agreed: Respondents gave reasons for their answers, including a duty of care, the importance of a legalised sex market, the argument to stop trafficking at the source and fears of displacement of the market. There was appetite to see the ASW as the key trusted partner here and were the most likely organisation for the buyer to contact about suspicious concerns. However, there were concerns that regulation of ASWs could demand more personal information from sex buyers, compromising anonymity, thus disincentivising platform use by sex buyers and sex workers, resulting in displacement consequences. Overall, respondents believed the Online Safety Bill and regulation of ASWs would make platforms less attractive, increase vulnerability and displace the sex industry. But there was an acknowledgement that there were ways in which platforms could be regulated and checked by authorities that did not compromise the behaviour of adults to engage in consensual sexual services.

# Recommendations

For more detail on the recommendations, please see our [full research report](#).

## For the UK Government

### **1. Formulate the Online Safety Act with prevention of modern slavery and human trafficking at its core, built in consultation with all stakeholders, including ASWs.**

This research identified some key regulatory practices that ought to be adopted. Legislation must be supported by consultation with stakeholders, including ASWs who have the capabilities to distinguish between legitimate sex worker adverts and potential victims of exploitation.

### **2. Respect the continued practices of the wider sex industry.**

Criminalising sex work in any form (independent workers, or those working together for safety in brothels) puts sex workers at increased risk of abuse, violence, and exploitation. Our research found concerns that, as happened in the USA with SESTA/FOSTA, sex work is in danger of being driven into more dangerous environments. Thus, legislation must be supported by an effort to protect the consensual sex industry.

### **3. Recognise that modern slavery does not equal illegal migration.**

The Illegal Migration Act (IMA) seeks to criminalise illegal migration for modern slavery victims, even when this was forced or coerced, resulting in those who are perceived to be uncooperative with law enforcement investigations going unsupported if they are deemed to meet the Act's criteria (e.g. have arrived in the UK irregularly).<sup>3</sup> Law enforcement have not identified evidence of such abuse. Instead, they uncovered a myriad of barriers to engagement with the system.

The UK Government must recognise that the IMA's modern slavery provisions are likely to decrease victims' willingness to support criminal investigations and may also increase the risk of exploitation. UK modern slavery and human trafficking policy must be integrated with trauma informed support and provisions that support rather than stigmatise or blame victims of trafficking.

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3. <https://modernslaverypec.org/resources/migration-act-explainer>

## For Ofcom

### Establish Codes of Practice and a working group in consultation with ASWs and sex workers.

**Legislation is a useful too, but it is not the panacea.** This research project gathered views on the usefulness of tighter regulation, and suggestions for how Ofcom could enforce their Codes of Practice. All stakeholders agreed that legislation, whilst useful, is not the panacea and must be supported by multi-agency working groups, consultation with sex workers and educational efforts to identify modern slavery, protect sex workers and prevent the criminalisation of migrants.

*'Legislation is quite often a blunt instrument, but it's about how it's applied in practice and what practically you can do to ensure that adherence to legislation is followed through, and the consequences for not adhering I think are key. I think a good, strong legislative framework is helpful but it's not the panacea. It's the practical application and the guidance that sits around that.'*

**Director, Head of Policy and Modern Slavery Coordinator, National Charity**

#### 1. Towards a better understanding of modern slavery and human trafficking.

Ofcom need to better understand what modern slavery is, the ways in which victims are recruited and trafficked into the UK, and the ways ASWs are used to facilitate consensual sex work as distinct from exploitation and trafficking.

#### 2. Monitor ASWs.

Ofcom need the tools to monitor ASWs or work closely with partners to identify violations. This includes ways to prevent encrypted spaces being an alternative to facilitate exploitation.

#### 3. Code of Practice.

Ofcom's Code of Practice must include minimum standards and guidelines for ASWs to improve their modern slavery detection and eradication, including ID and consent verification.

#### 4. Consultation.

Ofcom need to build their Codes of Practice in consultation with expertise in the field. This includes setting up a working group with ASWs, law enforcement, NGOs and practitioners, sex workers, and survivors of exploitation whose knowledge can shape the regulatory framework.

## For ASWs

Increased responsibility and regulation of online platforms that disrupts modern slavery and human trafficking and protects consensual sexual activity.

### 1. Collaboration with ASWs is key.

ASWs must be included in the conversation, collaborating with NGOs, law enforcement and sex worker communities to stay abreast of ongoing modern slavery and human trafficking and internet safety trends, to share tips for identifying modern slavery and human trafficking and be proactive in referrals of suspicious content.

### 2. Support broader efforts to increase responsibility of ASWs.

Explore ways to increase responsibility of ASWs to proactively prevent modern slavery and human trafficking on their platforms whilst reassuring them of their rights to continue to facilitate the purchase and sale of consensual sexual activities. This could include stakeholder working groups and financial repercussions for failure to cooperate. Also included in this is an incentive scheme to abide by Ofcom's Codes of Practice and increase proactivity and working relationships with law enforcement. ASWs should also explore ways of making it easier for sex buyers to report concerns, given their appetite for responsibility in this area.

### 3. Areas identified for ASW implementation include:

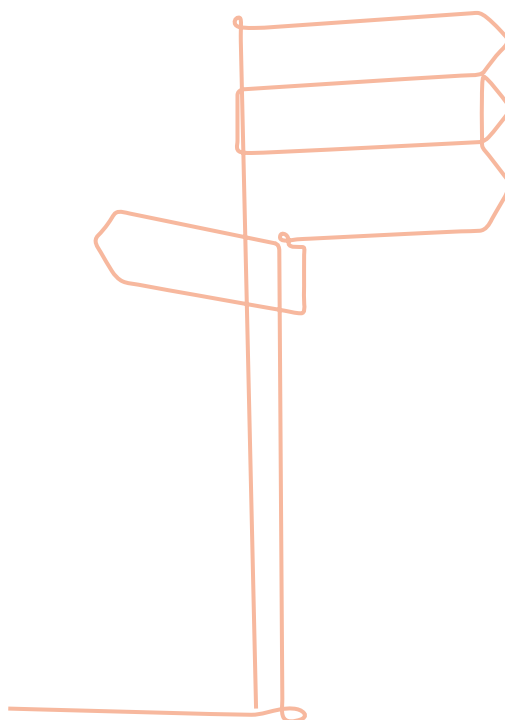
- a. **modern slavery and human trafficking policies, codes of practice** (outlining what content and behaviour is allowed and banned on platforms), DMCA take-down policy, and crime reporting protocols.
- b. **Proactive sharing of financial, advert and personal data** with law enforcement to assist criminal investigations.
- c. **Trust & Safety Centre** which provides support, advice, and resources sex buyers and sellers.
- d. **Transparency reports** whereby the platforms publish monthly and/or annual reports both of their work with law enforcement to ensure action against illegal acts and to prevent fraud, money laundering and modern slavery and human trafficking and to share any requests for assistance.
- e. **Pop-up & accessible reporting mechanisms for users of ASWs** including partnerships with Unseen who run the UK's Modern Slavery Helpline.
- f. **Human and AI moderation of content** including hash scanning, google content safety API, algorithms and fingerprinting of all content and the proactive removal of **suspicious content**.

- g. Multi-layered safety/verification processes.** These include ID, age, and consent verification measures, including 'know-your-customer' processes, and mandate use of identifiable payment methods.
- h. Education for ASW platforms on modern slavery and human trafficking.** Sharing intelligence on emerging and changing trends and adaptation of internal safety measures.

## Areas for further research

Further research is required to explore further the online dimensions of sexual exploitation, and an evaluation of the use of a variety of social and policy responses to exploitation.

As policy and regulation in the form of the Online Safety and Illegal Migration Acts progresses, we need to evaluate their efficacy in seeking to criminalise exploitation whilst safeguarding consensual sex workers online. There is a need for a stable and universally agreed upon approach to sex work in general whilst any modern slavery interventions adhere to international policies that seek to protect victims of exploitation and criminalise offenders. Given the current timeframe the efficacy of increased regulation in this area is unknown.



# MODERN SLAVERY & HUMAN RIGHTS

POLICY & EVIDENCE CENTRE

Led by the Bingham Centre

The Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) was created by the investment of public funding to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to address it. The Centre funds and co-creates high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society, survivors and the public on a scale not seen before in the UK to collaborate on solving this global challenge.

The Centre is a consortium of six academic organisations led by the Bingham Centre for the Rule of Law and is funded by the Art and Humanities Research Council on behalf of UK Research and Innovation (UKRI).

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