

Equally Safe: A consultation on challenging men's demand for prostitution, working to reduce the harms associated with prostitution and helping women to exit

Submission by The Free Church of Scotland

Question 1: Do you agree or disagree that the Scottish Government's approach to tackling prostitution, as outlined in this section, is sufficient to prevent violence against women and girls?

The Free Church of Scotland wishes to commend the Scottish Government for its 'Equally Safe' strategy which is an excellent starting point for tackling prostitution. We fully support the Scottish Government in recognising that prostitution is a form of violence against women and we welcome the opportunity to contribute to the discussion on how to protect the vulnerable in our society from violence.

As Christians we believe all human beings have inherent worth and value, having been made in the image of God. We also believe it is right for the church to speak up on issues such as prostitution and to strive for a more just society. Proverbs 31:8-9 tells us to "Speak up for those who cannot speak for themselves, for the rights of all who are destitute. Speak up and judge fairly; defend the rights of the poor and needy."

We are pleased to see the Scottish Government's focus on eradicating violence against women and girls ('VAWG'), and its focus on prevention and holding perpetrators to account. However, while we support the Equally Safe strategy, we do not believe Scotland's Current Approach to Prostitution is sufficient to prevent VAWG.

Scotland's current legislative approach to tackling prostitution is insufficient. It appears to have developed in a piecemeal fashion which prohibits certain activities traditionally associated with prostitution without addressing the more fundamental issues of principle. The current approach is also outdated and unfit for the modern world where prostitution has moved off the street and online. There are insufficient legislative mechanisms designed to reduce the demand for prostitution and hold third-party exploiters to account. Currently, paying for sex is not prohibited, nor does the law comprehensively prohibit third parties enabling or profiting from someone else's prostitution. We also note that the victims of sexual exploitation are currently criminalised through penalties for soliciting to sell sex.

We therefore support the Nordic Model approach, which decriminalises those who are prostituted, while offering them high-quality support and exiting services, including genuine routes out, and makes buying people for sex a criminal offence, in order to reduce the demand that drives sex trafficking and prostitution¹. We would emphasise that for the Nordic model to be effective in combating VAWG it is vital that all three strands of the model are adopted:

¹ <http://nordicmodelnow.org/what-is-the-nordic-model/>

(1) Full decriminalisation of those who are prostituted

The evidence suggests that the majority of women and children enter prostitution as a result of childhood abuse, poverty and misfortune, grooming, coercion, and/or betrayal, rather than as a free choice². As the Scottish Government already recognises, prostitution is inherently violent and damages those in it. It is also clear that it is very hard for women to get out of prostitution and a criminal record makes getting out even harder.

Accordingly, we believe the victims of abuse and coercion should be decriminalised – all laws which target those who are prostituted should be repealed and previous criminal convictions should be cleared for specific offenses related to their own prostitution.

To be effective this must be championed at the highest level and be combined with measures to address all the factors that drive people into prostitution.

(2) Buying sex to be made a criminal offence

The purchase and attempted purchase of human beings for sex should be made a criminal offence. This straightforward prohibition on the buying of sex makes a clear public statement that people are valuable and cannot be bought. It also deals with all forms of procuring sex unlike existing legislation and so is suitable for the modern world, where we know sex is no longer predominantly procured on the street or in brothels.

Alongside this we would strengthen the existing legislation that criminalises third parties who profit from the prostitution of others.

(3) High-quality services for those in prostitution

It is vital that, alongside the decriminalising those who are prostituted and making the buying of sex a criminal offence, high-quality services are provided to those in prostitution – particularly aimed at helping women to escape prostitution. If such services are not provided alongside 1 & 2 then it is likely more harm would be done to women trapped in prostitution.

It must be recognised that each woman is an individual and help must be tailored to their situation – this will require a variety of different support services.

Funding for these services must be ring-fenced and must be continuous. We would suggest it might be possible to ring-fence money raised from fines applied to those convicted of buying sex could be channelled to these support services in a similar way to the Cash Back for Communities scheme³. In this way there is a reparative element to the fine. It is also vital that the money is provided to those best placed to deliver the service which will often

² <https://nordicmodelnow.org/facts-about-prostitution/fact-choice-is-complicated/>

³ <https://cashbackforcommunities.org/>

mean third sector organisations rather than government bodies due to the stigma associated with the state.

The services must be non-judgemental and cover harm reduction as well as exiting support, including housing, legal advice, addiction services, long-term emotional and psychological support, education and training, and childcare. Because those buying sex are almost entirely men, services for women should be female-only and services for men and transgender people should be separate.

We also support the Encompass Network's seven element proposal for preventing and eradicating prostitution in Scotland⁴.

Question 2: What are your observations as to the impact of the coronavirus outbreak on women involved in prostitution in Scotland?

We have no direct knowledge of the impact of the coronavirus outbreak on women involved in prostitution in Scotland, however, we would make some general comments.

Support that has been available for others during the pandemic – such as the furlough scheme and the self-employed scheme – will not have been available for women involved in prostitution. This will obviously have placed them in an impossible situation of having to either cope with the impact of poverty or put themselves at risk by continuing to engage in prostitution.

We also understand that many women may have turned to online non-contact of commercial sexual exploitation – such as webcamming and selling intimate images. This means that these online markets are now saturated with women trying to make enough money to survive – which has reduced their bargaining power even further – and so men are making ever more extreme demands on them and they have little choice but to comply, such is their desperate need for money.

It also must be noted that Webcamming and selling intimate images to strange men are not easy, benign options, but are fraught with dangers for women, including the risk of profound psychological and emotional harms, and men stealing their images/videos and sharing them elsewhere ('revenge porn') and harassing and stalking them – all of which can make it harder, if not impossible, for women to subsequently gain alternative employment⁵ and can have a massive impact on their mental health. Moreover, third parties operating online platforms continue to profit off these women.

Question 3: Which of the policy approaches (or aspects of these) outlined in Table 3.1 do you believe is most effective in preventing violence against women and girls?

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http://www.encompassnetwork.info/uploads/3/4/0/5/3405303/preventing_and_eradicating_prostitution.pdf

⁵ <http://nordicmodelnow.org/2020/10/24/3-dangerous-myths-about-webcamming-debunked/>

The Consultation paper uses an outdated categorisation of prostitution policy approaches devised in 2005. Since 2005 a number of European countries (Norway, Iceland, France, Northern Ireland and the Republic of Ireland), have adopted a Nordic Model approach (which we support), however the key elements of this approach are not clearly set out in the table.

The table's definition of the Nordic Model focuses on the purchase of sexual services being criminalised whilst the provision of sexual services is decriminalised. This is misleading as it ignores the third vital aspect of the Nordic model – high quality support services to help women to exit prostitution. The Nordic Model is not simply a matter of making the purchase of sex a criminal offence and repealing legislation that targets those in prostitution. It must also include ring-fenced permanent funding for high quality services for all those involved in prostitution, including harm reduction services and individually tailored exiting services that are trauma informed and include housing, training, psycho-social support, child care, employment, benefit and legal advice, and help with escaping from pimps, etc. It also needs to clamp down on all forms of profiteering from another's prostitution, including pimping, and advertising and facilitation, whether online or offline.

The Scottish Government rightly recognises that prostitution is a form of gender-based violence against women and girls ('VAWG'). As such it can never be made safe. It can never conform to even the most basic health and safety standards. It is intrinsically violent and women involved in prostitution are at the highest risk of murder of any social group, almost entirely at the hands of punters and pimps.

The idea that you can make prostitution safe (as claimed by some sex trade advocates) or that you can reduce the harms associated with it to an acceptable level is nonsense.

If the Scottish Government is serious about preventing and eradication all violence against women and girls, it must develop a holistic approach which is part of the Nordic model. Alongside the decriminalisation of those who are prostituted (included a clearing of previous criminal convictions associated with prostitution) and the criminalisation of the buyers of sex and third parties who profit off of someone else's prostitution the government must develop extensive support services for women to exit prostitution. Failing to provide services as part of the Nordic model would result in more harm being done to women who cannot find a way to exit prostitution.

It must be recognised that each woman is an individual and help must be tailored to their situation – this will require a variety of different support services. Funding for these services must be ring-fenced and must be continuous. We would suggest it might be possible to ring-fence money raised from fines applied to those convicted of buying sex could be channelled to these support services in a similar way to the Cash Back for Communities scheme⁶. In this way there is a reparative element to the fine. It is also vital that the money is provided to those best placed to delivery the service which will often mean third sector organisations rather than government bodies due to the stigma associated with the state.

⁶ <https://cashbackforcommunities.org/>

The services must be non-judgemental and cover harm reduction as well as exiting support, including housing, legal advice, addiction services, long-term emotional and psychological support, education and training, and childcare. Because those buying sex are almost entirely men, services for women should be female-only and services for men and transgender people should be separate.

Alongside this should be a widespread public information campaign (like the one that accompanied the change in the smoking laws). This will help those in society understand that prostitution is always violence to women and degrading to women. Women and children should never be for sale.

There must also be age-appropriate education programmes in schools that explain honestly the damage that prostitution causes.

Experience in other countries has also shown that for the Nordic Model to be effective, it needs to be accompanied by in-depth training for the police, judiciary, procurator fiscals, and frontline workers in education, social services, local government, the NHS, etc.

The Nordic model has the advantage of reducing the demand for prostitution and providing real, practical alternatives to women trapped in prostitution. It also has a knock-on effect of reducing trafficking as it becomes less profitable to traffic women into an area with less demand for prostitution.

The three aspects of the Nordic Model each fulfil key policy objectives. Criminalising paying for sex is necessary for reducing demand for prostitution, holding perpetrators accountable, and disincentivising trafficking and other forms of third-party exploitation. Decriminalising selling sexual access to one's own body is necessary in order to remove barriers to individuals exiting prostitution and accessing support. Providing support and exiting services is necessary to support women currently involved in commercial sexual exploitation to overcome the multiple barriers that can be faced when exiting prostitution.

As Christians we also believe the Nordic Model is consistent with the teaching of the Bible. Although prostitution was socially disapproved of in the Old Testament Israel it is worth noting that biblical laws did not forbid it. The law forbade fathers selling their daughters into prostitution, presumably to pay off debts (Leviticus 19:29) which would support the position that third parties profiting off of someone else's prostitution should be punished.

And yet while prostitution was disapproved of the Bible treats women caught up in prostitution with respect and dignity while condemning those who engage in prostitution. Tamar, Judah's daughter-in-law, was not a prostitute but she pretended to be one in order to lure Judah to impregnate her (Genesis 38). The story reveals Judah's double standard—he sees himself as at liberty to use a prostitute but when he suspects his daughter-in-law of prostitution he orders her execution. The story, however, ultimately vindicates Tamar and exposes Judah's hypocrisy.

Rahab is also presented in a positive light (Joshua 2:1–14). She is a female, foreign prostitute but she trusts in Israel's God, and helps the people of Israel in their attack on Jericho. For

this loyalty she was spared and her descendants lived in Israel (Joshua 6:17–25). In the New Testament, Rahab is honoured as one of the ancestors of David and of Jesus (Matthew 1:5). She is upheld as a model of faith (Hebrews 11:31) and as one who was justified by her works of faith (James 2:25–26).

The stories in the Old Testament challenge stereotypes of prostitutes and challenge us to see prostitutes as real people—daughters, mothers, sisters – worthy of dignity and respect. This is then the attitude that Jesus brings to those he encounters. Jesus welcomes outcasts – tax collectors and prostitutes – stating that they are entering the Kingdom of God ahead of religious leaders (Matthew 21:28-32). Jesus was not here endorsing the validity of prostitution as a lifestyle—indeed the power of the saying depends upon the undesirability of prostitution (even they are ahead of you!). But he was implicitly rejecting the idea that prostitutes were inherently worth less and was welcoming repentant prostitutes into the kingdom of God. He sought to restore them.

Perhaps though the most helpful passage from the Bible is John 8:1-11 where Jesus responds to a woman caught in adultery. The people want to stone her for her crime, but Jesus intervenes – essentially decriminalising her and protecting her from the people’s condemnation. However, he is not content to leave her in the situation as he tells her to stop engaging in this kind of behaviour as she goes off.

As Christians we see many principles in the Bible which we believe support the Nordic Model of decriminalising women engaging in prostitution, who are the victims, whilst making a strong statement that the behaviour is wrong by criminalising the buyers and third parties who profit off of other’s prostitution. We also note the desire of Jesus to help women escape prostitution – welcoming them into the kingdom of God – extending mercy and forgiveness to them as they are called to make a new life.

Question 4: What measures would help to shift the attitudes of men relating to the purchase of sex? Do you have any examples of good practice either in a domestic or an international context?

Criminalising paying for sex is vital to shifting the attitudes of men relating to the purchase of sex and, crucially, changing their behaviour and reducing incidences of commercial sexual exploitation.

The ‘Challenging Men’s Demand for Prostitution in Scotland’ study asked male Scottish prostitution-buyers what would deter them from buying sex. The responses were unequivocal: the only things that would significantly impact their own lives would be likely to change their behaviour, such as being added to the sex offender registry, being outed as a sex buyer in public, or a criminal penalty. They were also clear that the current kerb crawling laws were not a deterrent because they know they are extremely unlikely to be caught under them because the police don’t implement them rigorously or at all⁷.

⁷ <http://www.rapecrisisScotland.org.uk/resources/Challenging-Men-s-Demand.pdf>

A study by the University of Leicester published in 2018 asked over 1200 sex buyers the following question: 'Would you change your behaviour if a law was introduced that made it a crime to pay for sex?' Over half of the respondents said they would "*definitely*", "*probably*" or "*possibly*" change their behaviour⁸. Another study of men who pay for sex in the UK found: "*More than three-quarters of interviewees acknowledged that greater criminal penalties would deter them from paying for sex*"⁹

Alongside the criminalisation of those who buy sex other measures to better educate men to the impact of prostitution on women and the means through which women entered prostitution such as whether they were coerced or trafficked. This requires a widespread and hard-hitting public information campaign perhaps similar to the very successful ones that preceded the introduction of the UK ban on smoking in public places in 2006.

The ban on buying sex must also be accompanied by the repeal of any laws that target those selling sex and the provision of high-quality, trauma-informed services for them, along with genuine alternatives and routes out. It would be unreasonable to ban the purchase of sex while women are still driven into prostitution and other forms of commercial sexual exploitation (including webcamming and sharing sexualised images) under the coercion of extreme poverty and lack of viable alternatives, or under the coercion of pimps and traffickers. These issues must therefore be directly and proactively tackled alongside the introduction of the sex purchase ban.

The consultation paper suggests, men's pornography and prostitution use are linked. Many men struggle to give up their pornography use and the same is likely to be true with prostitution. Therefore, the Scottish Government should also invest in high-quality free or affordable services to men to help them with this. This should be offered to men convicted of sex purchase offences but should also be available to all men on the basis of self-referral. More generally education should be offered to men convicted of buying sex to help them understand the impact of their actions on women – perhaps a lesser fine where men agree to undertake training.

The consultation paper suggests that if a man has not purchased sex by the age of 25, he is less likely to do so in the future. This, and the connection between pornography and prostitution use, means that age restrictions on online porn must be introduced as a matter of urgency to limit, if not prevent, under-18 years olds from viewing it. Similarly, boys and young men should be given assistance in understanding pornography, prostitution and all forms of commercial sexual exploitation as violence against women. They should be helped to develop strategies for resisting and challenging peer pressure to engage in pornography and prostitution. This could be done not only through schools and colleges but also youth centres and young offender programmes.

⁸ Sanders, T. et al (2018) 'Beyond the Gaze: Briefing on Customers who Buy Sex Online', University of Leicester.

⁹ Men Who Buy Sex: Who they are and what they know, Eaves, 2009, p.26.

Question 5: Taking into account the above, how can the education system help to raise awareness and promote positive attitudes and behaviours amongst young people in relation to consent and healthy relationships?

We are encouraged to see the Scottish Government's desire to make clear certain sexual behaviours such as prostitution and other commercial sexual exploitation are unacceptable. We believe this should be done in a clear and unambiguous way. We believe young people should be taught that prostitution is violence against women and exposed, in an age-appropriate way, to stories of those who were trafficking or coerced into prostitution.

Sex industry advocates have pushed the term 'sex work' into mainstream and education should challenge this. 'Sex work' is a powerful euphemism that normalises prostitution and obscures its real harms and young people should be told this. Many people, perhaps most, innocently think that the 'sex work' term is more respectful of the women involved and believe that any criticism of 'sex work' implies a criticism of the women involved – because the way the term is used invariably frames it as a woman's choice. Teachers are not immune to these influences and without explicit guidance and training there is a real risk that they will inadvertently reproduce these dominant cultural messages in the classroom rather than challenging them and framing prostitution and other forms of sexual exploitation within the context of systemic structural inequality and endemic male violence against women and children.

Discussion of consent should highlight the question of whether consent is possible in a sexual relationship when one party is paid by the other. Both boys and girls need to understand the very real dangers that prostitution (and other forms of sexual exploitation, including pornography and webcamming) cause to individuals and to be able to discuss these issues in a safe environment. They need help with resisting pressures to participate in such activities and need to know where to go for help if they find themselves at risk of being sucked in.

Young people must be taught that profiting from another person's prostitution is always wrong and understand that human trafficking is an abuse of human rights.

Fundamentally we believe the education system should take a holistic approach to relationships and help people to understand other people as individuals. Moral and spiritual beliefs should be taken into account – especially when dealing with consent where pressure can be put on one partner to abandon their moral or spiritual beliefs.

We need to teach young people that relationships are not about what you can get out of the other person but that you should value the other person and respect them. Prostitution or other forms of commercial sexual exploitation does not treat the other person with dignity and so is never appropriate.

Question 6: How can the different needs of women involved in prostitution (in terms of their health and wellbeing) be better recognised in the provision of mainstream support?

We believe a holistic and flexible approach is needed, recognising that every women's situation is different. A variety of mainstream services must be provided and a number of services not directly addressing prostitution should be trained to sign post women to further help.

We support the Encompass Network's proposals for preventing and eradicating prostitution in Scotland. This has seven elements, one of which is capacity-building so that staff in mainstream and specialist services have the right skills to meet the needs of those involved in prostitution: "A comprehensive national programme of training and capacity-building is needed for all relevant frontline services and agencies. This would promote understanding of the system of prostitution and its relationship to gender and other inequalities; the impact and trauma of prostitution on the individuals involved; their support, health and other needs; and good practice in supporting those affected."¹⁰

We note that over recent years there has been an erosion of women-only services in areas like homeless hostels, addiction and mental health. This can be particularly harmful to women who are or have been involved in prostitution. Their needs are often acute and can be very different from those of men. Furthermore, their trauma has been caused by the actions of men.

Living in a hostel with homeless men is inappropriate for all vulnerable women but even more so for women with lived experience of prostitution. Participating in group work with men is often counter-productive for women who are or have been involved in prostitution. Therefore, it is imperative that mainstream services, particularly homelessness, addiction and mental health services, provide women-only facilities – particularly for group work and all residential facilities. This understanding needs to be built into the commissioning of services.

Mainstream services should also be alert to the role they can provide in preventing women entering prostitution in the first place. As extreme poverty, homelessness, addictions and the coercive control of male partners are often key drivers in women becoming involved in prostitution, the provision of adequate social security, job and training opportunities, affordable housing, addiction services and practical support to escape abusive partners must be seen as high priority and funded accordingly.

We also believe that decriminalising of those who are prostituted has the potential to open up more conversations with mainstream support agencies regarding prostitution. At the moment there might be a reluctance to open up about it for fear of prosecution. We need to empower women to speak openly and seek the help they need.

Question 7: In your opinion, drawing on any international or domestic examples, what programmes or initiatives best supports women to safely exit prostitution

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http://www.encompassnetwork.info/uploads/3/4/0/5/3405303/preventing_and_eradicating_prostitution.pdf

For most women who are involved in prostitution, the most immediate barriers to exiting are (a) the lack of an adequate alternative income; (b) drug addiction; (c) being under the control of a pimp or trafficker, who is often their 'boyfriend' or intimate partner; and/or (d) homelessness. Other longer-term issues can include physical and mental ill-health, including PTSD and crippling anxiety, and the lack of a social network outside of the prostitution milieu.

Research carried out in the UK by the Roger Matthews and others found that the majority of women can leave prostitution relatively quickly given support and motivation that is positive, proactive, and includes practical help with addressing the immediate barriers mentioned above¹¹.

Women-only residential drug rehabilitation should be available for those with intractable drug addictions, and women-only refuges for women who need to escape abusive and controlling partners and pimps.

However, it is well known that many women – especially those who have been in prostitution for some time – have difficulty sustaining a life outside prostitution over time¹². Long-term support, including practical assistance and psychosocial support for as long as necessary is essential.

Services must be women-only, welcoming, non-judgemental, trauma-informed, and free. Funding must be ring-fenced and permanent so that expertise and trust can be developed, collaboration with other services established, and there can be long-term planning.

The provision of exiting services must be combined with the repeal of laws against soliciting and loitering to sell sex and the expunging of any criminal records for the same as having criminal records can affect women's employment prospects. Prostitution-related criminal records trap women in prostitution. The Scottish Government rightly understands prostitution is a form of gender-based violence. It therefore makes no sense to criminalise women for their involvement nor to penalise them for their historic convictions for the same.

Support should be given to organisations which help women to work outside prostitution. Israel has a very successful initiative called 'Turning the tables' that provides training and employment in fashion for women who are exiting the sex trade. There are examples of similar initiatives in the UK that are not specifically aimed at women exiting prostitution but they provide a model that could be developed for women exiting prostitution. For example: The Wren Bakery in Leeds provides training and employment opportunities to disadvantaged women¹³; and the Timpson Foundation is an ethical business that proactively employs ex-offenders¹⁴. We are also impressed by the work of Grace Chocolates in

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http://www.researchgate.net/publication/303791910_Addressing_Prostitution_The_Nordic_Model_and_Beyond

¹² <http://nordicmodelnow.org/facts-about-prostitution/fact-women-often-struggle-to-leave-prostitution/>

¹³ <http://www.thewrenbakery.com/>

¹⁴ <http://www.timpson-group.co.uk/timpson-foundation/ex-offenders/>

Edinburgh who seek to help any woman who has touched the Scottish criminal justice system and is keen to make positive steps towards finding a job¹⁵.

Probably the best UK example of a successful local initiative to support women to exit prostitution is Ipswich. It was a three-pronged strategy, very similar to the Nordic Model. Firstly, they stopped arresting the women and instead provided them with substantial help to exit prostitution and rebuild their lives. Secondly, they used the kerb crawling legislation and number plate recognition technology to crack down on the punters. And thirdly, they worked with children at risk of being groomed into the sex trade to prevent them also ending up exploited on the streets¹⁶.

A review of the approach was undertaken by the University of East Anglia in 2012. It found that: the strategy had been successful in eliminating street prostitution and kerb crawling from the town and there was no evidence it had been displaced elsewhere; the women had been helped to rebuild their lives outside prostitution; successful inroads had been made in preventing young people getting involved in prostitution; and costs to the criminal justice system were significantly reduced. The report ended with the following paragraph:

“The evaluation highlighted the central importance of a joint commitment of criminal justice, social, health and voluntary agencies and their sustained relationships with the local community in developing a shared change in attitude towards prostitution and those involved in it. Finally, it concluded that there is much to commend this collaborative strategy both to other regions of the UK and to other countries, as an innovative, effective and cost-effective means of achieving justice for all stakeholders.”¹⁷

Question 8: Support services are primarily focussed within four of Scotland’s main cities – Aberdeen, Dundee, Edinburgh and Glasgow – how can the needs of women throughout Scotland who are engaged in prostitution be met, noting that prostitution is not solely an urban issue?

Prostitution is inherently unsafe, and nothing can change that. Therefore, the primary aim of prostitution policy must be: to reduce the amount that happens (by changing attitudes, challenging men’s demand, and cracking down on pimps and profiteers); to prevent women and girls getting sucked into it; and to provide those that do with real alternatives and genuine routes out. However, while prostitution exists, there must also be harm reduction services.

All the main cities in Scotland should have centres that are open and staffed 24/7 – providing harm reduction facilities for women to shower, eat, watch TV, change clothes, rest, talk, and get condoms, and benefits, housing and legal advice, etc. While commitment to exiting should not be mandatory, exiting services must also be available – either in the same premises or separately – and women should always be made aware of these services.

¹⁵ <https://www.gracechocolates.co.uk/>

¹⁶ <http://nordicmodelnow.org/2017/11/14/how-a-nordic-model-approach-to-tackling-prostitution-was-implemented-in-ipswich/>

¹⁷ http://ueaeprints.uea.ac.uk/id/eprint/55750/1/EVISSTA_paper.pdf

These centres could have workers (or mobile units) that travel to outlying areas as needed. Workers would need to be proactive in reaching out to women involved in prostitution in rural and remote areas, but this is necessary everywhere now that most prostitution takes place indoors.

Another option would be the provision of hostels in the main population hubs where women from rural and remote areas could stay while they access services. These services should be in alignment with existing provision for other services, such as free travel for domestic abuse victims.

It will often be the case that the best placed to offer these services are third sector organisations who have contact with women. This is especially true as many women involved in prostitution may feel afraid of the state providing the service. However, this means that the Scottish Government must take care to only fund third sector organisations that agree with the Equally Safe understanding of commercial sexual exploitation, including prostitution, as a form of gender-based violence.

Organisations which are ideologically committed to the full decriminalisation of the sex trade, including pimps should never be funded. Services that are underpinned by these attitudes usually serve to prolong women's involvement in the industry and to maintain a thriving sex trade.

Question 9. If there are any further comments you would like to make, which have not been addressed in the questions above, please use the space below to provide more detail.

We strongly commend the Scottish Government's Equally Safe strategy and its understanding of all forms of commercial sexual exploitation, including prostitution, are a form of gender-based violence against women and girl. We strongly encourage the Scottish Government to be bold and now put that understanding into practice for the benefit of all of Scotland's citizens. We understand the costs associated with such measures but believe the abuse done to women at the moment in Scotland is too great not to act.

As Christians we desire the good of everyone in our society – all human beings are inherently valuable and deserve to be treated with dignity. Prostitution undermines this by treating women as commodities rather than as people. Women trapped in prostitution are particularly vulnerable. They have usually been coerced or trafficked into it and then become trapped. Proverbs 31:8-9 tells us to “Speak up for those who cannot speak for themselves, for the rights of all who are destitute. Speak up and judge fairly; defend the rights of the poor and needy.” We as a church are concerned to speak up for those who have been prostituted. We believe those trapped in prostitution should be decriminalised and offered support to exit prostitution. Alongside this we believe those who buy sex should be criminalised and there should be stronger penalties for third parties who profit from other's prostitution.