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Home Affairs Committee

Oral evidence: [Human Trafficking](#) - 07 06 23, HC 1142

Wednesday 7 June 2023

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Watch the meeting

Members present: Dame Diana Johnson (Chair); Lee Anderson; Paula Barker; Simon Fell; Carolyn Harris; Marco Longhi; Tim Loughton; Alison Thewliss.

Questions 125-305

Witnesses

[I](#): Neelam Patankar, Managing Director, Digital Ventures, Professor Teela Sanders, Professor of Criminology, University of Leicester, and Dr Ben Brewster, Research Fellow in Modern Slavery Perpetration, Rights Lab, University of Nottingham.

[II](#): Rhoda Grant MSP.

Written evidence from witnesses:



Examination of witnesses

Witnesses: Neelam Patankar, Professor Teela Sanders and Dr Ben Brewster.

Q125 **Chair:** Good afternoon and welcome to the Home Affairs Committee. This is the fourth evidence session in the Committee's inquiry on human trafficking. This afternoon, we will discuss the role of technology in facilitating trafficking. An important part of the chain of human trafficking is the use of online technology, particularly when it comes to victims of sex trafficking being advertised to potential sex buyers. Evidence given to this inquiry suggests that victims of sex trafficking are commonly advertised for exploitation on pimping websites, also referred to as adult services websites—commercial websites dedicated partly or solely to hosting adverts for prostitution.

We have a number of witnesses with us this afternoon. Unfortunately, Dr Ben Brewster is held up in our security line; we expect him to join us shortly. Could I ask our other witnesses to introduce themselves to the Committee? Professor Sanders, would you like to start?

Professor Sanders: Thank you, Chair. My name is Teela Sanders. I am a professor of criminology at the University of Leicester, and I have been working in research on the sex industry for 25 years.

Neelam Patankar: I'm Neelam Patankar. I am representing Vivastreet, where I am the managing director. We are an online classifieds platform that hosts adverts for goods and services, including adult services.

Q126 **Chair:** Neelam, we know there are obvious indicators—red flags, if you like—of trafficking and other criminal activity on these websites. We have been told that those would include: a man placing or paying for a prostitution advert for a woman; an individual paying for or managing the adverts for multiple women; or the same phone number being listed in the adverts for multiple women. Those would be quite obvious signs. Does Vivastreet allow any of those practices?

Neelam Patankar: I think it would help the Committee to understand our entrance into this space, and more importantly, how we tackle some of the areas that you have spoken about. Vivastreet, as I mentioned, is an online classifieds platform. We operate in, I guess, a more traditional sense, but we found sex workers attempting to post adverts in our adult dating category. At the time, we sought legal guidance, and we created what is known today as our escorts and massage category.

It was very simplistic to think we could simply create a category and that would be it. We very quickly understood how incredibly complex this area of work is, the enhanced need for safety, and the duty of care that we have as a business. It really embarked us on our mission of ensuring safe, trusted advertising, free from stigma. As you rightly pointed out, this can be exploited, and you have set out some of the indicators. As a business,



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we have a vast range of measures in place to tackle, identify and disrupt this type of behaviour. If I may, I will talk to you about some of these measures, including on the phone number indications.

Q127 **Chair:** We are limited on time, because we are expecting votes at 4 o'clock, so could you address the question I asked, about men placing adverts and the use of the same telephone number for multiple adverts? That would be helpful.

Neelam Patankar: Yes, I will definitely keep it as concise as I possibly can. As mentioned, this is incredibly complex; you have probably heard several times how complex human trafficking can be. That is also very true of the nature of sex work.

Regarding phone numbers being used multiple times, yes, that is an indication of human trafficking, and it is one that we manage and monitor within the business, but it is also true that some people in sex work have multiple phone numbers. We have a safeguarding team in our business that is dedicated to reviewing, exploring and investigating any suspicious behaviours, such as those that you mentioned. This team comprises many different skillsets, ranging from ex-law enforcement and data analysis skills to customer service skills. The team will explore proactively any potential indications of human trafficking, and then work with a law enforcement unit that we refer to as TOEX, which is Tackling Organised Exploitation. They cover a vast range of exploitation, including, thinking specifically of Vivastreet, sexual exploitation and human trafficking.

Once we have assessed the indicators that you mentioned, we will provide that data to TOEX, which will manage that request. It will then come back to us through a police request, if appropriate. Those are the areas of information that we provide, but it is really important to understand that this is an incredibly complex space, as we acknowledge, and anyone operating in it must be aware of the risks.

Q128 **Chair:** Are you saying that the indicators that I just asked you about would be identified by your team, and the adverts would not get on to your website?

Neelam Patankar: It would be identified in a number of ways. First and foremost, we have a partnership with the world-leading anti-trafficking software provider, whose work includes them scanning the entire internet for problematic material. That problematic material is then fed back to Vivastreet. We will upload that dataset into our processes and systems.

Q129 **Chair:** I am still not quite clear. I have asked you specifically about men placing or paying for an advert for a woman; an individual paying for a number of different adverts; or the same phone number being used repeatedly. Are you saying to me that those adverts would never get on your website?

Neelam Patankar: A male paying for an advert, we do not allow. That is not something that we accept on Vivastreet. An advertiser who has several



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phone numbers, however, comes under the complexity of sex work, I am afraid.

Q130 **Chair:** A man placing an advert for lots of different women—

Neelam Patankar: Would not be accepted on the platform today.

Chair: You would not allow that. Yet your modern slavery statement states that you allow men to advertise women for prostitution and suggests that you allow individuals to post adverts of multiple different people. That's what your modern slavery statement says.

Neelam Patankar: That we allow males to pay for—that's not correct, no.

Q131 **Chair:** That's not correct. So your modern slavery statement is not correct?

Neelam Patankar: I can double-check and see if there is a typo. I can ask my team to look at that, but we do not allow males to pay for women, no.

Q132 **Chair:** Oh. Today I had a look at Vivastreet. There are 14,065 adverts listed under the category that you have described, "UK Escorts & Erotic Massage". I searched for adverts in my own city of Hull and found 59 adverts listed for Hull. Of the 59, 27 raised my concern straightaway: either they shared a phone number with another advert, or they used duplicate text, suggesting to me that someone was copying and pasting. Could you explain to me how those adverts have been allowed to get on to the website?

Neelam Patankar: Yes. As part of Vivastreet and how we operate—on the adverts that you have referenced, it could definitely be true that you have identified adverts that have a shared phone number or a copy and paste of an advert. There are two parts to understand here: one is genuine sex work behaviour, and two is the processes that we have within the business. Said advert would then be vetted through automated moderation, manual moderation and a number of safeguarding processes that our business has.

Q133 **Chair:** So you're saying that these 59 adverts that I'm concerned about have gone through all your vetting procedures and you're fine with them—they can go up.

Neelam Patankar: They would have gone through our vetting procedures—correct. If, somehow, there is an instance in which there is an air of suspicion—that would have been managed by the safeguarding team that I was referencing. This safeguarding team will still—if it somehow has missed our automated moderation, if it's somehow missed by our human, manual, moderation, if it's somehow missed through various other processes—

Q134 **Chair:** It's 50%—over 50%—of the adverts in Hull that I was concerned about, so I have sent that information to Humberside police this afternoon.



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Neelam Patankar: Excellent. May I just continue? If it has missed all those processes, our safeguarding team will be assessing those adverts, and we have a very—

Q135 **Chair:** So you're going to go away and assess those, are you?

Neelam Patankar: They already would have. We have an incredibly low threshold.

Q136 **Chair:** Really?

Neelam Patankar: Part of when we refer content and data to the police is that we are asked explicitly by law enforcement to keep these advertisements live on our website. The reason why they would want them to continue to be live on our website is to not disrupt any investigation and alert the people. I understand it's incredibly uncomfortable to view when you can find adverts that potentially have harmful indicators, but, for law enforcement to conduct their investigations, it's important that we don't disrupt that or alert people by removing them.

Q137 **Chair:** So you're telling me that all the cases that I have referred to, these 27 cases, are all under investigation by Humberside police.

Neelam Patankar: Not at all. It could be that they are under investigation—

Q138 **Chair:** It could be, or it could be that they have just got through the system that you say works so effectively.

Neelam Patankar: Or it could be that they are genuine sex workers.

Q139 **Chair:** We have a number of questions, so I just want to ask you a couple of other things. A BBC "Panorama" investigation into Vivastreet discovered that one phone number had been used in 78 adverts. What do you say about that?

Neelam Patankar: That is a documentary that I obviously have viewed and was incredibly uncomfortable in viewing. On the 78 phone numbers, we did request the data from the BBC to understand how that has managed to happen.

Q140 **Chair:** But you're the company that allows these adverts to go up. Why are you asking "Panorama"?

Neelam Patankar: We have asked for the data because it is very important for us to learn from anything that has happened incorrectly, and unfortunately we were not provided with that information. When assessing our own dataset, we try to replicate, and the reason we asked the BBC is that we couldn't replicate the 78 phone numbers. But to be perfectly honest, we should have verified every single phone number—we definitely should have. The business has been so focused on some of the bigger safeguarding items that, if I'm honest, that was completely missed on our side.

Q141 **Chair:** Seventy-eight numbers—really? Last, I want to ask you about this.



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In 2017, nine men were convicted of trafficking young Romanian women around the north-west of England for sexual exploitation. One of the traffickers was found to have spent £25,000 advertising victims to sex buyers on your website. Police have revealed that this high level of spending by one man on prostitution adverts for multiple women prompted your company not to refer this man to the police, but, to actually give him his own account manager. Could you explain that to me?

Neelam Patankar: Yes. As I said, on our entrance into this space, we operated very naively once upon a time. Unfortunately, the case that you are referring to does exist, and has existed, on Vivastreet. Like I said, it was a time when we operated extremely naively. We do not have account managers today. We have learned, we have understood and we have adapted our processes.

Q142 **Chair:** So there are no account managers now.

Neelam Patankar: We do not have account managers today, no.

Q143 **Chair:** How many adverts would a man have to place on your website in order for you to be concerned?

Neelam Patankar: We do not accept male adverts.

Chair: Despite saying in your modern slavery statement that you do.

Neelam Patankar: I can certainly go away and double-check that; it may be a typo on that statement. But Vivastreet has evolved since first entering this space. We have learned. We have incredibly vast amounts of information. Our work with the Home Office and the National Crime Agency has really informed some of the safeguarding processes we have and accelerated that.

Q144 **Chair:** Okay, I have heard what you have to say about that. I think we will move on, but I just want to say that Dr Brewster is now in the room. Would you like to come and join us, Dr Brewster? We apologise—we have votes at 4 o'clock, so we started a little early. Apologies for that. Would you like to introduce yourself to the Committee?

Dr Brewster: Good afternoon, everyone. Sorry for being a little late. I am Ben Brewster. I am an academic from the University of Nottingham's Rights Lab, where I lead our work on technology and exploitation.

Chair: Thank you very much.

Q145 **Carolyn Harris:** Let's stay on Vivastreet. In 2018, the Paris public prosecutor's office opened a criminal investigation against Vivastreet on charges of aggravated pimping. Shortly after this, Vivastreet suspended the dating section of its French website, which included the erotica advert listings. How far has that investigation gone? What is the latest news on it?



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Neelam Patankar: For France, any interaction was prior to my position in post, I'm afraid. I am aware of the same information that you probably are. I cannot really give you anything more than that, unfortunately.

Q146 **Carolyn Harris:** What is your role in the company?

Neelam Patankar: Managing director.

Q147 **Carolyn Harris:** You don't know what is going on with the public—

Neelam Patankar: This was prior to my position in post.

Q148 **Carolyn Harris:** You have taken on the role, but you have not made any inquiries as to what has happened with a criminal investigation against the work that you are doing.

Neelam Patankar: For France, as I said, it was prior to my position in post. A lot of our work and a lot of our efforts—we are a global marketplace—is very much centred on the UK and ensuring we have robust safety measures.

Q149 **Carolyn Harris:** Who owns Vivastreet?

Neelam Patankar: That is public information.

Carolyn Harris: If it is public information, who owns it?

Neelam Patankar: Mr Pons.

Q150 **Carolyn Harris:** And what companies are connected to it?

Neelam Patankar: In what regard?

Carolyn Harris: Does he own any other companies?

Neelam Patankar: We have many brands. The brand that I am responsible for is Vivastreet, and we have 15 marketplaces across the globe.

Q151 **Carolyn Harris:** Do you allow anonymous payments on your website, or do you have to verify your identity in order to be able to make a payment to Vivastreet?

Neelam Patankar: For every single transaction on Vivastreet, you must use a credit or debit card so that we can catch your digital fingerprint.

Q152 **Carolyn Harris:** So you cannot do it anonymously.

Neelam Patankar: We do have an anonymous payment method, but before you can access that anonymous payment method, it is incredibly important that the user transacts through a credit or debit card so that we can unlock the identification of who is posting.

Q153 **Carolyn Harris:** Why would you want to have an anonymous payment platform?

Neelam Patankar: It comes really to the heart of sex work by genuine, independent sex workers. They have wanted to use an anonymous



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payment method. Their families may not know what they do, and they do not want their identity to be shared in that way.

Q154 **Carolyn Harris:** Don't you think that is an opportunity for traffickers to be able to exploit your system?

Neelam Patankar: For anyone seeking to exploit, definitely, which is why we have introduced the first credit card or debit card, so that you are not anonymous when using Vivastreet.

Q155 **Carolyn Harris:** How many people work in Vivastreet?

Neelam Patankar: We have around 75 based in London.

Q156 **Carolyn Harris:** And what do they do?

Neelam Patankar: Traditional business roles. That can go from technology through to our safeguarding hubs, moderation and customer service.

Q157 **Carolyn Harris:** How many moderators have you got?

Neelam Patankar: Twenty-five.

Q158 **Carolyn Harris:** So you have 25 members of staff all moderating. What are they actually moderating?

Neelam Patankar: All content on the platform. For us it is very important. Technology has evolved, so yes, we do leverage a third-party provider to handle the automated side of moderation. But for us it is incredibly important that we balance that also with having humans view the content.

Q159 **Carolyn Harris:** Putting cards up in telephone boxes is illegal. Do you not think that Vivastreet has circumvented that by allowing people to do exactly the same thing as going to a telephone box and looking for women who are advertising, or somebody else who is advertising a woman's services?

Neelam Patankar: I think the move to sexual services being online has changed the way that sexual services or someone providing sexual services operate. It has made it safer. A sex worker now has a choice. They can decide who they are seeing, when they are seeing them and also have the option to say no, which I am sure we can appreciate is easier to do on a phone call than face to face. We unlock digital tools for sex workers. We have partners that provide a range of safety measures. The UK support services are very fragmented, especially for sex workers. If you are an advertiser or—

Chair: Can I stop you there? We are not talking about sex workers; we are interested in women who have been trafficked, so let's just get that clear, please.

Q160 **Carolyn Harris:** I would argue that the majority of women whose services are advertised on your site are women who have been trafficked, maybe not from another country to this country, but trafficked by a



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person into selling their bodies, and they themselves are probably not making any money from this. This is exploitation. Do you not accept that Vivastreet facilitates that through it being a pimping organisation?

Neelam Patankar: We are not a pimping organisation; we are an online classifieds website, first and foremost. You are correct that there is an avenue that can be exploited here, and I think any business that operates within this space needs to acknowledge that and understand the risks involved, because once you acknowledge and understand the risks involved within this space, you can have the right measures. For us, it all comes back to being a safe, trusted advertiser.

Q161 **Carolyn Harris:** Okay, so the women who are being advertised for sale, what work are you doing with them? Are you actually contacting those women and asking them whether they are aware, happy, prepared? Have they made the decision to be on your site as a commodity? Have they personally made that decision, or has the advert come in from a third person who you have done your verification checks with?

Neelam Patankar: We have a vast number of measures in place. For the example you are giving, we have incredible partners on the platform. We have worked with Justice and Care and STOP THE TRAFFIK to support our knowledge and awareness and understand how we can support better within this space.

Q162 **Carolyn Harris:** Do you do interviews, cold calls, whatever, with the women who are being advertised on your site as a commodity to be sold for sex? Are you as an organisation doing those welfare checks with the individual women, or do you just follow the advert, and if the advert passes, it goes on your site?

Neelam Patankar: We outreach to our community constantly.

Carolyn Harris: Do you do interviews with—

Neelam Patankar: If I may, we outreach to the community regularly. It is a big ethos of the business to understand our customers better, so yes, we do conduct regular surveys; yes, we do have phone calls to our customers; and yes, we do speak to the customers who are independent sex workers on our website to better understand what their needs are. It is very much how this business has evolved from where we were to who we are today of simply opening a category to working with the National Crime Agency, the Home Office and industry partners, such as National Ugly Mugs and Unseen, the modern-day slavery helpline. We have a vast number of partners in place that have helped inform us and improve and accelerate the measures we have while we operate here.

Carolyn Harris: No more questions, Chair.

Q163 **Chair:** I have just checked the modern slavery statement I referred to. In it, you have a case study that you use to reference your approach. Can I read this to you? It is case study 2. It says, "A male customer phoned Vivastreet's customer service team regarding an issue with an online adult escort advertisement that he had placed on the platform." You are



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using that as an example of a case, so that completely contradicts what you have told this Committee that you do not allow men to place adverts.

Neelam Patankar: The nature of trafficking, as I think has been established prior to this session, is generally towards the females. In that instance, no, a male cannot post or pay for an advert. If it is a male sex worker, yes.

Q164 **Chair:** It is a case study—it is your case study in your modern slavery statement referring to a man who has placed an advert on behalf of a woman, and you have just told the Committee that that is not allowed.

Neelam Patankar: It is not.

Q165 **Chair:** But it is in your statement. This is your modern slavery statement. It is a case study that you are referring to.

Neelam Patankar: Yes, so it is not permitted. Historically, once upon a time, yes, did we and have we learned from that? Yes.

Q166 **Chair:** But this is dated 24 March 2023.

Neelam Patankar: I would need to double check that statement in case there was a typo or something of that effect. I am incredibly sorry if I can't—

Q167 **Chair:** It is signed by two directors of the company. Did you sign this?

Neelam Patankar: I would need to double check that.

Q168 **Chair:** You do not know whether you signed the modern slavery statement, and you are the chief executive, are you?

Neelam Patankar: I am the managing director.

Q169 **Chair:** You are the managing director, and you don't know whether you have signed a statement.

Neelam Patankar: Where a male has been referenced—I would need to double check that. I am incredibly sorry. As I have said, the nature of sex work is incredibly complex. I appreciate that we are here to talk about exploitation, but it is important that we understand that this is an area—

Chair: It is very important that you do not mislead the Committee. I asked you a specific question. I have referred to a document that your company produces that contradicts what you have told this Committee.

Q170 **Tim Loughton:** I was not aware of the site, so I am interested in getting a better understanding of what it does. What was your turnover last year?

Neelam Patankar: Our accounts are publicly reviewed. We have disclosed our profit.

Q171 **Tim Loughton:** I am not aware of your company, so I have not looked at your public accounts. What was your turnover last year?

Neelam Patankar: £25 million.



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Q172 **Tim Loughton:** How much of that turnover came from adult services advertising?

Neelam Patankar: We are a global brand. As I said, we have 15 markets across the globe. Adult services advertising is not something we specifically break down in our accounts, I am afraid.

Q173 **Tim Loughton:** Why don't you break it down? Why wouldn't you produce that as a public figure? You must know that figure, yes?

Neelam Patankar: Unfortunately, as there are other operators in this space—larger and bigger operators than us—due to commercial sensitivity that is not something that we disclose publicly. In answer to your question, to give you some idea, it is fair to say that it is the majority.

Q174 **Tim Loughton:** So over half of your revenue comes from adult services advertising?

Neelam Patankar: That would be fair to say.

Q175 **Tim Loughton:** Indeed, looking at your website, 18-plus or adult services are top of the list of what you do. The majority of your income comes from adult services. That is your priority area, effectively.

Neelam Patankar: Because of the risk and the need to be able to manage this, it is an area that we focus on heavily.

Q176 **Tim Loughton:** To give me some understanding, what can I advertise on your website under adult services?

Neelam Patankar: You are able to advertise yourself as an escort or a provider of massages within the adult section.

Q177 **Tim Loughton:** What detail could I go into on the nature of the services that I offer?

Neelam Patankar: We have our posting guidelines and rules that must be applied. You can describe yourself, and you can describe the nature of your service. We do not allow fully explicit content, but you can describe the nature of your service.

Q178 **Tim Loughton:** If I were an adult woman, the fact that I was offering sex services would be made very clear in the advertising. Okay. On the basis that you know that the majority of sex services are offered online in this country, and a substantial part of those services are offered by women who have been trafficked, you will be aware that this is not a complex area, as you constantly say it is, but a deeply problematic area. There is a high likelihood that the people advertising on your site, who may or may not be women, may be the victims or beneficiaries of trafficking. Is that fair to say?

Neelam Patankar: I think it is fair to say that there is a problematic area in this—100%.

Q179 **Tim Loughton:** What safeguards do you have? The minute somebody inquires about advertising on your website, what safeguards are there to



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ensure that the person is advertising of their own free will, for legitimate and legal reasons, as they see it, and not under duress from a pimp or a trafficker? What safeguards do you institute?

Neelam Patankar: Our safeguarding team is probably the most relevant thing to discuss here. First, as has been mentioned, we work with the world's leading anti-trafficking technology and software company. Where they have identified, with high probability, highly problematic material, it will not be allowed or permitted on our website.

Q180 **Tim Loughton:** What is highly problematic material?

Neelam Patankar: Where they have assessed that it is highly probable that the data provided to us is from a human trafficking or organised crime group. Those details cannot then come on to Vivastreet. In the first instance, there is a barrier to entry.

Q181 **Tim Loughton:** What information would you then cap?

Neelam Patankar: I cannot go into too much detail because this is a public forum, but the main identifier is the phone number. It is the phone number.

Q182 **Tim Loughton:** Let's do some role play; that might get to the nub of what we are doing. I am an Albanian criminal trafficker. I have several Albanian women in their 20s whom I have trafficked to this country, and I am profiting from their activities in the sex trade. I approach Vivastreet to put up an advert, pretending to be a 23-year-old Albanian woman offering sex services. How would you reveal me as not being the person in that advert?

Neelam Patankar: First and foremost, we stop any high-risk human trafficking countries from accessing Vivastreet. Let's say that you're in the UK and you've managed to access Vivastreet. We have a number of processes in place. The scrutiny you would be under would be dependent on the behaviours you demonstrate. If you were to demonstrate some of the indicators—if you do not speak English, or show some of the indicators just mentioned by Dame Diana—we will contact you and ask you for ID and proof of address. We will verify you in some way, shape or form. There are various layers—

Q183 **Tim Loughton:** I am an Albanian citizen who is legally in the United Kingdom. I speak good English and I am profiting from trafficking Albanian women who are here illegally and who will be in the sex trade. How do you identify me?

Neelam Patankar: It still depends on the behaviours you demonstrate. Yes, you speak good English, but there could be a number of indicators. In your instance, you would be a male payer, and that would not be accepted and would be stopped.

Q184 **Tim Loughton:** How do you know that I am a male payer?

Neelam Patankar: When you input your details to pay for the advert.



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Q185 **Tim Loughton:** I use a false name. I have a name that could be a woman's or a man's name.

Neelam Patankar: Unfortunately, there is a loophole there. You are completely correct, and that can be bypassed.

Q186 **Tim Loughton:** If I described myself as "Nic"—so, I could be Nicholas or Nicola—you would accept that?

Neelam Patankar: We would still assess it. It would still come up to the team as a gentleman's name, so that would be assessed and blocked.

Q187 **Tim Loughton:** Hold on. I could be using a woman's name. I could be Lesley. How would you automatically know that I am not a woman and how do you know that I am not using a false payment card?

Neelam Patankar: If you came through just as "Nic", as you mentioned, it would still come back to the team for intervention and to be checked up on. That is why having a human safeguarding process is so important to us. On stolen cards, a number of processes go behind fraudulent payments. We have a payment process, and we have payment processing systems in place, and we have a huge number of velocity rules. As a business, our mission is: safe, trusted advertising, free from stigma. Every process is centred on being as safe as we possibly can.

Q188 **Tim Loughton:** You say that, but I am trying to work out what it actually means in practice. I am an Albanian, in the United Kingdom legally. I have a debit or credit card that I have obtained legally that may be in the name of a woman, and I am seeking to place this advert. How do you stop me?

Neelam Patankar: As I said, there are a number of known behaviours you would have to demonstrate. Language we have identified—

Q189 **Tim Loughton:** We have dealt with every behaviour so far and you have not trapped me on any of them. How are you going to trap me?

Neelam Patankar: We have identified language.

Q190 **Tim Loughton:** I speak English very well.

Neelam Patankar: The fact that you are male has been identified. If you were to use multiple phone numbers, there is—

Q191 **Tim Loughton:** I am using one phone number for one woman, or one phone number for one woman who could turn out to be a whole team of women if I get multiple calls back to me.

Neelam Patankar: Again, it is very much dependent on the behaviour you demonstrate on the platform.

Q192 **Tim Loughton:** You keep saying "behaviour". I am giving you examples of a person who is trying to commit criminal activity as a trafficker. I am trying to work out how you would identify and therefore prevent and report me. So far, I am getting away with it. Where would I get caught?



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Neelam Patankar: So far, you would have had to pass the world's leading anti-trafficking technology. You would have had to pass the payment team. You would have had to pass some moderation. You would have had to go—

Q193 **Tim Loughton:** Passing your moderation, okay. What is the moderation that I may get stuck on?

Neelam Patankar: As I mentioned, we operate through a combination of automated moderation and manual moderation. Our automated moderation tool understands through volume what we accept and what we do not. That very much scans and looks at the text you are putting in your advert. Let's say that you have passed our automated moderation, and you have somehow passed our manual moderation and our safeguarding team. On every single advert Vivastreet has, there is a button to get you through to Unseen, the modern-day slavery helpline. I understand from the example you are giving—

Tim Loughton: There is a button to get you through to—

Neelam Patankar: To report an advert that you have seen—so that you can get through to Unseen, our modern-day slavery helpline.

Q194 **Tim Loughton:** Why would I report my own advert that I am trying to place?

Neelam Patankar: Well, it is for anyone else who may think it is problematic.

Q195 **Tim Loughton:** Okay. At what point in my trying to place an advert—I might actually be a trafficked woman—are there warning signs on your site saying, "If you are doing this under duress, or if you are not a legitimate person, here is the trafficking helpline," or whatever it may be? Where do those warning signs appear?

Neelam Patankar: They sit in two areas. One is front-facing: there is a safety centre on every single advert that talks about the signs of exploitation and who you can speak to. There is also an area within our membership area. Once you have created an account and created an advert, there is log-in access, and there is signposting there, too. If you will forgive me, I think the point that you are trying to get to is, "Is it possible?" Unfortunately, there is risk, and there is an area of exploitation that can be had in this space. That is why we have invested so much time in deeply trying to understand and work with the Home Office and the National Crime Agency to accelerate our measures and ensure that we operate as a responsible operator in this space.

Q196 **Tim Loughton:** I am sure you want to say that, but how many potential traffickers or pimps have you actually identified and then reported?

Neelam Patankar: First of all, I would hope there are not any on Vivastreet, but—

Q197 **Tim Loughton:** No, no—hold on. We have just gone through this whole



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exercise in which I am a genuine trafficker who is finding it very easy to evade all your safeguards—your wonderful safeguarding teams and your moderation and everything else—but I eventually get caught, somehow. How many people like me have been caught and subsequently reported to the National Crime Agency?

Neelam Patankar: We work with law enforcement. I think it may help to talk about how we work with law enforcement and some of the reports that we do.

Q198 **Tim Loughton:** How many people like me have been reported to the National Crime Agency?

Neelam Patankar: We don't know—

Q199 **Chair:** You don't know?

Neelam Patankar: In the scenario that you are providing of being a human trafficker, I would hope to say there aren't any on Vivastreet. Unfortunately, we know this space can be exploited. It is why we work with the National Crime Agency and with law enforcement.

Paula Barker: How many has your company reported to—

Chair: Order.

Q200 **Tim Loughton:** Those two statements do not go together. You say that your site is vulnerable to being exploited by people like me, by its very nature, and it is all very complex. We agree with that. Then you say you hope that people like me don't use your site. Well of course people like me use your site. If your systems, your safeguards, your checking, your moderation are worth a penny, then you will have caught some people, and hopefully those people have been reported to law enforcement agencies on suspicion of being traffickers and criminals. You should know, therefore, how many your organisation have referred to the police. It is a simple question. It may be that they are found to be not guilty, ultimately, but how many have you tracked and then referred to the police?

Neelam Patankar: In terms of our work with TOEX, the Tackling Organised Exploitation unit—that work where our safeguarding team proactively refers to that unit—it is very important to understand that we have an extremely low threshold. I would like to make that very clear. We do proactively report areas of information. Last year, we reported 1,000 proactively. That does not mean 1,000 cases of human trafficking; it is 1,000 cases where we have had some suspicion of some of the behaviours that you mentioned, and ensured that it has gone to the right unit and the right people to—

Q201 **Tim Loughton:** Okay. I don't see why it was so hard to get that figure. You have reported 1,000 people. How many adverts have been placed in the last year in this area?

Neelam Patankar: On average, in the adult section, we have around 13,500 live adverts.



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Q202 **Tim Loughton:** How many different adverts is that throughout a year? Obviously, they will not be there for the whole year.

Neelam Patankar: It was roughly 300,000 last year.

Q203 **Tim Loughton:** Okay, so last year you reported as suspicious 1,000 people trying to place an advert out of a potential 300,000-plus who did place adverts. That is a 0.3% interception rate. Do you think that is a fair reflection of the number of people who are using your website illicitly and are involved in trafficking?

Neelam Patankar: I think it is a reflection of us having a low threshold and reporting that amount of users, yes. I appreciate we are here to talk about exploitation. I don't know if any of the academics—

Chair: Yes, we are going to come to them. Tim, are you okay for us to move on?

Tim Loughton: Well, I'm not okay, but let's carry on.

Chair: Can I ask that we keep our answers and our questions quite short?

Q204 **Alison Thewliss:** Ben, may I ask you for a bit more information on technology and online platforms? Can you tell me a bit more about the type of technology that traffickers are using? Is the Government's Online Safety Bill keeping pace with the different ways in which they operate?

Dr Brewster: Generally, evidence—when I say "evidence", I mean strong, systematic reporting data—on the extent to which trafficking is facilitated through online platforms is incredibly anecdotal. Specific cases that get brought to the attention of the media or the public tend to be the focus of our attention. On the nature and extent of this, we do not really have any numbers, but we see anecdotal examples cropping up from every platform that would spring into your head. They cover recruitment to all types of exploitation, from sexual exploitation to child criminal exploitation through, say, county lines, and deceitful recruitment ads into exploitative employment and labour. Although we do not have a great understanding of the exact scale and nature of this, it is happening everywhere you think it is and would expect it to be.

There are a lot of promising things in the Online Safety Bill, in terms of reducing reliance on the self-regulation of platforms when it comes to their duty to report, and to notify of issues, including trafficking. There is no one country that I would say is really leading on that.

Q205 **Alison Thewliss:** In this country, there tends to be lots of emphasis put on laws and not enough on enforcement of them. Would you agree that that is likely to be the case with the Online Safety Bill?

Dr Brewster: Absolutely. Enforcement in this domain is incredibly difficult because of the volume of content that we are talking about when it comes to large-scale platforms such as Meta and Twitter. There is the question of the capacity needed in order to enforce. That applies to the platforms and their moderation and protection mechanisms, and to the follow-up, once



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reports have come through to law enforcement and other services. Take the example of child sexual exploitation and abuse material—a lot of the promising work in this area comes from there. One of the huge issues it deals with is volume. In the US, there is a mandate on US-based electronic service providers to report CSE material to the National Centre for Missing and Exploited Children. It deals with millions of reports every year, and so few of those are triaged and followed up by law enforcement, because the capacity just does not exist. You can imagine that if a similar model was replicated here, we would have similar issues.

Q206 Alison Thewliss: Would it be worth putting more money into that side of things?

Dr Brewster: Absolutely, yes.

Q207 Alison Thewliss: Have the Government taken account of that and budgeted for it, do you think?

Dr Brewster: I am not aware of the current status on that, unfortunately.

Q208 Alison Thewliss: Professor Sanders, you were nodding.

Professor Sanders: Yes, definitely, on the huge amount of data that is coming to law enforcement. I am reporting on a project that is still live in which 23 police forces, including TOEX, are being interviewed on how they engage with ASWs on these investigations. It is very much the tip of the iceberg. They have a huge amount of data sent to them. One of the reasons why they want ASWs to be kept open is that they are a window into exploitation, so police can see what is happening. Lots of strong reporting comes from the main ASWs to the police, who can then investigate. Those investigations often take two years; they are very long term and intensive, and are cross-country, or cross-nation. It really is a resource question to get to the bottom of some of these very complex OCGs.

Q209 Alison Thewliss: Would you say the traffickers really have the advantage here?

Professor Sanders: Most definitely, in many ways, because they are hidden. They are often not in this country, or are being controlled from outside this country. There are concerns about when you should disrupt activity so as not to put people in harm's way; how welfare checks for individuals can be done; and when it is right to collect evidence, and what the right amount is. It is very difficult for law enforcement. A point repeated by all the forces we spoke to was on the real difficulty in using the Modern Slavery Act in prosecution, because there is such a high threshold for evidence. Often, other types of legislation are used, particularly the Sexual Offences Act 2003, or even money laundering legislation, because of their much lower levels of evidence gathering.

While there is a real lag, and not many things are coming to court—prosecutions are very low in this area, as we know—I think the police felt that some of their activities were about disrupting offenders rather than prosecuting and going through the criminal justice system—that lots of



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their investigative work and their surveillance of what was going on did more to disrupt than lead to prosecution.

The tip-of-the-iceberg issue, particularly if we are thinking about the Online Safety Bill codes of practice that are to come out, is where is that huge amount of data going to go to? If it is mandatory that websites have to report information, which seems like a very good idea, where is that information going to go to, and how is it going to be looked at? What are the real operational issues here? What are the challenges here to get to the bottom of such huge amounts of data?

Q210 Alison Thewliss: One of the many aspects of the Illegal Migration Bill that trouble me is that victims of trafficking will be removed from the country unless they are able to help the police with their inquiries. From your experience, how much knowledge are victims likely to have? Would they meet that threshold of being able to stay?

Professor Sanders: That is a really good point, which has been repeated to us before. Our partner on this project is Unseen, the modern slavery helpline. The police and practitioners in the study said that most investigations and cases that are brought to court are victimless prosecutions, because victims do not want to engage; they do not want to give evidence. They want to leave the situation they were in and move to a safer situation, often staying in sex work; they just want to leave the context in which they were in. There is therefore a real issue with victimless prosecutions.

There is also lots of criticism about the national referral mechanism. The police are saying that often it took 500 days for a decision, and that the Crown Prosecution Service will not look at a case until the national referral mechanism has had its look, so this is really long term and victims have just gone—gone into worse situations, returned home, or just cannot be found. There is that real issue of what is happening to the victims.

Q211 Alison Thewliss: Do victims know very much about the operation that has held them?

Professor Sanders: There is really good partnership work from the police, which was discussed—there are lots of really great examples of partnership work across the country—but the numbers of people that they are actually engaged with and of cases are really quite small. It is hard to keep in contact with victims as victims want to move away, so it not particularly a success story on that side, despite the efforts from the police and NGOs.

Q212 Simon Fell: Neelam, I am really interested in understanding the relationship between your organisation and law enforcement and what the process of making a report from Vivastreet to law enforcement looks like. I am also interested in whether you get feedback the other way as well—the police sending new alerts about people on your platform.

Neelam Patankar: Yes, we have always co-operated with law enforcement. In the most basic form, that could be on inbound requests.



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As I mentioned, we have a dedicated team—our safeguarding team—and a dedicated email address and a dedicated phone line for police. What that could look like is that the DPA or DPO is received requesting information. Our team then provides that information, and the individual who has conducted that report will be on hand, by phone or email, to follow up and talk to throughout that investigation.

Our work goes from the basic reporting all the way through to training. We have received training from the National Crime Agency—and STOP THE TRAFFIK, but law enforcement specifically—and we have also provided training in terms of what information we have and can see. Our collaboration has then involved the National Police Chiefs' Council, which holds a conference every single year. We present to that to talk about what we do as a business, how they can see indicators of things and what is publicly available within the business. We also talk about what information we hold, because sometimes it can be confusing, and what information can really help them.

Feedback is incredibly important to us. We ask law enforcement for feedback continuously, for any interaction that we have. The feedback loop, which needs to come back into the business so that we can improve our systems and processes, has improved in the time that we have been working with the police. We receive more feedback now than we did a few years ago. Could it be better? Yes, certainly. That is something that we would agree with. However, we appreciate that, as Teela mentioned, cases can go on for a very long time.

Q213 Simon Fell: Thank you. Perhaps I did not express the second part of my question that well. What I was trying to get at is this: if a law enforcement agency has concerns about a particular individual or a group of individuals, does it send that information to you directly for you to look through your site and identify them?

Neelam Patankar: Yes.

Q214 Simon Fell: In that case, or in a case where your moderation team or a user of your site identifies someone who they are concerned about and reports, what happens then? Do they stay on your platform? Do they get de-platformed?

Neelam Patankar: It would go to two areas. If they came directly through to us and not Unseen, through the button that I mentioned, the first thing that the team would do is contact the police immediately. They would find out the relevant force and speak to TOEX, now that we have TOEX to speak to, and understand how they want us to act. As I mentioned, although we would love to take the advert down, unfortunately they request us to keep it live, because they do not want to disrupt the criminals and alert them to the fact that they have been monitored.

Q215 Simon Fell: Thank you. What is your level of dialogue with your commercial rivals? I imagine that many people advertise across multiple platforms. I do not know what your rival site is, but if your main rival identifies someone that they are concerned about—or perhaps law



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enforcement has approached them—do they share that information with you, and vice versa?

Neelam Patankar: Unfortunately not. It is incredibly important that we do not have dialogue with any other operator. Part of the work with the Home Office and the National Crime Agency involved a code of conduct for how the industry should be lifted to a better standard. We therefore have many good practices in place. The only dialogue has been in those working groups, not one to one.

Q216 **Simon Fell:** Is that because of legal barriers to sharing, police policy—they do not want you talking to each other—or is it a commercial decision?

Neelam Patankar: No, not at all. It is incredibly important, but many of these operators are international operators that, unfortunately, do not want to communicate. That is the biggest challenge faced by a lot of people in this space, or who have an interest in this space. We are always open to collaboration—it is a key ethos of the way we operate. Unfortunately, we do not see that with other operators.

Q217 **Simon Fell:** Thank you. Professor Sanders, I know you have done research about these sites being used to disrupt and prevent. Can you give us a bit more detail on what you found and whether you identified any good practice?

Professor Sanders: For sure. Our partners are the NCA, the NPCC and we work with Unseen as well. I want to flag how difficult it is to research in this area. We work closely with the NCA, but even with them as gatekeepers to ASWs, we managed to engage only five out of around 260 that operate in this country. That demonstrates the real underground nature of the operation. Obviously, Vivastreet are here and are very much part of the good practice model that we have been looking at, and how to enhance—

Q218 **Simon Fell:** Sorry to interrupt. The five you have identified—

Professor Sanders: Five we interviewed.

Simon Fell: Sorry, the five you interviewed. Do you have any idea of what percentage of the market they hold?

Professor Sanders: The main one—the biggest ASW out there—has not engaged with us. I do not think they are engaging with much law enforcement at all. That is problematic. I imagine that the percentage is probably 40%, perhaps 50%.

The 260 or so that we have done scoping around fluctuate—they close, they open, they change. There is obviously a lot of surveillance at the moment, so it is very hard to track and see what is happening. We did reviews of about 17 to look at the types of things that they have that can assist people who are putting on adverts as independents, and to see whether there is customer service, reporting buttons through to Unseen, or information about red flags and exploitation. About half of the 17 we



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looked at have that, so there is emerging good practice on trying to raise standards.

The NCA has worked with a small group of voluntary, willing ASWs, including Vivastreet, to come up with some gold standard practice. What is coming out is the need for much more stringent verification of who is putting on the profiles. Verification is a big issue for the Online Safety Bill—Ben might be able to say more about that. For example, is the person who is putting in the advert the real person in the verification process? A lot more could be done there; it could be more mandatory. At the moment, in many ASWs, there is a one-time verification. That is probably not enough; verification needs to be much more frequent. Stringent verification is a key thing. That needs to happen more, as well as proactive AI moderation, and human moderation because of the nuanced nature of that.

There are ways that customers or sex buyers can be made more responsible, such as by not being anonymous and by making sure payment details are there. One of the really interesting things we heard from the police was the vast amount of financial data that ASWs hold—a bit like the banking sector, the finance sector, where, as we know, to check for money laundering they have various red flags and they have to report it. A similar type of process could be used for ASWs: if these things are flagged, there is a mandatory reporting process. Obviously, that will generate millions of reports every year, so what do you do with that? But we heard really great examples from the police, who would often do fraud investigations. We could see similar processes being applied to ASWs to really increase the level of responsibility, which would include not having anonymous customers or sex buyers. So that was some of the good practice there.

I think there are real concerns from the police that if there was an approach to try to ban ASWs, that would just push this underground. They would not be able to find victims and do these investigations. There is real concern that any approach in terms of regulation must have the safety of individuals at the fore. Some of those types of suggestion came through on recommendations.

Q219 Simon Fell: That is really helpful; thank you. I will ask just one more question if I may. You touched on fraud, and the Committee has heard repeatedly that capability in that space is really limited. It varies between forces; it's the luck of the draw as to whether you get a force that has the capacity to deal with it. What is your experience of law enforcement capability in this space? Does it differ around the country? Where is there good practice? And do you have any recommendations for what a dedicated police force could perhaps do?

Professor Sanders: That is a really great question. Everyone generally has a modern slavery unit and various amounts of law enforcement attached to modern slavery. Often, the police forces where there is a major transport hub, like an airport, or in a city centre tend to have much bigger and much more experience. We had really great examples from



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around the Gatwick area and the Manchester area. But then there are other, rural police forces that have not really addressed modern slavery in their area, because there is much less of it. There is a spectrum of good practice, or practice, across the country.

The main thing is that we have TOEX, which I think is a five-year-funded Home Office set of law enforcement measures across the nation, divided into various regions. TOEX is a really important way of having an overview of what is happening nationally, because often this is all about moving around the country. I think TOEX is the really good practice that is coming out of here.

Simon Fell: Thank you very much.

Q220 **Chair:** Could I just clarify one thing? You said that if adult services websites were abolished—not allowed, made illegal—that would be a problem because it would force everything underground and it would be very difficult for the police to investigate. I don't quite understand that, because if you are selling sex, you need men to find you, so how can it be more difficult if we get rid of these websites? They are going to have to find a way of—

Professor Sanders: The dark web—

Q221 **Chair:** But if punters can go on to the dark web, the police must be able to go on to the dark web.

Professor Sanders: They would, but it's a resource question. At the moment, they can see everything; it is visible and available. You don't need huge numbers of crime analysts to get into these spaces. We saw with SESTA-FOSTA legislation in the US in 2018 that when those websites were shut down, various other types of online technology basically just replaced them.

Q222 **Chair:** So it's a matter of the police and their resource. That is the issue that needs to be addressed.

Professor Sanders: That is the issue, but not for consensual sex workers, obviously, who are the majority of people who use—

Q223 **Chair:** Sorry—"who are the majority of people"?

Professor Sanders: Who use these websites, yes. I did a previous project, called Beyond the Gaze, in 2018 in the UK. We did a huge amount of work surveying sex workers, police and so on, about consensual sex work and the various practices. That has obviously gone up since covid, with many, many people moving online to sell sex.

Q224 **Chair:** I would be interested if you could provide some information about what you describe as consensual sex work and what your indication is of the numbers of trafficked people.

Carolyn Harris: Yes, how do you know?

Professor Sanders: I could give you some information here now.



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Chair: We have to move on, but if you could provide it, that would be helpful.

Q225 **Paula Barker:** Before coming to Dr Brewster, I want to ask Ms Patankar a question. How do your organisation and your safeguarding team verify the age of those selling sexual services?

Neelam Patankar: We have a third-party provider that we use. It is a specialist in that form of verification, obtaining that data and the encryption of that data. It is available. Again, it depends on some of the behaviours and on how rigorous we are with those checks. So it would be a case of a sex worker, or whoever is being verified, needing to upload their identification document, whether that is a passport, driving licence or national ID card, to the third-party provider we use. That would then be verified. The reason we used this third-party system is because they are the experts, and they ensure that the documents they receive are legitimate and cannot be falsified. So yes, we do have it, and we use a third-party tool.

Q226 **Paula Barker:** Surely passports and other forms of identification can be acquired fraudulently, so what particular system does your third-party provider use to ensure that it is not a fraudulent piece of documentation?

Neelam Patankar: That is exactly why we have used a third-party provider. I am not aware of the details of how they get to that place, but I can certainly try to follow it up and confirm with you. It is worth knowing that this third-party provider is also being leveraged by social media in some countries. It is used by Sainsbury's and by the Post Office, so it is quite a credible provider.

Q227 **Paula Barker:** Are you able to share the name?

Neelam Patankar: Yes, it is Yoti.

Q228 **Paula Barker:** Throughout the course of Vivastreet being in operation, have there been any referrals to the police for anyone who has fallen through the net and has been found to be a child? Is there anyone who failed the verification checks?

Neelam Patankar: Prior to verification checks, unfortunately, there was one incident, which sparked us to introduce age verification. There was one incident, but we now have verification in place to ensure that we have measures.

Q229 **Paula Barker:** And how old was that child in the first instance?

Neelam Patankar: I am not completely sure. They were underage.

Q230 **Paula Barker:** Thank you. Dr Brewster, in relation to the human trafficking of children, what needs to improve in how the police use technology in this area and in trafficking investigations as a whole?

Dr Brewster: I am not too sure about the police's use of technology, but the use of technology to detect potential issues is an issue across the board. You need collaboration between electronic service providers like



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those mentioned, the police and third sector who have expertise in things such as child sexual exploitation and abuse material. I think we need attention on broader forms of trafficking and exploitation involving children, not just on the dissemination of exploitative materials, which is the focus of policy and energy in this agenda at the moment.

Q231 Paula Barker: In respect of trafficking victims, we know that 75% of victims trafficked for sexual exploitation are advertised via adult services websites. Do you have any indication of how many of those are children?

Dr Brewster: I do not know. I don't have that evidence.

Professor Sanders: Where does that statistic come from? I have not heard that.

Q232 Paula Barker: The OSCE.

Professor Sanders: That does not correspond with what we have from Unseen, which is the modern slavery helpdesk. This is some of the information that I wanted to give. We did some historical analysis of their data from 2017 to 2021. They had just over 8,000 reports of modern slavery in that time; 1,236 were cases of sexual exploitation and only 130 were connected to adult service websites. So from the Unseen perspective, it is relatively low, but it is increasing. In the data for '21-22, they saw a 66% increase in this, among sexual exploitation. However, the main areas of increase were labour exploitation and, surprisingly, exploitation in the care sector, which was really surprising—reports to the helpline have gone up over 1,000%. From our perspective around shape and nature, it is very, very difficult to get numbers on extent. Obviously, with the impact of covid and most things moving online, there is an increase in reporting around how all technology is being used, but the extent is very difficult to know, so I am really going to look into that 75%.

Paula Barker: Thank you.

Q233 Marco Longhi: Ms Patankar, to what extent are you concerned that vulnerable people could come to harm because of the use of your website for sexual purposes?

Neelam Patankar: Incredibly. It is part of our mission: safe, trusted advertising free from stigma.

Q234 Marco Longhi: So you are very concerned.

Neelam Patankar: It informs all of our practices, to ensure that we do provide a safe space.

Q235 Marco Longhi: Right. If I could perhaps come back to you, could I ask the two academics—if I may address you in that way—to what extent you believe that either Vivastreet, if you have done that detailed analysis company by company, or companies such as Vivastreet online could be platforms that are enabling harm to vulnerable people?

Dr Brewster: I would be careful about using language like “enabling” and “facilitating”. Platforms have—



Q236 **Marco Longhi:** What other language would you use?

Dr Brewster: I think there is a lot more work that platforms could and should be doing. We have got to a point where the horse has bolted away from the cart a little bit: the technology has led, and issues around safeguarding, exploitation and harm have taken a back seat. Things like security, privacy and safety-by-design principles have not been integrated into these services, so that when we get to points where we have issues, features are already in place that would have been able to prevent and detect many of them. A lot of things are being retrofitted based on the fact that bad incidents have happened and we have gone back to rectify them.

I think we need to change the model of thinking around how, when new technologies are introduced—we see all the time that new technologies are coming through, such as virtual reality; dark web has been mentioned earlier today—we get out ahead of issues emerging before we go back to fix them. State regulation, rather than relying on the technology sector itself to self-regulate, has got to be the trajectory moving forward.

Q237 **Marco Longhi:** Self-regulation?

Dr Brewster: At the moment, the sector is essentially self-regulating on these issues, so a shift away from that is what I am suggesting.

Professor Sanders: I agree. We are at the point where ASWs are all self-regulated. Only a very, very small percentage of them come to the table to work with enforcement and with the gold standards that the Home Office and the NCA have tried to develop. It is only a small percentage, because there is no mandatory requirement yet, so I think the OSB does provide an opportunity to catch up in some ways—although with the code of practice that will be written, again, it is about “How is this going to be policed? How are websites going to be held accountable? Who is going to operationalise the huge amount of data that they might have to mandatory-report?” It is very much catch-up. On prevention, in terms of how we stop people being harmed, we really need to think more clearly about how digital technologies can help us.

Q238 **Marco Longhi:** Actually, I think that was my angle on this.

Ms Patankar, you acknowledge that you are incredibly concerned. If concern is that high, would it not be a logical conclusion that either more restrictions, or even stopping trading in this marketplace—as you might put it—would be the best option? It seems apparent to me and to the rest of the Committee that it is almost impossible that self-regulation or the types of scenarios that my colleague Mr Loughton explained could be robust enough to stop harm from happening.

Neelam Patankar: I have a few things on this, if I may. As I think both academics have mentioned, it should not rely on operators to self-regulate, because many do not—we do, but many operators do not—so I think some form of regulation, holding the standards that the Home Office, the NCA and the working group have developed, should come into force. I know that the Online Safety Bill carries a lot of the spirit in which we



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worked on the code of conduct. So, first and foremost, we cannot continue to rely on self-regulation; we need this space regulated.

In terms of not trading, if any law is passed, we will comply and we will follow—we are a responsible operator—but I think we need to be very mindful of unintended consequences. Yes, the aspect of genuine independent sex work and being online makes people safer. Like I said, it gives them choice—it allows them to choose who they are seeing and go through a vetting process of whoever is purchasing sex—and it unlocks many digital tools. But more importantly, there will be a continuation of operation through international players. If ceasing existing or operating as an adult service website seems to be the answer, yes, Vivastreet will comply, but unfortunately how do we deal with the problem of international operators that do not have to succumb to UK law? They will continue to operate.

Q239 Marco Longhi: Okay. I am coming to the end of my questions. I suppose that this is less important to me, but to what extent are you and the leadership team of your company concerned about the reputation of your company?

Neelam Patankar: I think any business would be. One of the things that we have accepted with operating within this space—again, it is very true to our mission of safe and trusted advertising free from stigma—is that the more we collaborate and communicate with law enforcement, the Home Office and so on, and the more we proactively report through TOEX, the more visible we are. Unfortunately, there are some things, such as the issue around exploitation today, that a business tends not to want to be very visible for, but we have accepted it. It is part of us living to our mission.

Q240 Marco Longhi: Unlike my colleague, and I mean no disrespect, I was not aware of your company before, so I typed it into Google here—I hope I am not going to get into trouble with the Parliamentary Digital Service. The first sponsored site is Vivastreet, because that is what I searched for, and immediately below it is justshags.co.uk. Now, I thought that I had understood your platform to be a marketplace for the trading of all sorts of things. Why do you think that that comes up immediately after your company?

Neelam Patankar: Because of the association with the adult space.

Q241 Marco Longhi: You are associated with all sorts of trade. Why would that one come up?

Neelam Patankar: We are indeed. There has been a particular focus in the adult space over recent years to develop so many of the measures. Like I said, it is very important if you are operating in this space that you understand the complexity, but you also understand the risk that is associated. As a business, we do understand that. It is why we have implemented so many processes and we talk with so many people, to ensure that as a business we are operating responsibly and can put in the measures that we are comfortable with.



Q242 **Marco Longhi:** Finally, could I ask something particularly to the academics here? I hope you don't mind my addressing you in that way. I am particularly concerned about the human trafficking element of this, because that is what the scope of this Committee is. To what extent do you believe that Vivastreet and other such companies are contributing to human trafficking, either within the UK or from outside the UK with people being brought into the UK? Do you have any data that might suggest how that might be playing out?

Professor Sanders: The data element is really difficult. I would not want to put a number on it, just because it is underground and it is hidden. It is probably a question for the NCA particularly and the NPCC.

Again, I think it is difficult to make blanket statements: I would not say that all car washes or all nail bars are hugely contributing to human trafficking, but we know that those are spaces where labour exploitation happens. In the same vein, some ASWs, particularly those that do not engage with law enforcement, are clearly letting their platforms be open and inviting to traffickers and criminals. That is not some of the key ones, but then there are lots and lots out there, and because there are no mandatory requirements, they are just left to the market. So yes, it is clearly some, because there are no other ways of regulating, but it is not all.

Dr Brewster: Just to add to that, I think the websites are seen from a trafficker's perspective as a way of increasing their anonymity, distancing themselves from the criminality that they are perpetrating. I think in some ways the ecosystem of the internet and the way we interact with it—to look for work, to buy and sell goods and services—creates this environment where those who are looking to do harm and profit from criminality can do that with an added level of anonymity, and with potentially a greater reach and scope for what they are doing in terms of profitability.

Q243 **Marco Longhi:** Would you agree—sorry, Chair; I did think of something else to ask—that the very existence of these companies and the ability to trade in such a way as they do today, with seemingly very little control, is actually contributing in some significant degree to human trafficking?

Professor Sanders: I don't think there is the evidence to say "significantly".

Dr Brewster: We just do not have the numbers. It is hard to put an adjective to it; I think we just do not have the numbers.

Marco Longhi: Okay.

Q244 **Chair:** But we do acknowledge that they are facilitating and enabling the trafficking, don't we?

Dr Brewster *indicated assent.*

Q245 **Lee Anderson:** Just a couple of questions from me. I think, Ms Patankar, you said that there was a turnover of £25 million.



Neelam Patankar: Last year it was £21 million.

Q246 **Lee Anderson:** How much is actually reinvested into safeguarding, and how many safeguarding workers have you got?

Neelam Patankar: There are different avenues of safeguarding, but it is within the DNA of the business. Everyone, in some way, shape or form, will have that as a priority. Our safeguarding team is a team of five. Our moderation team, like I said, is a team of 25, and we have customer service staff as well.

Q247 **Lee Anderson:** Just one more question, about these services that you offer online. I would imagine that most reputable companies, whether that be a supermarket or whatever, have some sort of mystery shopping—this is not going where you think it is going—where the staff, services and product will be checked out by an employee of the company. Have any of these workers actually had a visit on site—obviously not to provide the services they are offering, but so that somebody from your company can sit in a room with that young person to decide whether or not they are vulnerable, injured, a drug addict or, indeed, a child? Does that ever happen?

Neelam Patankar: Yes. Our safeguarding team, as I mentioned, has a combination of skillsets, but also—

Q248 **Lee Anderson:** Are they booking as a client when they do that?

Neelam Patankar: It is ex-law enforcement. They have been within this space, and they have seen some of the horrific things that can take place. I myself have been on site; I have been jointly with the NCA on a site visit to understand the other aspect and the other area of this exploitation that can take place.

Q249 **Lee Anderson:** Just to be clear, then, you have staff who will actively book an appointment to see a sex worker for services under the guise of a punter.

Neelam Patankar: No.

Q250 **Lee Anderson:** No?

Neelam Patankar: The direct answer to your question is no.

Lee Anderson: Why not?

Neelam Patankar: But have we experienced being on site? Yes. Have we mystery-shopped—

Q251 **Lee Anderson:** Would you say that it would be fair to actually mystery-shop these services properly, where the sex workers are unsuspecting and you can actually get into a room with them and have a proper conversation about their safeguarding? Wouldn't that be a better way to do it?

Neelam Patankar: I understand that you are looking through the lens of exploitation, but the reason we would not do it is that that would be a



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genuine sex worker believing that she was about to have a visit and expecting to take a booking for that day. If we then turn up and we are not a genuine customer, unfortunately it may put her in more harm, to take a riskier booking later on.

Q252 **Lee Anderson:** If you genuinely had the best interests of these people at heart, would you not just ignore what you have just said and actually go into these places on a random basis just to check that among the people subscribing to your website and paying you all this money, there are no children? Surely you would do that.

Neelam Patankar: I think it comes back to the point I was making about if we were to mystery-shop in this way. Have we visited a site? Yes: I have even visited a site, and I have people within my team who have. That is the way we have chosen to do it, because we do not believe in mystery shopping in the way you are suggesting. When you understand the independent sex worker's perspective, taking a booking that is not actually a booking is not beneficial to a customer.

Q253 **Lee Anderson:** Has anybody ever tried mystery shopping? Has anybody ever tried it in this industry?

Neelam Patankar: No. Like I said, we don't.

Q254 **Lee Anderson:** So how do you know that it doesn't work, then?

Professor Sanders: If I may come in, law enforcement does do this. They do it in relation to welfare checks, particularly if ASWs would give red flags.

Q255 **Lee Anderson:** So it does work.

Professor Sanders: It does work in terms of checking that this person is legitimate, okay, needing help or not. Welfare checks do happen as part of—

Q256 **Lee Anderson:** If it can work in law enforcement, why can't it work with your company doing it?

Professor Sanders: I think it works because ASWs give the information to law enforcement saying, "There may be a red flag here. Can you check this?", and then law enforcement will do the checks.

Neelam Patankar: Also, as I mentioned, I have been on site. That was through a mystery shopping visit through law enforcement. It is not something that we would do ourselves.

Lee Anderson: Okay.

Q257 **Chair:** Can I just be clear, because I think there has been some misleading of the Committee? On the age verification point and the questions that you answered: it is optional, isn't it? It is not mandatory on your site.

Neelam Patankar: It is not mandatory, no. It is something that we have on our platform, but it is not mandatory.



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Q258 **Chair:** So it is optional. Can you just confirm, because I do not think that you answered my question, whether one person can place multiple adverts?

Neelam Patankar: Yes, they can. We do have a threshold in place.

Q259 **Chair:** What is the threshold?

Neelam Patankar: An advertiser can post up to four. From our own research and our own understanding, we see that genuine independents still have more than one advert, because they market themselves in different ways.

Q260 **Chair:** You keep talking about genuine independents. What I am interested in is women who are trafficked. You are saying that a person can advertise up to four women who may have been trafficked.

Neelam Patankar: Somebody can place four adverts under one account, but they will be triggered within our safety team. If more than one advert is created, that will create an internal process.

Q261 **Chair:** Okay. And how much are you paid?

Neelam Patankar: I am not going to disclose that.

Q262 **Chair:** Oh, okay. You don't want to tell us.

Neelam Patankar: I do not want to disclose that.

Chair: Okay. I am just asking.

Q263 **Simon Fell:** Professor Sanders, I know you have been engaging with Vivastreet, which is one of a few in this area that have been sharing with you. What does bad look like?

Professor Sanders: Bad looks like people who do not come to the table. People who do not engage with the NCA working group. People who do not share information with the police. People who do not respond to police requests for data. People who do not have customer services for profiles. Websites that do not say, "Exploitation is bad. This is what it looks like," or do any education work with the sex buyers. That is what bad looks like.

Q264 **Simon Fell:** Are there any moves to get those shut down and use police enforcement powers on them?

Professor Sanders: No. There are no mechanisms to do that.

Q265 **Simon Fell:** They just continue to operate with impunity.

Professor Sanders *indicated assent.*

Simon Fell: Right. Thank you.

Q266 **Carolyn Harris:** Ms Patankar, when my colleague asked you about the mystery shopper, you said that if a person made an appointment and went to see someone, and they were expecting a client, but it wasn't a client, that would put them at more risk. Risk from what?



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Neelam Patankar: It is a time-wasted visit.

Q267 **Carolyn Harris:** But you said they would be at more risk.

Neelam Patankar: Yes, which I am coming on to. If I was a sex worker who was expecting somebody, and that did not turn out to be a visit, I could then potentially take a riskier booking because I would need to make the visit that I had just missed. I might not do my vetting checks properly. I could take a riskier booking.

Q268 **Carolyn Harris:** Surely, as a mystery shopper, you could compensate that person financially to stop them losing the money. If the money was the issue—

Neelam Patankar: You are completely correct. Yes, we could. Like I said, I have been on a visit myself, and so have some of the—

Q269 **Carolyn Harris:** I want to know what the risk is, other than that you say that they could take a riskier client.

Professor Sanders: Well, they could decide that—

Carolyn Harris: Thank you very much, but I asked the lady for the answer.

Neelam Patankar: I think it is very important that it comes from a research perspective. Like I said, our take on that is that they could put themselves in a more vulnerable situation. It is why we have partners such as ClientEye, which is an app created by sex workers for sex workers, to ensure that they are not taking riskier bookings and that they are able to vet—

Q270 **Carolyn Harris:** So they are not at risk from their traffickers, then. You are not suggesting that if the punter turned out not to be a genuine punter but to be someone from your company, that would put the individual at risk from their pimp or their trafficker.

Neelam Patankar: That is an area that is risky, of course. I think that I have acknowledged that that risk is held. It is why we have so many of the measures that we do. As I said, safe, trusted advertising free from stigma is how we operate.

Q271 **Carolyn Harris:** Does that not make it even more sensible to do what my colleague suggested, then?

Neelam Patankar: Mystery shopping our sex workers? We could. Like I said, I have been on a visit myself. It is something that we have not chosen to put into practice as of yet.

Q272 **Tim Loughton:** You keep saying that you have been on a visit yourself. What do you actually mean?

Neelam Patankar: The mystery shopping visit that you are referencing was when I had a visit with some of the working group who work in the Home Office and the National Crime Agency. Part of that learning and education was understanding some of the risks that can happen, what



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these rooms, and these potentially trafficked victims, look like, and what could occur. They had mystery-shopped off Vivastreet. I joined them on a site visit to understand what the set-up is and what environment they are in, to further our understanding.

Q273 **Tim Loughton:** So the NCA do mystery visits?

Neelam Patankar: It was a gentleman who represented Bedfordshire police.

Q274 **Tim Loughton:** So they book the services of a woman, turn up and say, "We're not actually going to go through with it; we're just doing a mystery shop." Presumably they pay the fee.

Neelam Patankar: I cannot comment on that. The operation that I was involved—

Q275 **Tim Loughton:** If I am a mystery shopper for a restaurant magazine, doing a review, I will go to a restaurant as a mystery diner, I will pay the bill, and then I will do a write-up completely dispassionately of whether it is a good restaurant or not. Your safeguarding staff could do exactly that. They could turn up and, rather than go through with the services, say, "Thank you very much. Here's the money, but we're not actually going to take those services." That would be a proper mystery shop. What is the problem with that? That is not any detriment to your advertisers. It is you having to invest a bit of money to do some sample safeguarding of whether the people you are allowing to advertise are genuinely advertising within the law, without being subject to trafficking.

Neelam Patankar: Understood. As I said, it is not something that we have in place.

Q276 **Tim Loughton:** Why not? Would you consider that now?

Neelam Patankar: I can certainly consider it, and go away and speak to our teams and get their views. Like I said, we do want to operate as safely, and be as trusted, as possible. There is emphasis on the trust element here. There is the trust of the people who are advertising, but I can speak to my team internally and see how we view things.

Q277 **Tim Loughton:** Surely your advertisers would be reassured that you are taking their safety seriously. It is actually reassuring, and a bonus for your advertisers, as well as to make sure that you are not hosting what are effectively trafficking sites.

Neelam Patankar: Like I said, it is something that I will review and consider.

Q278 **Lee Anderson:** Just on that point, surely for the punters who use your service, that will give them more confidence that they are not getting services from people who are being trafficked, being abused, vulnerable or under age. I just do not understand why you don't do it.



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Neelam Patankar: Certainly. Like I said, I can take it into consideration. I also have to think of my staff and their safety, but it is something that I can take into consideration.

Chair: I think the bell is about to go and we are about to vote. Thank you for coming before us this afternoon. Could you write to us with the information that we have requested, and could you please confirm exactly what the issue is around men placing an advertisement? That is clearly not what your modern slavery statement says—what you have told us is incorrect—but thank you for your time. I ask Members to come back as quickly as possible, and we will move to our second panel.

Examination of witness

Witness: Rhoda Grant MSP

Q279 **Chair:** Welcome back. This is the second panel of our inquiry hearing this afternoon. I invite our witness to introduce herself to the Committee.

Rhoda Grant: I am Rhoda Grant and I am a Member of the Scottish Parliament. I co-chair, along with Ruth Maguire, the cross-party group on commercial sexual exploitation. I also chair the cross-party group on human trafficking, so I have an interest in that, but the report I have been invited to speak to comes from the cross-party group on commercial sexual exploitation.

Q280 **Chair:** It is very helpful that you have both those hats. Thank you for coming along today. When you conducted your inquiry in the Scottish Parliament into pimping websites, were you shocked at what you found?

Rhoda Grant: Yes. We conducted the inquiry because we were concerned that this was a growing problem and a growing issue. We were shocked by what we found, because it was so easy for trafficked people to be advertised and used on those websites. That made it incredibly easy and, to my mind, facilitated trafficking, in that you could change where somebody is being advertised. Some have an “on tour” function, and some have a “visiting an area” function.

Q281 **Chair:** Could you say a bit more about the “on tour” and the “visiting”?

Rhoda Grant: It allows someone who had an advert to change where they are located, which is one of the real pillars of trafficking within the UK. It means that you are moving people around so they can't become known to services. It is much less likely that they get to meet support groups if the police become aware of them, so you move them around. You can move them by renting holiday accommodation. Those people are always on the move and are not able to establish themselves with any support services at all. That allows that to be under the radar all the time.

Q282 **Chair:** Were there any other issues that you identified and were shocked by?

Rhoda Grant: From speaking to survivors, it was quite clear that they didn't have to advertise; the adverts were drawn up for them. They didn't



know what they were advertising. One woman who was speaking to us through a support group said that she didn't even understand what her advert said, so other people were doing the deal, and she was confronted by a punter when she had no idea what they wanted and had signed up for. Others didn't even know they were being advertised. Megan King said she assumed it was her pimp's girlfriend who had placed the advert and had gone through the passport check and the like. There is no way of knowing, when the person places the ad and shows their ID, whether that is the ID of the person providing the service. The way the whole system could be used to promote trafficking was really shocking. Nobody would be aware that that was happening.

Q283 Chair: I do not know whether you were able to hear some of the previous session, but one of the issues that I am interested in your thoughts on was the approach in England and Wales, where the Home Office and the National Crime Agency seem to be working alongside these pimping websites. When I questioned Vivastreet about the number of advertisements in my city of Hull, and why a number of them had the same telephone number and the same text, which looked like it had been copied and pasted, I got the answer, "Well, those might be under investigation by Humberside police, and that is why they haven't been taken down." What do you think about that idea of law enforcement working alongside these pimping websites?

Rhoda Grant: We were concerned that the National Crime Agency especially, to be honest, was working with Vivastreet and that it seemed to be accepting everything it said and did not seem to realise the nature of this. We were speaking to support groups and organisations, such as TARA and the Women's Support Project—organisations set up to support women who are being exploited and trafficked. They could easily pick up for us—*[Interruption.]*

Chair: Sorry, I was told there would be only one vote. Just bear with us one moment. We can carry on now.

Rhoda Grant: We were quite concerned that it seemed to have difficulty finding suspicious adverts when these NGOs were able to pick them up really easily and show us how they would identify them as possible trafficking. In our report, one of our recommendations was training for law enforcement to make them aware of what they are looking for. That cosy relationship between the National Crime Agency and those pimping websites also really concerned us. We did not get the same from Police Scotland. It was very clear that those websites were used by organised crime and for trafficking, but it was also very clear that the number of adverts was almost impossible to deal with. There was a huge amount of exploitation. If this is facilitating trafficking because it is making it easy, and it is hidden from the authorities, we really need to deal with whether we should have those websites at all, and whether there should be advertising.

I suppose that then brings me to the online harms Bill. Advertising falls between two stools under the devolved settlement. We are responsible for



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crime and the legislation, but advertising is reserved. We would be very keen, if you were looking to report, on looking at a legislative consent motion or something like that to outlaw some of those sites, and certainly those adverts on those sites, because that is the way you get around it. If the sites, and everything that advertises this, are not allowed, you actually safeguard people.

Chair: Alison Thewliss, would you like to ask any questions? I know you might have to go to another meeting.

Q284 **Alison Thewliss:** I would. It would be interesting to hear other, particularly Scottish, aspects of the way in which this is handled. You mentioned Police Scotland's approach to the websites, and how people get moved around the country. Would it be fair to say that moving around the country happens everywhere, or are there particular aspects to it? Are people trying to evade detection by doing that?

Rhoda Grant: I think it happens everywhere because it is a form of trafficking. When you talk about trafficking, people always assume you have taken someone from abroad and kidnapped them, and you are taking them here. Of course, that happens and there are horrendous stories, but you also have people trafficked within the UK for exactly the same reason. Vulnerable people are taken and trafficked around, and have no control over how they are being advertised. It is the same thing: the more you move them around, the less able they are to get in touch with services.

Q285 **Alison Thewliss:** In earlier evidence about the differences between people who have been trafficked from abroad and people who are trafficked within the UK, we picked up on some difficulties in the latter's understanding of trafficking. Do they feel as if they are being trafficked? Do they understand measures such as the national referral mechanism, and how that applies to them? Does more need to be done for people in the UK who are being trafficked around, to help foster understanding, so that they feel part of that process?

Rhoda Grant: Yes. We need to do an awful lot more awareness raising, because people don't understand that trafficking goes on under our noses, day in, day out. That is one aspect of trafficking, and people need to be able to recognise it. Also, people need to understand that the people being trafficked don't always see themselves as trafficked. They have got into situations that have left them vulnerable, so it is a bit like someone being scammed. People don't like to say that they have been scammed because they feel silly and that they have got themselves into a bit of a mess; they are embarrassed about it. With all those things, you are supposed to protect yourself.

Quite often, people who are trafficked are vulnerable. They are looking for money, a better life and all those things, so they get themselves into situations, and then they are afraid to reach out and ask for help. They are more afraid if they don't make any connections with other people. Keeping them on the move is a good way of stopping them reaching out and accessing services.



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It takes time to win the confidence of people, especially people coming from other countries, who may not have the same relationship with law enforcement as we do. There are lots of barriers to people reaching out and seeking help. They may be illegal immigrants and may feel that they will be deported, or that their families at home will be told—there are lots of reasons why people who have been trafficked aren't always the first to reach out and ask for help.

Q286 Alison Thewliss: We heard from Rights Lab that the experience in Scotland and Northern Ireland is slightly better than the experience in England and Wales for people who have been trafficked, because support services like TARA are able to work with people for a bit longer. Do you think it would be advantageous to have that more widely, so that it isn't a case of having a set time of, say, six weeks before you are out the door? What do you think about the changes that the Government are looking to introduce in the Illegal Migration Bill, which would prevent people accessing those services because they wouldn't be considered part of the system? Would that have an impact?

Rhoda Grant: It is crucial that people have access to services for as long as they need. If you identify someone early on, and you are able to intervene quickly, then the damage they will face will be less than for someone who has been trafficked for a long time, who may have practically lost their sense of identity, having been not free for that length of time. I think services have to be available for as long as someone needs them.

One of the other issues with prosecuting cases is that people want to get away; they have had a really bad experience. The police tell us that people want to go home. If they have been trafficked from abroad, they will probably leave the country and go home, and then you don't have the witness or the conviction. It is important to try to keep people who have been trafficked—obviously, not against their will, given what has happened to them, but to give them confidence to remain, so that they can be witnesses. Often, that is very dangerous for them, because we are talking about organised crime, so we need to be able to give them security and safety.

Q287 Carolyn Harris: Nice to meet you. In your opinion, are these pimping sites facilitating sex trafficking?

Rhoda Grant: Yes.

Q288 Carolyn Harris: To what extent?

Rhoda Grant: To a huge extent. This is the safest way for pimps to advertise people who are trafficked and the safest way for punters to buy sex, because they don't have to go to a red-light district or be seen by anybody, and they can do this quite privately. These sites facilitate that. The sites build the demand by making it easy and private for punters to reach out. Once they are in place, you need to feed that market—that is how the money is made—so organised crime gets involved.



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There is money to be made by those sites; they are making huge amounts of money. Perhaps this is another matter, but they are pimping websites, so the people running them are pimps. All this money is being made. If you want to make money, why not traffic some people to feed that demand? I remember someone making the statement a long time ago that you sell drugs once, but you can sell a person over and over again. If the risk is the same, why not sell a person—if that is what you are going to do?

Q289 Carolyn Harris: I think the word that we heard the most in the last session was “safeguarding”. Do you believe that these pimping sites have adequate safeguarding measures to protect the people they are advertising for sale?

Rhoda Grant: No, and I do not think that they even try. A trafficker was convicted, but before he was, Vivastreet had given him an account manager who was supposed to report him on to the police because of his spending. Those sites are about making money; otherwise, they would not be advertising any of this, and they are very obviously making money from trafficking.

Q290 Carolyn Harris: In Israel, France and America, these sites are illegal. Should they be illegal in this country?

Rhoda Grant: Absolutely, they should be illegal. That is the way to stop trafficking to that extent. This enables trafficking. If you made these sites illegal, there would be a lot less trafficking, certainly for sexual exploitation. It would not stop it, but it would be much, much less.

Q291 Carolyn Harris: What about the academic argument that, if these sites were illegal, people would turn to the dark web? As someone who has done a lot of work on problem gambling, I have heard those words so many times—black market, dark web. Do you think that that would have an impact, or are those just words to make people feel better about not doing more about these sites?

Rhoda Grant: If you are selling something, you have to be visible. You cannot sell if nobody can find you. If you cannot sell, the traffickers have nothing to sell, so they do not need to traffic. You might get a site on the dark web, but tell me how to use the dark web. Ask all the punters if they can use the dark web. No, they cannot. The dark web is good for exchanging information with people whom you are associated with, but it is not a shop window by its very nature.

Q292 Tim Loughton: I do not know whether you were sitting in on the earlier session, but I think it is fair to say that all the safeguarding verification checks that we were assured kept people out of Vivastreet were not terribly convincing. Is anybody in this space capable of, or actually doing, serious safeguarding checks, so that there is a sanitised, safe space for people who are involved in this trade, and they can do it in a safer way? Not that that is a desirable thing, but it is less harmful than people being the victims of trafficking.



Rhoda Grant: I do not believe it is possible. We had evidence from somebody who was advertised on a site. Her pimp's partner had gone through the verification process—it was the pimp's partner's passport; she had filled in the form. Nobody knows who is actually being sold. The person being verified often is not the person being sold. There are other things that can raise suspicions. For instance, there are shared phone numbers, shared email addresses and the like. It could be your credit card or whatever. All those things are easily got around. You could buy pay-as-you-go mobile phones. It costs nothing to get a sim card and change it. You can set up Gmail accounts very easily, and you can use—we are all aware of them—top-up cards that act like Visa cards. You can use those to buy your adverts. I do not know of any way that you can be sure that the person who is advertising on your site is the person who is being sold.

Q293 **Tim Loughton:** That is very much the impression that we got. I was able to get round the system by playing the part of somebody else. It was slightly surprising when the head of the organisation basically said that she would go away and consider doing some secret shopping. That is one way of doing a face-to-face with the person. That is a no-brainer as far as I am concerned.

The point I am trying to make is: are there legitimate sellers of sexual services—whatever we may think about that—who could combine to have their own site where they can say, "If you want to buy sexual services safely from people providing them of their own free will and not controlled by traffickers, this is the site to come to"? Does it exist? Do you think that could ever exist?

Rhoda Grant: It does not exist to my knowledge, but I do not think it could ever exist, if I am being very honest, because this is hugely lucrative. You have heard of the profits that Vivastreet are making, and the managers and pimps are making equal amounts of money, so even if you set up a site that we have somehow scrutinised and we are very clear that those people are not being coerced in any way and are doing this out of their free will—that is another argument—you have no way of knowing that people joining the site are the same and are not being coerced. They would just find another way into those sites.

This is organised crime. There are maybe some small-time traffickers, but most of this is really organised crime, and they will find a way around it because it is really lucrative. They are making a lot of money out of this, so they will use everything in their power to stop that from happening.

Q294 **Tim Loughton:** What is the overseas experience? Are there any jurisdictions who do clamp down on this much more effectively than we do, or run it more legitimately—or less illegitimately, or whatever? Are we way out there as outliers or is this happening all over the place?

Rhoda Grant: It is happening everywhere that the law does not stop it, frankly. In France, for instance, the law stops it, so it is not going to happen. Now, it may happen, but it is closed down very, very quickly if it does.



Q295 **Tim Loughton:** How is it stopped in France? Just remind us—

Rhoda Grant: It is against the law; it is illegal. The sites themselves are counted as pimps selling sex and they are closed down. They have a system where it is illegal, but they also use a part of the law that is maybe closer to our civil law, so they can do it really quickly. They do not have to wait for a trial, with the months and years that that can take. They can do it very quickly—within weeks.

Q296 **Tim Loughton:** So the bosses of Vivastreet would be subject to criminal prosecution if they were caught doing in France what they are doing over here. What is your perception of what happens, then, to people offering sexual services in France? Where does it migrate to? Obviously, prostitution happens in France.

Rhoda Grant: It does, but France have adopted the equality model on prostitution, so selling sex is not illegal but buying sex is illegal. Sweden, Norway, France and lots of other countries have taken this on board. Indeed, the UN protocol says that every country should be acting in this way. It says that using trafficked people should be illegal in every country. I have spoken and listened at UN conferences on this where there are countries that make it illegal to buy the services of a trafficked person. What is very clear is that that is almost impossible to police. I think there was one successful conviction where the punter buying sex had put on PunterNet—a review website—that he knew the person was trafficked, and they were able to attach him to that person and demonstrate that he knew. But most will say, “We don’t know.”

So actually the way to stop it is to make purchasing sex illegal and ban those websites. You are making it legal to sell sex, so people who want to do that can go and do that, but people can no longer be exploited to do that.

Q297 **Lee Anderson:** I sort of wish that you had been here as the first witness today and that things had been the other way round—I would have probably come in with a few more questions. I want to talk to you about what Tim said, because something I raised in the first session was mystery shopping. I suspect that these organisations would not want to do that, because if a person was put into a situation with one of these sex workers, posed as a punter and then, once they got in there, asked some soul-searching questions and looked at the appearance of the workers to see whether they were underage and whether they had obvious signs of drug problems, were not quite with it, had mental health problems or whatever—I suspect that that would be one way to investigate these companies properly and do some proper safeguarding, but they seem reluctant to do that. They said it would not work. Then we discovered that, actually, the police do that on some occasions, and at that point the organisations suggested that they may try it in the future. But in your expert opinion, would you say that if we did some proper safeguarding like this, it would massively affect their profits?

Rhoda Grant: I think it would be difficult to do that safeguarding in the way you suggest, because the people involved would be afraid. It takes a



lot to coerce somebody into having sex with a stranger that they don't want to have sex with, so it takes much longer. When I speak to NGOs who work with people, they say it can take weeks and months to win trust and make those people feel safe enough to disclose what has happened to them. A lot of them feel that they have somehow brought this on themselves and made some bad choices, so it really takes more than a visit. If the police turned up—bearing in mind that when you are trafficking from abroad, the relationship with the police is quite different from here—they might close down and defend their traffickers. It takes a lot to win them over and say, "Actually, you're not the person in the wrong. It's this person that's in the wrong."

Q298 **Lee Anderson:** I was thinking more of a mystery shopper posing as a punter and getting into a room or wherever they go, and then it is quite obvious that this lady is underage. The punter has given her the money, saying, "No, I don't want to do it," and then goes back and reports her as an underage sex worker.

Rhoda Grant: You could do that, and that would identify people that were underage. But the difficulty is that for everyone you found and rescued, there would be tens or hundreds of others out there. You could not do it with every single person. I know in Scotland the police have tried to do welfare checks with people who are in prostitution, to check that they are well and that they are not being coerced—all of those things. It is incredibly difficult, and it is more difficult to do it with trafficked people, because their pimps and managers move them around. There are people trafficked within the UK so that they do not become known to the authorities and they do not become known to services. Actually, those websites facilitate that because they have "on tour", so they can advertise their services in loads of different places. You can probably Google anywhere in the UK that you are looking for sexual services and you will find somebody—not that somebody is always there, but they will traffic someone to you.

Q299 **Lee Anderson:** Do you think, then—you touched on it earlier—that it would make life safer for these people who are being trafficked if we just banned these websites?

Rhoda Grant: It is the only way to make this illegal so anybody advertising sex on those websites, that is an offence.

Lee Anderson: Thank you.

Q300 **Marco Longhi:** Were you in the room when others were giving their evidence?

Rhoda Grant: I was for part of it. I was sitting at the back.

Q301 **Marco Longhi:** In which case, I will just slightly introduce my question. I don't know how the rest of the Committee felt, but I was slightly surprised by the responses given by the two academics in what appeared to me to be—I need to be careful here in the words I choose to use, but I just got a sense that they seemed to be almost supportive of Vivastreet's



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position and therefore, by default, of other platforms that operate in that area. I use the word “supportive” in a very loose way. However, I was just surprised by the responses that I was getting. The lady here, who would have been to your left—I forget her name, but she was from a university—

Chair: Professor Sanders.

Marco Longhi: She seemed to be very against banning these websites because she said that it would just drive them on to the dark web. I would be surprised if the dark web was not doing this already. An enormous amount of policing is done of the dark web anyway, and I am not sure that it would particularly make it that much worse. Would you share that view? That is the first part of my question.

The second point that I felt was slightly odd was that, for academic institutions that carry out a lot of research, they did not seem to have a grip on much evidence at all. A university’s whole ethos is based around research, data and some basic questions around evidence.

One of my questions was, “Would you see the platform, Vivastreet, as an enabler of human trafficking?” They prevaricated; they did not really give an answer. I asked a more detailed question around whether the trafficking is within the UK or from outside the UK. “Oh, well, we just don’t know; we don’t have data.” How would you respond to that?

I do not know whether that question was asked by some of my colleagues before I arrived back from voting, but I think you state that “a major enabler of...trafficking” for sexual exploitation in Scotland was advertising websites. Therefore, you have come to a conclusion, which I presume is based on evidence, and it just strikes me—why would those two academics from two different universities not have that information as well?

Rhoda Grant: I cannot answer for them and where they get their information, but it seems very clear to me, as it is to you, that this is harmful. To answer your question about the dark web, you do not see Marks & Spencer advertising on the dark web, because nobody looks there. If you are selling something, you need to sell it where people can see it. The moment that they go on the dark web, they are not going to get purchasers. They are going to get very few people finding them on the dark web. That in a way solves the problem because, if people are not buying, people do not have to be trafficked to sell. Therefore the dark web is not an option.

How do they not see it? I do not know how they do not see it. The reason that we carried out our inquiry was because we were becoming more and more aware that much more was going online, and that it was unsafe, totally unregulated and nobody was really looking at it. The web provides a safe space, but for punters. You do not have to go down to a red-light district; you do not have to put yourself out there. You can buy sex from your phone. Nobody needs to know about it. There is privacy. It works



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well for punters, and that of course is the demand. The demand has to be fed and that is what causes trafficking.

Marco Longhi: Okay. If I may, Chair?

Chair: Just one more.

Q302 **Marco Longhi:** The other part of my question was about the evidence of trafficking in your own research concluding to the point that you made and that I quoted. What evidence did you come across that this was enabling trafficking, and to what extent? Did you see that just from within the UK, just within Scotland in particular, or did you see evidence of also people being trafficked from outside of the gate of the UK?

Rhoda Grant: We focused on the people being sold in Scotland, because that was what we were looking at, but it was obvious that people were being trafficked into the UK for that, as well as people in Scotland being trafficked.

Q303 **Marco Longhi:** To what extent, though?

Rhoda Grant: We sat down with someone from an NGO and went through websites, and very quickly she showed us what to look for, and there were loads—hundreds.

Q304 **Marco Longhi:** If you had to second guess, proportionately?

Rhoda Grant: I would probably rather not, but I would say a huge amount—not in the minority.

Q305 **Marco Longhi:** 50%? More? Less?

Rhoda Grant: Possibly more.

Marco Longhi: Possibly more. So you are saying that possibly more than 50% of punters are trafficked from outside the UK to the UK, yet a doctor and a professor, I think, were not even able to give an opinion on it.

Chair: They gave their evidence, and I think we are wanting to hear—

Marco Longhi: I am just astounded, when we are asking people to come here to give evidence. I just don't know who chooses these people.

Chair: We found a couple of people who provide a balance of different views and research backgrounds.

Marco Longhi: I am trying to help.

Chair: I understand that. I am very conscious of the time, though, because I know Ms Grant has to get back to Scotland, and I do not want her to miss her train. I think we have concluded all our questions. I thank you very much for coming along and giving your evidence. It has been really helpful for the Committee to hear about what your inquiry in Scotland found and your recommendations. Thank you for that.



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Rhoda Grant: It was my pleasure. If there are any other questions, please get in touch. I know that Ruth Maguire would be happy to answer questions in writing as well, if Members have any more.

Chair: Thank you.