

Behind the Profile

Sexual Exploitation and Trafficking
through Adult Services Websites

February 2026



Independent
Anti-Slavery
Commissioner

Foreword by Eleanor Lyons, the Independent Anti-Slavery Commissioner



"...how do you go behind a webcam to make sure that the woman isn't being coerced?"

These are the words of one of the survivors who bravely contributed to this report. They capture, with painful clarity, the central challenge confronting policymakers, regulators, and law enforcement in the digital age: exploitation has evolved and is happening online behind screens, profiles, and advertisements. It is now easier for perpetrators to reach victims and cause incredible harm.

Increasing numbers of women and girls are being identified as victims of sexual exploitation. In recent years, we are seeing more UK national victims of sexual exploitation and at a younger age. This is unacceptable and must change. We must proactively be looking at why this rise is occurring and doing everything within our power to stop it and protect the victims.

During my time as Independent Anti-Slavery Commissioner, I have spoken with victims of exploitation. Although their stories are individual, their testimonies point to a deeply troubling trend: whilst the online world has provided enhanced protections for some, for many women it has been central to how their exploitation was facilitated.

That is why I have listened to survivors of sexual exploitation and have carried out this research into Adult Service Websites (ASWs). These sites are easy to access and to browse explicit images of predominantly women for sale, accompanied by lists of the sexual services available.

The era of adverts in phone boxes is behind us and has been replaced by a vast digital ecosystem that operates in public sight and offers what appears to be largely unregulated access to sexual services. For this research I spoke to survivors, collected data from these sites to analyse the adverts for signs of exploitation and conducted legal analysis to understand how these sites were not being scrutinised.

The scale of the marketplace should give us pause. The 12 ASWs I collected data from had nearly 63,000 listings recorded in a single point in time and attracted 41.7 million visits in one month. 59% of the adverts on the sites had three or more indicators of exploitation and trafficking, and 39% had four or more indicators. Indicators of exploitation include the same number appearing across multiple ads, references to drug use, being 'new to the area', offering a broad range of sexual services and low-price points. UK nationals were the largest cohort on the sites and the average age was 25.3 years old. There were adverts in every corner of the UK.

Behind these numbers are real harms endured by survivors who were exploited on these sites. Survivors spoke to us about how they were groomed, controlled, and advertised online without their knowledge or consent. Traffickers and abusive partners created profiles, arranged bookings, and collected profits while the women themselves were left controlled and intimidated.

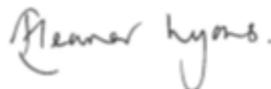
Survivors said subscription platforms acted as a gateway to normalising the sale of sexual access and lowering barriers that led to offline exploitation. They were encouraged to join these sites at school and university, offered discount codes for signing up, and told it would lead to a life of glamour and financial independence. A survivor described the ‘gentrification’ of sexual exploitation and how the internet is allowing perpetrators to reach across every cohort of society.

The level of harm on ASWs is exacerbated by a lack of safety features, protective measures and reporting systems to report sexual exploitation. There was weak verification, anonymous buyer access, menu-based service listings, third party profile control. The harms associated with ASWs are often structurally embedded within platform design, shifting risk onto those advertised while shielding those who profit.

These features do not simply fail to prevent harm; they can perpetuate it. When victims sought help in the offline world the response did not always reflect the complexity of trauma they have experienced. We must ensure that the expansion of trauma informed, survivor centred support is a priority.

This report is published at a moment of significant change, as dedicated national funding for the Modern Slavery and Organised Immigration Crime Unit (MSOICU) is set to end in March 2026, creating new risks for the UK’s ability to respond to modern slavery.

Government must act if it is to deliver on its promise to better protect women and girls. Legislation and regulation must keep pace with risk and harm identified in this report. Exploitation now operates behind screens as well as on the streets. If we are to confront this reality, our regulatory frameworks, enforcement tools, and support systems must all evolve together accordingly.



Eleanor Lyons
Independent Anti-Slavery Commissioner

About the Independent Anti-Slavery Commissioner

Eleanor Lyons is the UK's Independent Anti-Slavery Commissioner (IASC). The role of the IASC, its functions and powers were established in the landmark Modern Slavery Act 2015. This charges the Commissioner with encouraging good practice sharing amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK.

The role is independent of government, allowing the IASC to scrutinise and report on the effectiveness of policies and actions taken to prevent exploitation, support and protect victims, and bring perpetrators to justice. The IASC also supports the carrying out of research to improve our understanding of modern slavery and how it can best be tackled.

Acknowledgements

The IASC would like to sincerely thank the survivors who bravely spoke to us about their experiences for this report. Their testimonies have been vital to understanding the realities of exploitation, the harms embedded within systems and practices, and the urgent changes needed to protect others from similar abuse.

The Commissioner would also to thank the team at the global law firm Freshfields for assistance with the legal research in connection with this report.

Content warning

This report contains content related to sexual exploitation, including references to violence, rape, physical and emotional abuse. Some readers may find this material distressing. Please take care while reading and consider whether you feel safe and supported before proceeding.

A list of support resources for anyone affected by the issues discussed can be found at: <https://www.humantraffickingfoundation.org/support-services>

If you are concerned that you or someone you know is being exploited, confidential advice and support is available at:

Unseen UK Modern Slavery & Exploitation Helpline

 08000 121 700

 <https://www.modernslaveryhelpline.org>

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Executive summary

This research examines the role of Adult Services Websites (ASWs) in facilitating sexual exploitation and trafficking in the UK. Drawing on survivor testimony, large-scale platform data analysis and legal review. The findings indicate that ASWs form a significant part of the digital infrastructure through which exploitation is enabled, scaled and concealed.

The research combined three approaches:

- Survivor testimony: Trauma-informed interviews with 12 women with lived experience of exploitation linked to ASWs, analysed using inductive thematic analysis.
- Platform data analysis: 62,900 adverts collected from 12 ASWs (4–18 January 2026), attracting nearly 41.7 million visits in a single month. Automated Sexual Trafficking Identification Matrix (STIM) indicators were applied.
- Legal and regulatory review: Assessment of the UK legal framework, including the Online Safety Act (OSA), and regulatory oversight.

Key Findings

- **ASWs are a vast and hidden online marketplace.** Nearly 63,000 listings for women were recorded across 12 ASWs on a single point in time. In one month, these same sites attracted almost 41.7 million visits. Additional platforms are accessible to UK users, this is only a fraction of a much larger marketplace. The average age of women advertised on the 12 sites analysed was 25.3 years. UK nationals were the largest cohort (21% of the total number). Findings show clear and substantial demand for online sexual services at scale.
- **The scale of potential harm on ASWs is significant and geographically dispersed. 59% of adverts displayed three or more STIM red flag indicators associated with possible exploitation.** Indicators included repeated phone numbers across multiple profiles, references to drug use, “new to area” language, young age claims, and wide-ranging sexual service listings. Elevated risk signals were present across platforms and regions, not confined to major cities, suggesting that potential harm is more pervasive and geographically dispersed than previously understood.
- **ASWs are easily accessible, including to children.** Many ASWs rely on tick-box self-declaration rather than meaningful age assurance. Even where verification tools exist, they are often partial, allowing unverified users to view explicit content, contact details, and booking instructions. This creates a clear risk that children can access sexually arousing explicit material alongside lists of explicit sexual acts and services.

- **Survivors who were exploited on ASWs explained how exploitation pathways are diverse and not confined to a single demographic.** Survivors' accounts show that sexual exploitation linked to ASWs affects teenagers, students, and adult women from both economically vulnerable and relatively stable backgrounds. Pathways into exploitation often intersect with grooming, peer influence, cultural messaging that normalises or glamorises involvement, and gradual erosion of boundaries. Online environments can lower barriers to entry in ways that would not have occurred offline.
- **The design of ASWs embeds harm and restricts exit routes.** Survivors consistently described harm as structurally embedded in platform design rather than incidental. Weak verification, anonymous buyer access, menu-based sexual listings, third-party profile control, and ineffective reporting systems can enable coercion, and shift significant risk onto the women advertised. These features can entrench exploitation by eroding autonomy, fostering financial and psychological dependency, and enabling controllers to maintain oversight.
- **Support systems are insufficient and inconsistent on ASWs.** Reporting mechanisms on platforms are widely described as ineffective. Survivors reported inconsistent responses from some health professionals and police. Survivor-led exit and support services were described as a lifeline and the most impactful form of assistance. There is a clear need to expand survivor-led, trauma-informed support provision. The current lack of coordinated support makes safe exit and recovery more difficult.
- **Current legislation and regulatory guidance are not preventing harm.** Some ASWs are not meeting their duties under the Online Safety Act. Some reviewed sites did not implement key protective measures outlined in Ofcom guidance, indicating a need for closer scrutiny and potential enforcement.
- **Offline advertising of selling sex is restricted, yet equivalent online activity remains broadly permissible, reflecting a failure of the law to keep pace with technological change.** Weak age assurance, safe harbour protections, and limited application of existing offences constrain accountability. A review is needed to close regulatory gaps, align online and offline rules, strengthen child protection, and meet international obligations to reduce sexual exploitation.

In their own words: a summary

Many survivors were groomed into the 'sex trade' by people they trusted, romantic partners, friends, even mentors. Popular subscription platforms were described as the "first step" into prostitution. Survivors were lured by glamour and financial promises, only to find

"It looks glamorous... but I know what kind of hole that will drag you into."

themselves pressured into offline sex and controlled by abusers. ASWs are not isolated platforms, they were described as part of wider criminal networks. Survivors talked about links with grooming gangs, being exploited from childhood.

"[My husband] became my perpetrator... I had to earn all the money, he was doing my messages... he was beating me"

Survivors were advertised on adult services websites without their knowledge, consent, or control. Survivors described how ASWs are designed in ways that actively enabled abuse with platform features allowing third parties to control profiles, bookings, and earnings, while buyers remained anonymous and untraceable.

"I didn't even know the profile was being set up...he took me to the first client and then told me."

"The website made it easy for those controlling me to manage clients and earnings without oversight"

ASWs use tick-box menus to list sexual services, survivors said this pressured them into increasingly extreme acts. Buyer entitlement grew, boundaries collapsed, and violence escalated. Platforms that

"You will see men sharing about 'these girls that are trafficked'.....'you can get away with doing this to her'...it's just right there on the page."

combined livestreamed sexual content with in-person services blurred boundaries and fast-tracked exploitation. Survivors described being desensitised, monitored, and pushed from online performance into physical sexual encounters.

Survivors tried to seek help, but were met with disbelief, dismissal, or outright danger. Some were punished for speaking out, others were told their cases were "too complex" for support services. Fear of retaliation from organised crime kept many silent. Survivors described the platforms as inherently unsafe, structurally complicit in abuse, and impossible to regulate effectively.

"...it is literally just a platform of exploitation... If you look at what my pimp was arrested for, controlling and inciting prostitution for financial gain, that is what [the ASW] is doing...They are making a financial gain from women's prostitution...really that's a criminal offence"

"The most dangerous time for a woman is when she leaves...that's when he tried to kill me."

Introduction

Sexual exploitation is showing a clear and sustained rise in the UK. This is reflected in consistent increases in referrals to the National Referral Mechanism (NRM), the framework used to identify and protect victims of modern slavery, over the past five years. The data points to growing vulnerability among women and girls, as well as a concerning upward trend among UK nationals.

Between 2020 and 2025, referrals of women and girls for sexual exploitation rose sharply. Across all nationalities, referrals for women increased from 1,114 to 2,076, an 86% rise, while referrals for girls increased from 504 to 811, a 61% rise.

UK nationals account for a small proportion of adult female victims but a substantial majority of child victims. UK girls represented 70% of all girls referred in 2024 and 2025. Between 2020 and 2025 referrals rose from 99 to 139 for UK women, an increase of 40% and from 370 to 568 for UK girls a rise of 54%.

But this is just reported figures. Many instances of sexual exploitation go unreported due to factors such as fear, stigma, and lack of trust in authorities. Stop The Traffik estimate that 60,000 – 65,000 women and girls have been sexually exploited in the UK.¹ Globally, 70% of the estimated 49.6 million victims trapped in modern slavery are women and girls. They make up almost all victims of sexual exploitation across the world, with estimates ranging from 97-99%.²

The internet has acted as an enabler for perpetrators who are using it to reach new victims of sexual exploitation and display them online. The National Crime Agency has identified Adult Services Websites (ASWs) as significant enablers of trafficking and sexual exploitation³, reinforcing concerns that digital platforms are increasingly being used to facilitate and scale harm. This assessment reflects a broader shift in the exploitation landscape, where online environments can expand reach, reduce visibility for perpetrators, and create challenges for detection and enforcement.

Recent research has also shown the ways digital infrastructures are reshaping sexual exploitation and trafficking. The All-Party Parliamentary Group on Commercial Sexual Exploitation found that the UK sex trade operates as a highly profitable market in which demand plays a central role, with evidence indicating that many individuals involved experience coercion, control, or limited autonomy.⁴

¹ STOP THE TRAFFIK, n.d., *Intelligence Services and Exploitation Analytics*, available [here](#)

² STOP THE TRAFFIK (14 March 2024) Why are women and girls so disproportionately affected by exploitation? Available [here](#)

³ NCA, 2017. National Strategic Assessment of Serious and Organised Crime. [online] Available [here](#)

⁴ All Party Parliamentary Group on Commercial Sexual Exploitation (2021) *Bust the Business Model: How to Stop Sex Trafficking and Sexual Exploitation in the UK*. Available [here](#)

Scotland's Cross Party Group on Commercial Sexual Exploitation inquiry highlighted how 'sexual exploitation advertising websites' are 'fuelling' sexual trafficking and sexual exploitation, and emphasised that current laws are inadequate to address the scale of the issue.⁵ The Organization for Security and Co-operation in Europe (OSCE) Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings further demonstrates that this is not confined to one national context, mapping hundreds of sexual services platforms across regions to highlight the rapid digitisation of recruitment, and the growing sophistication of online operations that cross borders.⁶

This growing concern about online sexual exploitation is emerging alongside political and legislative debate across the UK. The UK Government's Violence Against Women and Girls (VAWG) Strategy, published in December 2025,⁷ sets an ambition to halve violence against women and girls within a decade and places renewed emphasis on tackling online harms. The Strategy commits to strengthening protections on digital platforms, building on the Online Safety Act, and expanding education on pornography, misogynistic influencers and deepfakes. However, the strategy lacks a comprehensive regulatory framework for platforms that profit from online abuse.

At the same time, the Crime and Policing Bill (2025–26)⁸ introduces new measures directly targeting digitally facilitated exploitation, including the criminalisation of AI-generated child sexual abuse material (CSAM) and expanded powers for law enforcement to detect indecent images on digital devices.

In Scotland, debates around commercial sexual exploitation have intensified through Ash Regan MSP's Prostitution (Offences and Support) (Scotland) Bill⁹, which sought to criminalise the purchase of sex and decriminalise sellers. The Bill, aligned with Scotland's *Equally Safe* framework¹⁰, explicitly highlighted the role of 'online pimping platforms' in facilitating exploitation. Even though it was ultimately rejected by the Scottish Parliament in February 2026, the controversy surrounding the Bill provided recognition that digital platforms are central to modern exploitation markets.^{11 12}

⁵ Cross Party Group on Commercial Sexual Exploitation (2021) *Online Pimping: An Inquiry into Sexual Exploitation Advertising Websites*. Available [here](#)

⁶ OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings (2023) *Mapping the Online Landscape of Risks of Trafficking in Human Beings on Sexual Services Websites Across the OSCE Region*. Available [here](#)

⁷ GOV.UK (2025) *Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls*. Available [here](#)

⁸ GOV.UK (2025) *Crime and Policing Bill 2025: Factsheets*. Available [here](#)

⁹ Scottish Parliament (2024–25) *Proposed Prostitution (Offences and Support) (Scotland) Bill*. Available [here](#)

¹⁰ Scottish Government (n.d.) *Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls*. Available [here](#)

¹¹ Edinburgh News (2025) *Edinburgh MSP Ash Regan welcomes Scottish Government support for criminalising purchase of sex*. Available [here](#)

¹² Northern Times (2026) *Highland MSP angry after lack of Scottish Government support brings down Ash Regan's Prostitution Bill*. Available [here](#)

In Northern Ireland in January 2026, the All-Party Group on Human Trafficking and Commercial Sexual Exploitation announced its inquiry into “pimping websites” following investigations showing thousands of indicators of exploitation on major UK adult services sites.¹³ This inquiry sits within Northern Ireland’s existing Nordic-model framework but highlights growing concern that online platforms have rapidly expanded opportunities for organised criminal networks.

Purpose of the research

Against this backdrop, the purpose of this research was to examine the role of ASWs in the UK and their potential links to sexual exploitation and trafficking, with a particular focus on the impact on individuals with lived experience (throughout this report referred to as ‘survivors’). By centring survivor voices, the research aimed to understand how ASWs shape pathways into exploitation, the harms experienced, the barriers to safety and exit, and for identifying the real-world consequences of these platforms and ensuring that recommendations reflect the needs and priorities of those most affected.

Although sexual exploitation affects men as well as women, this report concentrates on women’s experiences, reflecting the overwhelming gendered pattern of exploitation observed on ASWs. This research was shaped by the insights of survivors of sexual exploitation. It does not seek to represent the views of all consensual sex workers, as the IASC’s remit is focused on exploitation and trafficking.

In addition to exploring lived experience, the research sought to assess the potential extent of sexual exploitation facilitated through ASWs across the UK. This involved collecting and analysing publicly accessible data from ASWs, applying STIM (Sexual Trafficking Identification Matrix) indicators to identify patterns that may signal exploitation, and analyse the legal and regulatory landscape to identify gaps, overlaps, and opportunities for reform.

The overarching goal of this research was to develop evidence-based recommendations to prevent sexual exploitation via ASWs. These recommendations aim to strengthen regulation, improve platform accountability, and support survivor-led approaches to prevention and exit, ensuring that policy responses are both effective and grounded in lived experience.

¹³ CARE (2026) *New Inquiry Launched into Pimping Websites Across Northern Ireland*. Available [here](#)

Research Questions

Part 1. Lived Experience of Exploitation via ASWs

- How do individuals describe their experiences of ASWs, including pathways into involvement, the circumstances that led to their engagement, and the factors that influenced their decisions?
- What impacts do these experiences have on autonomy, safety, mental health, and economic stability?
- How do survivors explain the role of grooming, coercion, and cultural narratives (e.g., empowerment or financial independence) in shaping their entry into ASWs?
- What platform features or practices are perceived as enabling harm, exploitation, or loss of control, and how do these interact with offline dynamics such as third-party involvement?
- What were survivors' experiences of trying to exit ASWs, what support did they have?
- What do survivors think can be done to reduce the risk of exploitation on ASWs?

Part 2. Data Analysis

- What is the prevalence and geographic distribution of ASW adverts across the UK?
- Can STIM indicators identify patterns suggesting exploitation or trafficking?
- Where are potential hotspots for risk?

Part 3. Legal and Regulatory Frameworks

- How do current laws (Online Safety Act, Sexual Offences Act, Modern Slavery Act) apply to ASWs?
- Are the Online Safety Act provisions and Ofcom guidance sufficient to prevent exploitation?
- Where are the gaps or overlaps in enforcement?

Part 1: Lived Experience of Exploitation via ASWs

Beyond choice: understanding pathways into exploitation

There is no single, predictable route into sexual exploitation via ASWs. This chapter highlights that exploitation via ASWs does not affect a single demographic, nor does it rely on one set of vulnerabilities. Some women were drawn in through organised criminal networks or intimate partner coercion, while others entered through peer influence, cultural messaging, or economic pressure. Across all pathways, the presence of ASWs facilitated gradual entrapment, eroded boundaries, and obscured exploitation beneath the appearance of autonomy. This range of experiences demonstrates that no individual is immune to risk, particularly in a context where sexual exploitation is normalised and sex work is increasingly framed as aspirational or empowering. Understanding the diversity of these pathways is essential to developing effective prevention, regulation, and survivor-centred responses that recognise exploitation even when it is hidden behind a profile.

Sexual exploitation driven by organised crime

The survivors that participated in this research revealed how traffickers often operate across multiple forms of exploitation and organised crime and described how traffickers are frequently embedded in wider networks of organised crime, moving seamlessly between different forms of sexual exploitation.

Initially trafficked through an escort agency at age 19, a survivor described how the agency operated under the guise of legal escorting, yet used violence, isolation, and control to traffic girls and young women. *“She was 17 and had been involved in this from the age of 13 or 14.”* She only understood the full extent of the criminal network years later when the perpetrators’ photos appeared in the media:

“When we had all the photos of the perpetrators on the front pages... that driver was one of them.”

She emphasised that grooming gangs do not operate in silos, and that exploitation often continues after child victims turn 16.

“When the girls age out [turn 16] ... they’re often then trafficked in other ways.”

Organised crime groups operated across borders, working together to recruit, transport, control, and profit from women. Survivors believed they were entering a consensual arrangement, but later recognised that the experience reflected organised trafficking, characterised by deception, grooming, and the systematic

removal of autonomy. These networks relied on multiple actors, including recruiters, transporters, controllers, and enforcers, as well as the rapid replacement of women, indicating a structured and ongoing operation rather than isolated abuse.

“I got put into a car with three men that I didn’t know. I didn’t know where I was being taken.”

Once exploited, control was maintained through a combination of emotional manipulation, false promises, and collective reinforcement by multiple individuals. Men presented themselves as protectors and romantic partners, while systematically controlling movements, finances, and access to others. Exploitation was normalised through the involvement of women already under control of the network, who were tasked with training newcomers and enforcing compliance. A survivor described how this form of exploitation was embedded within family-based structures, making it difficult to identify clear perpetrators or escape routes.

“They do this with the whole family. Men are all married and have kids... everyone plays a role.”

Reflecting on the scale and organisation of the exploitation, she added:

“Even while he had me, he had another one in Spain. They always have another one.”

These accounts indicate the need to view exploitation via ASWs not as isolated incidents, but as part of a continuum of abuse facilitated by organised criminal networks.

When relationships become mechanisms of exploitation

Studies show that entry into sexual exploitation is frequently facilitated through trusted individuals, including romantic partners, friends, or intermediaries who present themselves as helpers or protectors.¹⁴ Exploitation is normalised over time through emotional manipulation, deception, and the reframing of harm as opportunity, empowerment, or necessity, rather than through immediate or overt force. Survivors’ testimonies in this report closely mirror these findings. They describe how their entry into ASWs was frequently shaped by grooming and manipulation, often by individuals who present themselves as romantic partners, friends, or mentors. These relationships, initially framed as supportive, gradually become exploitative.

“He said he loved me, that we’d be a family. I didn’t realise what he really wanted until it was too late.”

¹⁴ Hopkins, M., Keighley, R. and Sanders, T., 2024. Organised crime and the ecosystems of sexual exploitation in the United Kingdom: how supply and demand generate sexual exploitation and protection from prosecution. *Trends in Organized Crime*, 27, pp.56–76.

“He became my perpetrator... I had to earn all the money, he was doing my messages... It sometimes felt like I trafficked myself or I exploited myself... but he was beating me, got me into using cannabis... if I wasn’t making enough money so he could buy more cannabis, he was more violent.”

One survivor later went on to suffer labour exploitation, perpetrated by her husband’s family who forced her to work to pay off debts on their family farm in remote Australia. *“I was on the farm working off my husband’s debts to his parents.”* She described how exploitation was normalised through familial obligation and shared narratives of survival, which made it difficult to identify or resist. Her experience shows how exploitation can shift across forms, moving from partner-based coercion into forced or bonded labour while retaining the same underlying dynamics of control.

Coercion is not limited to an intimate relationship, where a partner used control and violence to facilitate exploitation through an ASWs. One survivor explained that her earlier pathway into the sex trade began with a friend who framed it as paid dating, minimising risk and disguising the reality of it:

“It was a friend that introduced me to it... they advertised themselves as like a sort of paid dating.”

“She made it sound like freedom, like I’d be in control. But it wasn’t like that at all.”

Survivors described how grooming was often subtle and embedded in cultural narratives of empowerment, influencing even young schoolgirls. One survivor recalled when she was just aged 16, and influenced by a school friend and societal messaging to join a sugaring website¹⁵ which soon escalated into selling sex:

“There was a girl in my English class... she was meeting older guys on this website ... I made an account on there... It was just a weird sort of very insidious transition... suddenly you’re walking up to hotel rooms to meet guys you’ve never met before for money.”

The illusion of autonomy was a recurring theme across survivor accounts. They described not initially seeking to be advertised on an ASW but being persuaded by their exploiter that there was value in being visible online. One survivor said she believed she was making independent choices about her involvement in ASWs at first but later recognised as: *“There was fear and a lot of manipulation involved”* operated through pressure, uncertainty, and emotional control, rather than overt force, which delayed recognition of exploitation and limited her ability to exit.

¹⁵ “Sugaring” websites facilitate transactional relationships exchanging companionship or intimacy for financial or material benefits.

Her account demonstrates how exploitation can persist even where individuals appear to consent, demonstrating the need to look beyond surface indicators of choice to understand how power and control are exercised.

Exploiting vulnerabilities

Feminist and human rights scholars have long highlighted how apparent consent can coexist with coercion, inequality, and a lack of viable alternatives, particularly in contexts shaped by gendered power imbalances, prior trauma, poverty, or insecure immigration status.¹⁶ Survivors' accounts described grooming into ASWs that was subtle, relational, and framed as help at moments of acute vulnerability. As one survivor explained that following domestic abuse, homelessness, and loss of contact with her children, she was introduced to an ASW by a female friend that she trusted. What appeared to be practical advice was later recognised as grooming, normalising exploitation and limiting perceived alternatives. Although she initially believed she was acting independently, she later reflected that her entry into ASWs was shaped by manipulation rather than informed choice.

“She showed me how easy it was to set up an account, and within forty-eight hours I met my first buyer. It was only later that I realised I had been groomed. It was made to feel completely normal, like this was just what everyone did.”

Other testimonies spoke of adverse childhood experiences. One survivor explained how experiencing sexual abuse from a young age led her to normalise harm and dissociation as coping strategies. She described internalising cultural narratives of sexual liberation in an attempt to manage shame and regain control, which masked the impact of early abuse and left her vulnerable to exploitation framed as choice. She later described being groomed by a trusted photographer, who presented himself as supportive and professional while encouraging increasingly exploitative activity and facilitating access to ASWs.

“I considered him a friend...[but]...It was unmistakably that it was grooming.”

The mainstreaming of sexual exploitation under the guise of empowerment

Survivors' accounts highlight a concerning cultural shift in which sexual exploitation is increasingly mainstreamed and reframed as empowerment. Rather than being recognised as a form of harm, involvement in ASWs is often portrayed as entrepreneurial, aspirational, or financially sensible, particularly for young women. This reframing, driven by platform practices and wider societal narratives, masks exploitation, undermines informed consent, and expands the pool of

¹⁶ MacKinnon, C.A. (1989) *Toward a Feminist Theory of the State*. Cambridge, MA: Harvard University Press.

Jeffreys, S. (2009) *The Industrial Vagina: The Political Economy of the Global Sex Trade*. London: Routledge.

individuals exposed to risk. Such narratives not only obscure harm but actively facilitate pathways into exploitation that current safeguards fail to address.

One survivor described entering exploitation from a background of relative social and economic stability. Raised in a supportive, family, she was not driven by financial necessity. Instead, she identified the influence of cultural messaging and peer dynamics that glamorised relationships with older men as shaping her pathway into the sex trade. In her view, the mainstreaming of online subscription platforms has contributed to the normalisation of selling sexual content, presenting it as accessible and, in some cases, aspirational for young women from more affluent backgrounds.

“It’s really been gentrified, it’s no longer a thing that, like, poor girls will do, or girls who don’t have parental support around them will do. It’s now become a thing that, like, just all girls seem to do.”

This shift was described as creating new pressures, especially for those who are more vulnerable, who now feel they must go further or endure more to keep up.

“It makes life harder for girls who are poor and are in situations... they now have to work extra hard and do extra horrible things in order to compete in this marketplace of women generally willing, willing to put themselves up to be exploited by dudes.”

Survivors also critiqued the way ASWs and subscription-based platforms are glamorised in mainstream media and felt that this portrayal misleads young women into viewing sex work as a legitimate career path, without understanding the potential dangers. One survivor recalled a university-issued manual that promoted prostitution as a way to pay off student loans, saying:

“It was portraying prostitution as a job opportunity... a very good way of paying off your student loans.”

“If it hadn’t have been glamorised... I would never have gone down that road.”

Marketing to university students was framed as a solution to financial pressures one survivor added that the ASW she was advertised on offered incentives specifically for students, such as free premium accounts for those with academic email addresses (denoted by ending in .edu).

Content subscription platforms as gateways to sexual exploitation

Survivors described content subscription-based platforms, often marketed as empowering and self-managed, as potential gateways into sexual exploitation. Although these platforms are primarily designed for paid content and messaging, survivors described how contact can shift quickly into pressure to meet offline, particularly when earnings are low or financial need is acute. It was described how

subscription platforms are attractive because they appear glamorous and financially transformative, while masking pathways into in-person exploitation:

“It looks so glamorous...[but]... I know what kind of hole that will drag you into.”

“Most girls... they're not earning that much money [on the subscription platform] ... so they'll probably take that guy up on his opportunity.”

Survivors described how content subscription websites and similar platforms “create norms” that push individuals toward more extreme content and offline encounters. The visibility and popularity of subscription website accounts lead to direct contact from buyers seeking in-person sex, blurring the line between online content creation and physical sexual exploitation.

“You would be so likely to be recruited,”

One survivor’s experience began with what appeared to be a legitimate opportunity for flexible online work. She answered an online advert for “adult content modelling” and was told she would be her own boss. However, once she joined, the agency took full control of her account, including her ID documents, and began posting content she hadn’t approved.

“They said it was legal and flexible... but they started posting things I never approved”

The shift from modelling to explicit performance was gradual and coercive, framed as meeting client expectations and not wasting opportunity. She reported that agencies could register multiple models under one name, with no verification of who was performing.

“The platform did not act to prove that the person streaming was the one who actually owned the account.”

Platforms built for profit, not safety

ASWs are not neutral intermediaries. Survivors' experiences demonstrate that the design, policies, and commercial incentives of these platforms can actively enable exploitation or fail to prevent it. Survivors described how platform features such as advertising structures, verification processes, payment systems, and moderation practices often prioritised ease of use and profit over safety and accountability. In many cases, these features created conditions in which exploitation could occur undetected, be normalised, or be actively facilitated. This section examines the specific ways in which ASWs contribute to harm, not only through what they allow, but through what they fail to prevent.

Risky verification that increases exposure and enables third-party control

Survivors described how some ASWs required women to complete ID verification steps to advertise, but these processes were often managed by third parties and offered little personal control. Women were typically asked to submit photos holding ID documents alongside a dated newspaper or handwritten note, and in some cases, to pose in public spaces such as next to a UK post-box to 'prove' their location. Some described being approached and harassed by men while taking these photos or noted that their exploiter was able to Photoshop ID, which was still accepted by the platform. Others said the process was managed by third parties, such as studios or group controllers.

"I had to show my ID and a piece of paper with [the ASW name] written on it... outing myself as a sex worker with my legal ID... several men approached me while those pictures were taken."

"My husband Photoshopped my ID... it was accepted without a problem."

Some survivors were not required to prove their ID at all. A survivor who joined an ASW at the aged of 16 was not asked for any ID, but a buyer she met on an ASW and subsequently had sex with asked for her ID in person to verify that she was over 16.

"I think he checked my ID to make sure I was 16, like in person, but yeah, nothing from the website itself."

One controller, many profiles: how ASWs enable multi-victim exploitation

Many of the survivors described being advertised by a third party who advertised multiple women. One survivor described how the man who exploited her advertised multiple women on an ASW through a network of interconnected profiles. Several of the accounts appeared visibly linked through shared contact details, including the same mobile number. She later came to understand that

these profiles had been deliberately structured to centralise bookings and communications, enabling him to manage several women at once while financially benefiting from their exploitation.

“The pimp had different profiles connected to him... you can have like a page and then it connects to the different women’s profiles... he kind of had all these groups of profiles together with the same mobile number and contact details.”

She also noted that when the police arrested him, they found spreadsheets and extensive data on his laptop, indicating a systematic and financially motivated operation.

“He was charged with controlling and inciting prostitution for financial gain... they seized thousands of pounds in assets.”

Another survivor described being part of a group managed by a man who controlled multiple profiles and communications. She explains how Brazilian women in the group that he managed were misled before their arrival and trafficked into the UK. They had no access to their own accounts and were sent to buyers without informed consent. She described how he handled all communications with buyers, including responding to emails and arranging bookings:

“None of us had access to the emails from buyers. They came directly through him, he answered as if he was us and then he would send me a message saying, oh, this person, you know, this is where you're going to meet them. And this is what you have agreed to do.”

When “independent” profiles mask coercion and third-party control

Survivor accounts demonstrate that ASWs profiles are unreliable indicators of working independently or of consent. Whether managed entirely by a third party or doctored to conceal age or circumstances, the illusion of independence masked deeper exploitation, making it impossible for buyers, or observers, to know whether the woman was acting freely. ASWs profiles can be entirely misleading, portraying an independent, consenting sex worker, while in truth they were being harmed and controlled.

“[I was] being raped on webcam essentially. And of course, the people watching aren’t aware of that... the profile is written so it sounds as if I’m independent and enjoying it... how do you go behind a webcam to make sure that the woman isn’t being coerced?”

Buyers on some forums could openly discuss which women are trafficked or controlled and the benefits this has for sex buyers:

“You will see men sharing about... ‘these girls are trafficked’... ‘you can get away with doing this to her’... it’s just right there on the page.”

One survivor explained how the structure of the website removed any sense of safety or autonomy. Because anyone could contact her without proving who they were, she was exposed to a constant flow of unknown individuals, some of whom went on to manipulate, pressure, and control her. She explained that the absence of checks meant she couldn't distinguish between legitimate contacts and those looking to exploit her, and the website provided no tools to limit or manage this access.

"There was little verification or oversight... I had no control over how people approached me."

Another explained that when her phone number was listed on an ASWs, men would often contact her directly, but she couldn't be sure who would actually turn up. She described how others sometimes answered her phone, impersonated her, or gave out details without her knowledge. This created a situation where buyers could bypass platform safeguards, and she had no control over who was coming to see her. She also noted that even if she blocked someone, they could easily create a new profile and return, making it impossible to ensure safety or accountability.

"Sometimes they would answer the phone and give the details out ... or pretend to be me."

This highlights the lack of transparency and control over buyer identity and interactions. Even ID verification does not necessarily confirm the consent of the individuals being advertised.

Anonymous buyers shift the risk onto women

Survivors repeatedly described how ASWs allow buyers to remain anonymous, with no requirement to provide ID or verify their identity. This lack of buyer accountability was seen as a major safety flaw, allowing exploitation to flourish while placing the burden of risk entirely on the women advertised. They described how men were able to contact them anonymously, with no way of knowing their identity or intentions.

"There was never any guarantee... I really don't know what they could have done... people weren't, as far as I know, they weren't identity verified."

"Those men that are looking at those websites are the ones that phone to book an appointment and you don't know who's coming... it could be a murderer all you know. The website doesn't know who's contacting you, so it's really unsafe."

They described how this created a power imbalance, where buyers felt entitled to services simply because they had paid. They also noted that reporting mechanisms were ineffective, as buyers could easily create new profiles and phone numbers, making them untraceable.

"...they could turn out to be stalkers... we all use burner phones... even if you report them... they'll literally have three other [profiles]."

"You don't know if these men are who they say they are... even if they turn up, they might bring somebody else with them."

Survivors described how ASWs often facilitated initial contact, but interactions quickly moved to off-platform channels like WhatsApp, where safety deteriorated. One survivor reported receiving rape and death threats from a buyer after refusing to meet, noting that once communication left the website, the platform took no responsibility.

"You'd get someone's number, you'd move to WhatsApp... I did have, like, death and rape threats once from someone."

Menu design that normalises harm and escalates demand

ASWs were consistently described by survivors as platforms that not only facilitated exploitation but actively shaped its nature. A central feature of these websites is for advertisers to complete a tick-box menu of sexual services. This was identified by survivors as a key mechanism through which women were pressured into increasingly extreme acts. The menu system, which requires individuals to list services offered, was seen as normalising violence and creating a competitive environment where boundary-crossing became routine.

"It's like a menu... buyers themselves encourage that type of behaviour. They'd say, 'Oh, there's this other woman who's doing this,' and then you're being spat on, urinated on, defecated on... you start crossing the boundaries and then you just cross another one more boundary."

Survivors also described how the menu system contributed to buyer entitlement and the normalisation of violence. Buyers used the menus and review systems to justify increasingly aggressive behaviour, often referencing what other women were willing to do.

"If somebody marks you... the next buyer will think that's a green light to exceed that."

Economic vulnerability further compounded the coercive nature of ASWs. Several women described how financial desperation made it difficult to refuse buyer demands, especially when the platform's structure incentivised extreme services.

"At the beginning you say, 'I'm not doing this, this, this and that,' but then eventually you're going to end up doing them anyway."

"If you don't have the option to advertise for very cheap or for no money, you might have to go back to a pimp or a third party."

These accounts imply that ASWs are not neutral platforms but active facilitators of harm, where more extremes of harm are actively encouraged by the design of the websites.

Dual-function platforms that blur boundaries and increase risk

Survivors described how platforms that host both livestreamed sexual content and facilitate in-person sexual services create heightened risks of exploitation. These dual-function environments were seen to blur boundaries, normalise progression from online to offline sexual activity, and enable exploiters to maintain control while remaining hidden. One survivor reflected on her experience in a video chat studio, where she was live-streamed from Romania on a UK-based adult website. She had no access to her account, earnings, or even knowledge of how she was being advertised. *“I didn’t have any control over accounts, over the money I was making, over passwords, logins or anything like that,”* she explained. She later recognised this as trafficking, despite not meeting clients in person at the time. She was then trafficked across Europe for in-person sexual exploitation. She described how her online exposure made her more vulnerable to being trafficked for in-person sexual exploitation:

“You’ve been naked in front of others... so what’s the change if you do it actually in front of someone?”

“It’s sort of grooming... you start crossing the boundaries and then you just cross another one more boundary to go see someone.”

This desensitisation process was echoed by other survivors, who described how livestreaming and video chat features were used by exploiters to monitor, control, and profit from their activity, often under the guise of support or technical help. The combination of anonymous buyer access, lack of financial transparency, and the normalisation of boundary-crossing was seen to facilitate a seamless transition from online sexual content to offline exploitation.

Safety tools that do not lead to action

Some ASWs include links to peer support networks where women can share warnings about violent punters or controlling pimps. However, survivors emphasised that it does not go beyond sharing information and support. There are no links to exit services, and no real support for women who want to leave the industry. Some survivors felt that these systems are well-intentioned but ultimately help to sustain the sex industry by normalising risk and failing to offer alternatives. The ASWs leave it up to the women to support each other.

“There’s never links to sort of Women’s Aid or anything that would get you out. It’s almost... like they’re helping to keep the industry going.”

“Basically all you’re doing with [peer warning networks] is... you can let each other know about that person... but it doesn’t go any further than that.”

Survivors consistently described reporting mechanisms on ASWs as ineffective or absent, particularly when abuse occurred off platform. One survivor had reported multiple incidents of sexual harassment but received only a generic email stating there was “insufficient evidence” to investigate. She noted that once contact moved to WhatsApp, the platform no longer took responsibility. This mirrors experiences of others who said there was no clear way to report feeling unsafe. Survivors felt that platforms failed to act on reports, leaving them vulnerable and unsupported.

“I think I did get an email saying there is insufficient evidence for this to be investigated... apparently things that happen on WhatsApp, I don't think they take responsibility for.”

“There's never any support offered if you want to report.”

Survivors' experiences of adult services websites as unsafe, unaccountable, and profit-driven are strongly supported by parliamentary, academic, and policy evidence. Far from acting as neutral intermediaries, adult services websites are increasingly recognised as active facilitators within systems of sexual exploitation.

The impact of being exploited online

The testimonies in this section demonstrate that the harms of online sexual exploitation are neither contained nor temporary. They accumulate, compound and endure, affecting health, relationships, safety, economic security and identity. For many survivors, the impacts continued long after exit, shaped by digital traces they could not erase, trauma embedded in the body, and systems that failed to recognise or respond to what they had endured. These accounts challenge the perception of online environments as neutral or benign. Instead, they reveal how the design of adult services websites enables coercion, facilitates violence and embeds control in ways that magnify danger and restrict escape. Understanding these impacts is essential to designing effective prevention, protection and support. Survivors' insights make clear that meaningful change requires confronting not only individual acts of exploitation, but the digital infrastructures that make such harm possible.

Psychological harm, fear and the reshaping of identity

Women consistently described how the online environment stripped away their autonomy, rapidly pushing them into acts they did not choose or understand. One survivor spoke about how webcam exploitation acted as a gateway that desensitised her and made her vulnerable to later trafficking. She had no control over her profile, earnings, communications or working conditions; she did not even know how much money she was earning. That lack of control taught her to override her instincts, cross her own boundaries and accept behaviour she felt unable to refuse. This erosion of autonomy continued long after she stopped: years later, she described being unable to tolerate any intimate contact at all, showing the lasting physical and emotional effects that repeated violations had left behind.

"I couldn't bear another man. I couldn't bear another anything."

Another testimony demonstrates the deep emotional and psychological harm caused by being advertised online. Although initially believing she was working independently, the reality was constant fear, unpredictability and danger. Not knowing who was coming to the door, or what they would do, created enduring trauma, shaping how she relates to men and how safe she feels in everyday life. She described feeling angry, ashamed and betrayed by a society that glamorises commercial sexual exploitation, leaving her with lifelong mistrust. She expressed a sense that the experience "*screwed up*" her ability to build healthy relationships. Her experiences with health services also produced long-term harm. Disclosures she made when she was scared and desperate were recorded permanently in medical files, leaving her feeling stigmatised and exposed every time she sought care. The very systems she turned to for help left her with new forms of vulnerability.

"It's all over my medical records... I still feel judged."

It was described how ASWs contributed to a long-term erosion of bodily autonomy. Over time one survivor found herself pushed into acts she never intended or felt comfortable with, and even years after leaving she continues to live with the physical after-effects of trauma. She explained that exploitation had left her with somatic memories where the body holds on to experiences long after the events themselves.

“Sometimes... just physically, I just feel violated still.”

This ongoing bodily distress illustrates how the harms of online facilitated sexual exploitation do not end when the exploitation stops, and how deeply such experiences can embed themselves in survivors’ internal sense of safety and self for years to come.

Financial exploitation, coercion, and emotional harm from direct access

Other testimonies show how ASWs facilitated direct, unverified access which quickly became manipulation and control. They recounted pressure, threats and fear, with intermediaries who *“promised protection”* then taking portions of earnings and dictating how they would be paid. The impact was financial exploitation and a sustained sense of having no choice, even while the profile appeared to show independence.

“It looked on the outside like I was making my own choices... but there was pressure, fear and a lot of manipulation.”

“Intermediaries... would take a portion of my earnings or make decisions about how I could get the money.”

They emphasised the emotional toll of constant contact from unknown men and the absence of meaningful oversight, noting that attempts to report abuse led nowhere, and that finding help was difficult and delayed, limited to basic guidance to stay safe.

“Almost everything [felt unsafe]... people could just reach out directly... there was little verification or oversight.”

“I did try to report... it was difficult. There was no follow up or support... the system wasn’t designed to protect.”

Physical danger, extreme violence and normalisation of harm

Survivors described how online platforms funnel women into escalating violence not only by being made visible to dangerous men but by being pushed into increasingly extreme acts via their “menu” systems and niche categories. One survivor described how buyers compared her with other women and weaponised the platform’s structure to coerce her into acts that caused suffocation risk, danger of spinal damage, and serious injury. She recounted multiple situations in which she feared she would die. Her account shows how online systems create the

conditions for extreme forms of abuse that would be far harder to orchestrate without the infrastructure these platforms provide.

“I thought if I had tattoos, then if a buyer killed me, they’d at least be able to identify the body.”

“I would be suffocated... men sitting on my face, taking their weight on me.”

The psychological aftermath was often described as deeply embodied. Survivors spoke of persistent physical memories of acts they felt unable to stop, alongside periods of emotional collapse followed by attempts to reinvent themselves through new identities or personas. Over time, repeated exposure was understood to erode a stable sense of self.

“I have to perform and pray to myself or dissociate. And that is what I did.”

Survivors also highlighted the ongoing harm associated with digital permanence. Even after deleting profiles, archived images and screenshots continued to circulate online, creating unavoidable reminders and a sustained risk of re exposure. For many, this digital residue functioned as a continuing violation that extended the impact of exploitation long after they had exited.

“I don’t know how many images or videos of me are still online, and I have no way of removing them.”

Institutional harms, image misuse, and entrapment through hidden negotiations

Survivors described how these platforms enabled third parties to exert control, creating harms that continued long after the exploitation had ended. Several reported that, when they disclosed their experiences to statutory services, they were met with blame or were treated as though their circumstances reflected personal choice rather than coercion.

Accounts further highlighted forms of digital coercion. Survivors described situations in which third parties created and managed online profiles without their knowledge, uploading images from bookings without consent and monetising content in private galleries. Some only discovered that intimate images were already circulating online after buyers had shared them, leaving them with little control over how their bodies were represented or sold.

Survivors also reported being directed to buyers whose expectations had been negotiated in advance without their agreement. These encounters were described as involving significant safety risks, including exposure to individuals expressing harmful sexual interests and others who became violent during bookings.

"...he wanted me to watch child pornography with him... he kept talking about it... the pimp already knew that this guy was going to be into this stuff and sent me there anyway."

"Another client was drunk on arrival and got really angry with the suggestion of using a condom... he got really violent and the pimp had to come in and negotiate prices."

Seeking help and support

Survivors' testimonies reveal a support landscape that is fragmented, inconsistent and often unsafe. Many found that services lacked the specialist understanding needed to recognise coercion, online exploitation or third-party control. Others encountered disbelief, ideology or exclusion. Fear of perpetrators, fear of authority and the absence of safe pathways out further trapped women in cycles of abuse. Yet survivors also showed what effective support can look like: specialist refuges, trauma-informed practice, stable housing, prevention, and survivor-led networks that offer safety, validation and hope. A system built around these principles is essential if survivors are to be believed, protected and supported to rebuild their lives.

A system that fails survivors when they ask for help

Survivors consistently described reporting mechanisms on adult services websites as ineffective or, at times, absent, particularly when harm occurred beyond the platform itself. Several reported incidents of sexual harassment but received only generic responses indicating that there was insufficient evidence to proceed. Once communication shifted to private messaging services, survivors felt that platforms no longer accepted responsibility.

Others emphasised the lack of clear pathways for reporting safety concerns, noting uncertainty about where to turn when they felt at risk. Survivors also described how buyers could use disposable phone numbers and quickly create new profiles, making them difficult to trace and limiting accountability. Across accounts, survivors expressed a shared perception that platforms failed to respond meaningfully to reports, leaving them feeling vulnerable and unsupported.

"There's never any support offered if you want to report."

Some survivors described how their ability to seek help was delayed or obstructed by a lack of recognition that what they were experiencing was sexual exploitation. That lack of recognition was both personal and institutional. Survivors described significant barriers to recognising exploitation and seeking help, often rooted in shame, misinformation, and systemic failures.

"I felt a lot of shame... I didn't really think anyone would believe me... there's so much shame attached to it."

"At first, I felt ashamed to even tell anyone... I thought people would say it was my fault."

One survivor described how her perpetrator reinforced this belief, and how her role as a mother further complicated her ability to disclose abuse:

"I remember one night he was beating me on camera... I didn't scream because I didn't want to wake my children up."

When support services reinforce the system instead of challenging it

Survivors described significant barriers when attempting to access support, often feeling that services did not fully understand the online dimensions of exploitation. Some reflected that the absence of clear information about exploitation and domestic abuse delayed their ability to recognise what was happening to them.

"Nobody stopped me and gave me information about how does it look like when somebody isn't supporting you in sex work but [actually] exploiting you."

It was noted that interactions with sex worker organisations and sexual health clinics appeared to reinforce narratives of empowerment, which one survivor felt obscured her experience of coercion:

"All of them, the only topic we had was how empowering sex workers are... so there was no information about sex trafficking."

Another survivor described seeking help from healthcare professionals but encountering what she perceived as indifference:

"I would tell them hoping they would help me... but it was almost like they accepted it. There was no support or help."

Survivors also highlighted challenges accessing refuge accommodation, particularly where their circumstances were viewed as complex. One survivor recalled being advised not to disclose the full extent of her sexual exploitation due to concern that it might prevent her from being accepted into a women's refuge for domestic abuse:

"Women's refuges won't take women escaping pimps and gangs because it's seen as too complex."

Too frightened to leave: when escape feels more dangerous than staying

Some survivors report not seeking help because they felt it was just too dangerous. They were aware that their perpetrators were often linked to organised crime gangs and seeking help to leave their exploiters could put them into even more danger than the exploitation they were currently experiencing. Survivors also feared for the safety of their children or families.

"...the most dangerous time for a woman is to leave ... the point at which my perpetrator actually ended up trying to murder me was because I told him I was leaving. And it's the exact same with pimps. It's not like you can say, right? I'm not doing this anymore. And they go. OK. Bye. It's dangerous. People don't report dangerous."

The pimp's knowledge of where their victims lived kept them trapped, returning despite attempts to leave.

"He knew where I lived... I did try and leave a few times but... I just think... you just get pulled back in."

One survivor's attempt to escape trafficking led her into another abusive situation, driven by a need for protection from organised crime. After months of being trafficked through an escort agency, she realised the danger she was in and sought a way out. Tragically, the only perceived safe option was to return to a former abusive partner:

"... sadly the way I got out of it was to go back to my former abusive partner... purely for the protection side of it."

This decision highlights the extreme lack of safe exit routes for women facing exploitation, especially when perpetrators are part of organised criminal networks.

One testimony described how a survivor was denied protection by police unless she testified under her real name, which she was not prepared to do as she was so scared of her exploiters and feared what they might do to her family. This led to the police not taking their investigations further:

"She said, 'I'm afraid of them, I won't put my child and my life in danger'... and they said, 'OK, then we're not going to do anything.'"

As well as controlling adverts, accounts and earnings, many women described being dependent on their exploiter for fundamental necessities such as housing and accommodation. When the roof over your head is tied to the person exploiting you, the possibility of leaving collapses. Exit becomes impossible when survival itself depends on the abuser. One survivor explained that after being homeless and staying in hotels, she joined a group in which one man ran the accounts of many women and was advertised on ASWs. He secured her a studio flat in Central London from which he sold her online for in person sexual services.

"The person who ran my group... was able to get me a studio flat in [Central London] and that was where I then lived and saw buyers at the same time... My accommodation was tied to being in his group and I had such a high level of anxiety about being homeless..." –

When social services choose disbelief over protection

Survivors described moments of reaching out for help, only to be met with disbelief, dismissal, or inaction by authorities. One survivor described reporting sexual exploitation to a social worker but she was not believed and this admission was used against her in a family court. She felt that if she had been believed at that time, years of abuse and upheaval for her child could have been prevented.

"I actually told them because I wanted them to help me ... If they had reported it to the police at that point, I wouldn't have been in that situation for as long as I was. And like I've told them because I wanted help, but instead they used my choices to show that I was mentally unstable."

These accounts reveal that help-seeking is often obstructed by a lack of recognition, inadequate services, and fear of disbelief or reprisal. Survivors emphasised the need for specialist, trauma-informed support and clear pathways to exit, particularly for those navigating coercive relationships and economic dependence.

Specialist, trauma-informed support is essential

Survivors recommended a shift in focus from harm reduction to prevention and exit, and called for more trauma-informed, accessible services.

"I think exit support services... are few and far between,"

A recurring theme across survivor testimony was that mainstream services are often ill-equipped to recognise, understand or respond to the dynamics of exploitation facilitated through adult services websites. One survivor described experiences of approaching support only to find services shaped by ideological divisions or polarised debates about sex work, which left her feeling judged, misunderstood, or simply not believed. For her, and for others with similar experiences, specialist provision is essential not only because it offers safety, but because it ensures that staff have the training and insight needed to identify coercion, third-party control, trauma responses, and the complexities of online exploitation.

Specialist refuges, in this context, are not just crisis accommodation. They represent a space where survivors can be met with expertise, neutrality, and trauma-informed care, free from the assumptions that sometimes dominate generalist or politically aligned services. Survivors underlined the importance of services that function outside ideological positions and instead prioritise survivor safety, autonomy, and recovery.

"real support, counselling, safe housing... prevention is better."

Taken together, these reflections demonstrate the need for survivor-led, holistic support systems that prioritise safety, trauma-informed practice, and long-term recovery. They point to the importance of specialist provision, access to stable housing, emotional and psychological support, and services designed with and for survivors rather than imposed upon them.

The need for trauma-informed, survivor-centred policing

Descriptions of lived experiences with the police across the interviews reveal a pattern of inaccessibility, fear, and lack of meaningful protection. Several survivors described instances where they attempted to report exploitation or dangerous individuals, only to be met with indifference or procedural barriers.

"I sent them a whole lot of different stuff... and I had no response from that either."

Fear of the police emerged as a recurring theme, both in terms of direct law enforcement contact and the potential repercussions from exploiters, who were often present during visits.

"They knocked on my door once and I ran out the back... That was my fear of the police."

"He was sitting next to me... they weren't bothered by him either, even though he definitely qualifies under pimping."

Survivors described how, when police did engage, their actions were sometimes perceived as superficial. One survivor recalled officers visiting the premises where she was working, asking only whether the women were there voluntarily, and leaving without further investigation:

"They just kind of... said, 'Are you wanting to be here?'... Once we'd all said yes, they were basically like, OK, that's fine."

The experiences of survivors reflected a complex and occasionally contradictory relationship with the police. While some individuals reported receiving support and validation, others described encounters marked by disbelief, dismissal, or institutional shortcomings.

One survivor reported a rape and subsequent death threats from a man she had met through an ASW. Although she described the police as "sympathetic" at the time, she ultimately felt unsupported:

"I just wanted them to have a record of his number... I didn't really think there was very much that they could do."

Another survivor's contact with police followed an attempted homicide by her perpetrator. She was taken to a refuge and spoke positively about the domestic violence liaison officer who assisted her. However, she was advised not to disclose the full extent of her exploitation, as refuges may decline individuals considered "complex cases", including those involving trafficking or the sex trade.

A different survivor described a notably more positive experience. After escaping her exploiter and relocating, she reported him to the police and found officers to be responsive and trauma informed:

"They treated me like I was a victim of exploitation and trafficking... not like I was a sex worker by choice."

She further contrasted this response with earlier interactions with social services:

“My experience when I reported it was really positive. They immediately recognised it as a trafficking and exploitation case... They didn't treat me like I had chosen it.”

Her perpetrator was subsequently arrested and convicted, and his assets were seized. However, she described previous engagement with social services as stigmatising, stating that professionals attributed her circumstances to personal choice:

“They said it was my choice... they sided with my son's dad in court because of the 'choices' I was making.”

Overall, the testimonies suggest that while some progress has been made in recognising exploitation, significant gaps remain in how police and related services respond to survivors. The need for trauma-informed, survivor-centred policing is clear, as is the importance of consistent training across agencies to ensure victims are not retraumatised or dismissed when they seek help.

The lifelines built by women failed by the system

Across multiple survivor testimonies, informal and survivor-led support networks emerged as critical lifelines for women seeking to escape sexual exploitation. These networks often provide emotional validation, practical advice, and a sense of solidarity that formal services failed to offer.

Survivor testimony consistently demonstrates the critical role that survivor led initiatives play in providing safe, validating environments for women who have experienced sexual exploitation. Several participants described these spaces as more trustworthy than mainstream services, particularly after encountering dismissal or ideological resistance elsewhere. One survivor reflected that survivor led projects felt much more supportive, especially after she felt silenced within some sex work advocacy spaces that challenged her interpretation of her experiences as exploitation.

“I'm so glad we have projects like this where it's sort of safer and hopefully, you know, useful.”

For some survivors, involvement in peer support became a pathway to recovery and advocacy. One survivor described how, after escaping trafficking, she began working with charities supporting women in the sex trade. These organisations collaborated with police during trafficking operations, helping ensure that women had access to immediate emotional support and trauma informed care:

“We would go with the police because we would be able to provide that trauma informed approach and that women to women support.”

Her lived experience informed outreach strategies and strengthened calls for improved safeguarding protections. She emphasised the importance of exit

focused provision, observing that many mainstream services lacked clear pathways out of exploitation.

Another survivor, now a trained counsellor, facilitates small weekly online groups for women who have experienced trafficking. Structured to promote reflection rather than advice giving, these sessions encourage participants to process trauma through shared understanding, fostering empowerment and emotional recovery. Such approaches align with evidence that trauma informed, survivor centred models are particularly effective in supporting long term healing.¹⁷

Similarly, one survivor who now supports women leaving the sex industry described transforming personal harm into collective purpose:

“I’d like to save young women from making that mistake that I made.”

Despite these examples of effective peer support, survivors’ accounts reveal persistent systemic barriers within mainstream services. Evidence suggests that many professionals lack the specialist training required to recognise coercion behind an apparently independent sex work profile, or to identify the complexities of online exploitation and third-party control.¹⁸ More broadly, research highlights significant gaps in support provision for survivors of sexual exploitation, particularly where exploitation is facilitated online. Specialist services remain limited, fragmented, and difficult to access.¹⁹

¹⁷ Hopkins, K., Keighley, A. and Sanders, T. (2024) Research on online exploitation and third party control in the sex trade.

¹⁸ Ibid

¹⁹ European Parliament (2021) *Report on the Situation of Women in Prostitution in the EU*; Office of the Federal Ombudsperson for Victims of Crime (2022) *Survivors of Trafficking Support Review*.

Reform or regulation

Survivors' reflections revealed a consistent message: ASWs create conditions in which exploitation can flourish. Many described the platforms as inherently unsafe, pointing to the anonymity they afford buyers, the ease with which third parties can advertise and control women, and the lack of meaningful oversight or accountability. For these survivors, ASWs normalise harmful behaviours and enable profit at the expense of safety, leading some to argue that the sites cannot be made safe under any circumstances and should be banned altogether.

Others, while still highly critical, offered suggestions for what meaningful change would be required if ASWs continue to operate. Their proposals centred on reducing opportunities for anonymity, introducing effective mechanisms for monitoring and intervention, and ensuring that safeguarding measures genuinely protect those being advertised rather than shielding platforms from liability. Survivors emphasised that any future regulatory approach must put the safety, agency, and rights of women at the forefront, rather than treating safety features as a procedural formality.

Can ASWs ever be safe?

Survivors were clear that adult services websites are inherently unsafe describing them as platforms that enable, normalise, and profit from exploitation. They consistently emphasised that the nature of these websites attracts predatory men and creates conditions where abuse becomes routine. Many survivors felt that there is no way to make them safe.

"[The ASW] is making money from every woman advertised... they're like an online pimp"

"[ASWS] are always going to attract dangerous people ...men like that don't care about women's safety."

"The website made it easy for those controlling me to manage clients and earnings without oversight."

Survivors felt that ASWs further increase demand for sexual services which in turn increases the potential for sexual exploitation. As one survivor warned ASWs "*channel demand*" and "*create norms*" that escalate violence and exploitation.

Survivors stressed that ASWs give no reliable way to know whether women have genuinely consented to being advertised, or whether someone else is controlling the profile on their behalf.

"They gave traffickers a place to advertise you like a product without anyone really checking if it is safe or if I even consented."

“Who’s behind the profile or who’s really controlling it?”

Survivors were also concerned more generally about harms to society and what messages it sends when buying women online becomes normalised:

“It’s not acceptable that men can go out and buy women like pizzas... it affects society as a whole.”

Some survivors call for an outright ban of ASWs

Many survivors argued that ASWs should be banned entirely, believing that no amount of regulation could make them safe. They described these platforms as inherently exploitative, enabling abuse and normalising harm under the guise of choice and consent. For these respondents, the risks were too great to justify their continued existence.

“I think it should just be made illegal altogether... because it’s such a billion-dollar industry, I don’t think that’s going to happen, but it should.”

“There’s no safe way to run them. Shut them down,”

Some survivors felt that banning the websites would strike at the infrastructure that enables traffickers to advertise women and funnel men to exploitative situations:

“They always find a way, but taking away the websites would make it harder.”

“If they made those websites illegal tomorrow, it would make it very difficult for those criminals to get men to come through the door.”

As survivors set out why adult services websites should be banned, some emphasised that so-called safety measures would never make the platforms safe.

“Safety features look good on paper, but they do not actually stop traffickers... it’s more about protecting the sites legally than keeping us safe.”

What survivors said would need to change if ASWs continue to operate

While some survivors advocated for banning ASWs, others offered suggestions for improvement. They described ways that ASWs could reduce risk if they were required to change their design and operating practices.

Survivors called for improvement of ID verification for those advertised on ASWs. One survivor argued that verification could help, but only if done *“the right way”* and through systems that do not expose women’s identities or create new risks. She proposed using banks or trusted identity providers to confirm adulthood

without handing sensitive documents to ASWs, stressing that third party ID verification is more trustworthy than adult websites for safeguarding identity data.

Survivors stressed that stronger verification is necessary, not only for the women advertised but also for the men using the sites. One survivor suggested that if men had to verify their identity, this could create greater deterrence and accountability, reducing the likelihood of assault or escalation.

“If they actually had to have ID and be verified... it would be safer.”

Once advertised on ASWs, most bookings move to end to end encrypted messaging such as WhatsApp, or emails, texts and mobile phones. Survivors talked about the harms of such anonymous booking offline which undermined any verification process. One survivor suggested that requiring booking through the platform could improve traceability and reduce harm.

“Not many of them booked through the website... if they had to book through the website, that could potentially make it safer.”

Survivors argued that ASWs should take responsibility for what is happening on their platforms, including better monitoring of adverts and user behaviour. One survivor suggested that stricter checks, routine monitoring and proactive action against exploitation could make websites safer:

“The website could be safer if only these people take responsibilities... stronger monitoring of all adverts, and stronger reporting systems that actually lead to action.”

Participants also highlighted a lack of information about exploitation, coercion or how to seek help, which left them vulnerable and unsupported. One survivor felt that websites should include guidance that is practical and linked to real services, explaining that ASWs should provide:

“exploitation tips... we cannot just hide the hand behind the profile.”

Another echoed this more broadly and called for website policies and protections to be shaped by survivors with lived experience to ensure they are grounded in the realities of online exploitation.

“Policies and protections need to be designed with real experiences... to make websites more accountable.”

Finally, survivors stressed that platforms should be held responsible for the harm facilitated through their services, arguing that ASWs put profit before safety. One survivor summarised this powerfully:

“These websites... they put profit before safety most of the time. If they are allowed to keep operating, they should be held responsible for protecting people from exploitation.”

Part 2: Data Analysis

Prevalence of ASWs and assessing potential levels of exploitation

This section outlines how data was collected from ASWs to understand the scale, patterns and potential indicators of exploitation across the UK. Survivors describe how exploitation is often concealed behind apparently independent profiles. This structured data analysis provides an essential complementary lens to survivor testimony to understand the potential scale of that exploitation.

There is no official count of ASWs. The online sector is diverse and difficult to quantify, and researchers emphasise the challenges of mapping this rapidly shifting landscape.²⁰ Analysis for this report was taken from a sample of twelve of the ASWs that advertise in the UK to better understand the size of the online market, the volume and distribution of advertising activity, and the presence of indicators associated with trafficking and exploitation.

The analysis systematically collected, cleaned and standardised data from multiple ASW platforms, creating a unified dataset. Using this dataset, the IASC applied the Sexual Trafficking Identification Matrix (STIM) methodology,²¹ a framework used by frontline practitioners to identify observable indicators associated with potential sexual exploitation and trafficking. This provided a structured assessment of risk indicators commonly associated with trafficking.

Understanding prevalence is crucial for two reasons. First, ASWs operate as high-volume environments where individual exploitation can be easily concealed behind professionalised presentation and apparent autonomy. Second, the scale and distribution of advertisements can obscure patterns such as clusters of adverts linked by shared contact details, or geographic concentrations of high-risk indicators. These patterns are only visible when using structured, data-driven analysis.

The approach integrates several analytic components:

- Data collection and standardisation allowed comparison of information across platforms.
- Application of STIM indicators enabled identification of adverts with features associated with trafficking risk.

²⁰ Sanders, T., Scoular, J., Campbell, R., Pitcher, J. and Cunningham, S. (2018) *Mapping the Online Sex Industry*. University of Leicester and University of Strathclyde.

²¹ L'Hoiry, X., Moretti, A. and Antonopoulos, G.A. (2024) 'Identifying sex trafficking in adult services websites: An exploratory study with a British police force', *Trends in Organized Crime*, 27, pp. 34–55.

- Geospatial analysis then mapped these indicators across the UK, helping to identify regional patterns and potential hotspots of exploitation.

For this analysis, data from advertisements were captured on different days between 4th and 18th January 2026 from a sample of twelve Adult Services Websites operating in the UK. This snapshot approach provides an overview of the volume and characteristics of advertisements present on these platforms at that moment, and allows identification of patterns, concentrations of activity, and potential indicators of exploitation within the available dataset.

Volume of advertisements across ASW platforms

A total of 62,900 advertisements were collected across the sample of twelve Adult Services Websites included in this analysis. The volume of listings varied considerably between platforms, reflecting different levels of market penetration, user activity, and commercial prominence within the UK online sex market.

The largest platform in the sample hosted 16,126 advertisements, while several others carried smaller numbers. These differences highlight the uneven distribution of advertising activity across the ASW landscape, with a small number of sites accounting for a significant proportion of all listings.

Traffic data for the twelve platforms provides additional insight into the scale of user engagement across the online adult services market. According to online web traffic estimates for January 2026, the sites collectively attracted nearly 42 million visits over the month. These figures reflect total global traffic rather than UK-specific usage; however, despite this including international visits, the data still offers a clear indication of the overall scale and visibility of these platforms.

It is important to note that the number of listings does not represent the number of currently active women. Some advertisements may have expired, been removed, or remained live despite no longer being in use at the time of collection. Individuals may also advertise across multiple platforms, which could introduce some duplication within the overall count. These limitations mean the figures should be interpreted as a measure of platform activity at the time of data collection rather than a direct estimate of the number of women involved.

Applying STIM indicators to the dataset

The Sexual Trafficking Identification Matrix (STIM) is a framework developed to identify potential indicators of trafficking within online advertisements. It assigns risk scores from 0 to 3 across several observable characteristics, where higher scores indicate a stronger association with potential exploitation. The matrix covers four domains:

- *Photographs and images*, which assess visual features and patterns.
- *Language, details and description*, which examine text and structure.
- *Services and pricing*, which consider advertised services and price variations
- *Other intelligence*, which uses external information and relational patterns.

STIM was originally designed for use by frontline practitioners who examine individual advertisements one profile at a time. Many of the indicators rely on close reading, contextual judgement and qualitative cues that are only visible at the level of a single advert. Since this study uses data aggregated across twelve ASWs, we applied STIM at a macro level. This meant that several indicators could not be used for automated analysis. Some indicators require visual inspection of images, others rely on narrative interpretation of text, and some depend on contextual intelligence in the local area which are not suitable for platform-level data.

For this reason, 16 of the 35 STIM indicators were found to be suitable for automation in this dataset. These indicators were selected because they could be translated into structured rules using the data fields available in the scraped material.

These decisions were informed by expert advice drawn from multiple sources, including practitioners familiar with STIM, analysts working on online exploitation, and specialists in trafficking risk assessment. Although the selection process was grounded in professional judgement, the results remain sensitive to the choices made about which indicators could be meaningfully adapted for macro-level analysis. It is important to interpret findings considering these parameters, particularly because some aspects of exploitation may not be detectable without practitioner review of individual advertisements.

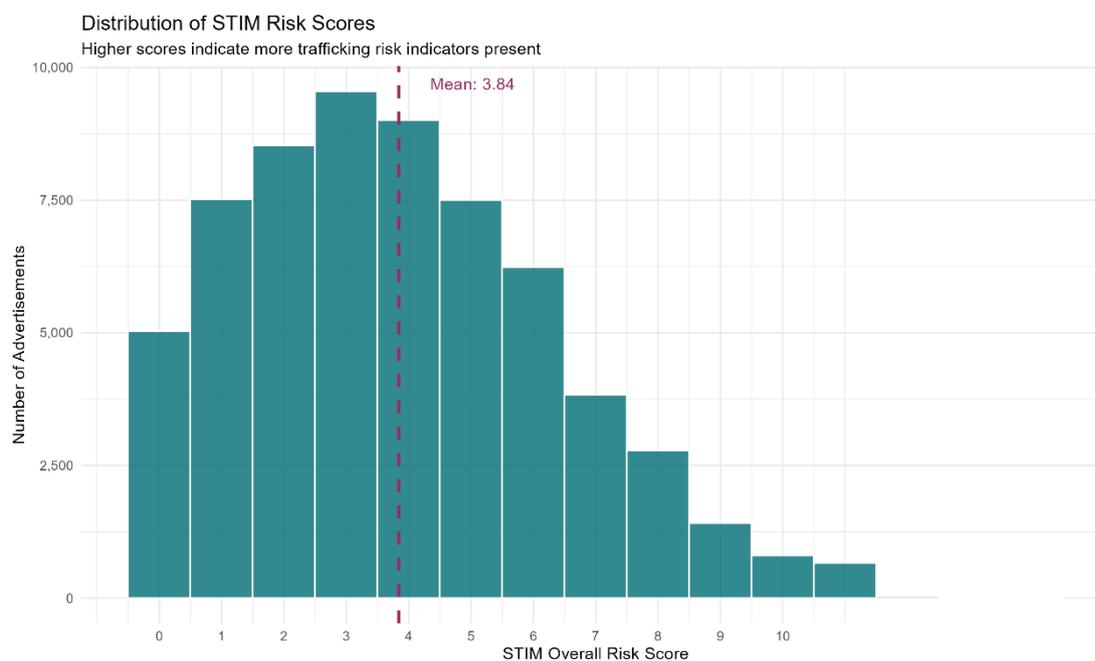
Across the dataset, most advertisements contained at least one of the STIM indicators included in this analysis. This is expected, as some indicators are relatively common within ASW environments, such as references to youth or certain stylistic features of text. The presence of these indicators should not be interpreted as evidence of trafficking. Instead, they signal characteristics that may warrant closer attention or further assessment.

While no single indicator is sufficient to suggest exploitation, advertisements that contain a higher proportion of indicators are more likely to align with patterns associated with trafficking risk. These results should be understood as highlighting areas where vulnerability or coercion may be more prevalent, rather than providing definitive identification of trafficking within individual profiles.

Average STIM scores

The distribution of STIM scores across the dataset shows that the average (mean) score is 3.8. This indicates that, for a typical advertisement, several of the automated STIM indicators were present at the same time.

Figure 1: Distribution of STIM Risk Scores



Multiple risk indicators are present in the majority of listings

The analysis below shows the proportion of listings that contain a specific number of indicators, without taking into account the different weights assigned to each indicator within the STIM framework.

To understand how indicators of trafficking and exploitation appear across online adverts, we examined how many STIM indicators were present in each listing. STIM indicators are practitioner-developed signs that may point to exploitation or third-party control, such as repeated phone numbers across different adverts, identical text across multiple profiles, references to drug use, descriptions such as “new to area”, unusually young ages, or willingness to perform a wide range of sexual services. The presence of multiple indicators in one advert does not prove trafficking, but it does increase the likelihood that exploitation may be occurring.

How the indicators cluster

The table below summarises how many indicators appeared across the dataset: It shows that 59% of adverts have three or more STIM indicators present and 39% have four or more indicators. Only 8% of adverts showed no indicators at all. The vast majority displayed at least one indicator, and most displayed several.

Table 1: Frequency of STIM indicators in the dataset

Number of Indicators	Count	Proportion	Proportion with \geq
0	5,027	8.00%	100.00%
1	9,762	15.50%	92.00%
2	10,804	17.20%	76.50%
3	12,642	20.10%	59.30%
4	11,507	18.30%	39.20%
5	8,130	12.90%	20.90%
6	3,551	5.60%	8.00%
7	1,138	1.80%	2.30%
8	282	0.40%	0.50%
9	53	0.10%	0.10%
10	4	0.00%	0.00%

As well as counting how many STIM indicators appeared in each advert, a weighted version of the scoring system was also applied. In the weighted approach, each indicator is assigned a different value depending on how strongly practitioners consider it linked to trafficking or exploitation. This means indicators that typically signal higher concern contribute more to the overall score than indicators that occur more commonly or are less directly associated with coercion.

Weighting the STIM indicators in this way provides a clearer sense of where the most serious risks may be concentrated. When the weighted scoring was applied across the full dataset, the proportion of adverts showing three or more indicators increased from 59 percent (using simple counts of indicators) to 66.5 percent when adjusting for the severity of the indicators present. This suggests that not only are indicators of exploitation widespread, but that the more serious indicators appear frequently and are clustered across large parts of the online marketplace.

Table 2: Weighted frequency of STIM indicators

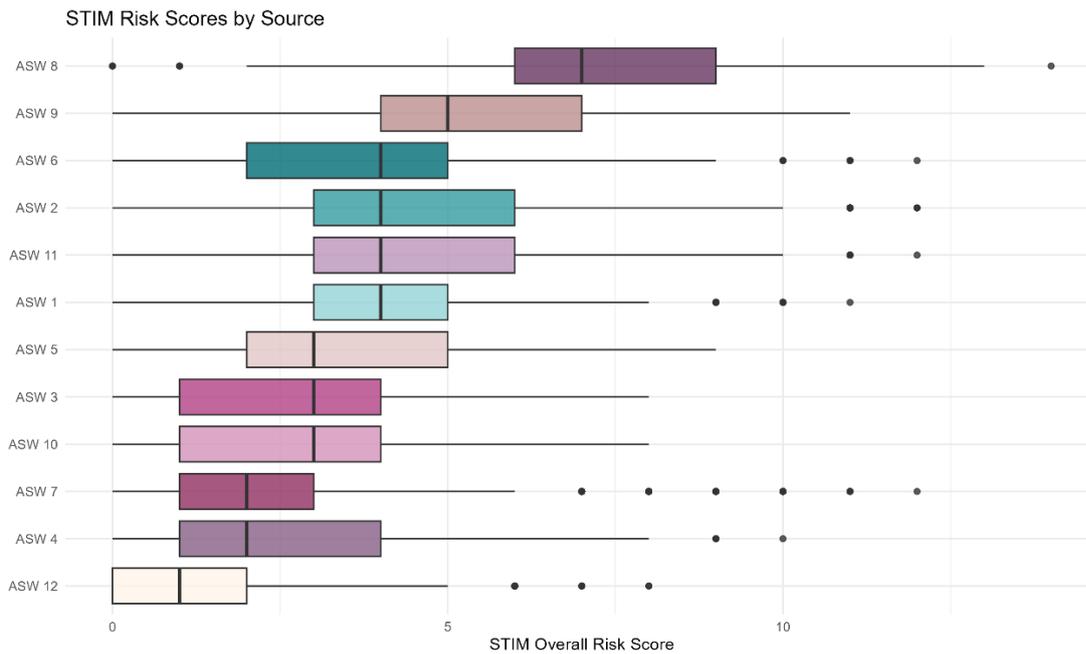
Score Threshold (>=)	Count	Proportion
1	57,873	92.00%
2	50,356	80.10%
3	41,826	66.50%
4	32,276	51.30%
5	23,269	37.00%
6	15,766	25.10%
7	9,528	15.10%
8	5,699	9.10%
9	2,915	4.60%
10	1,502	2.40%
11	699	1.10%
12	39	0.10%
13	2	0.00%
14	1	0.00%

STIM scores by ASW

The chart below shows how overall STIM risk scores differ across the sources included in the analysis. Most sources have scores in a similar range, though some show a wider mix of risk levels than others. A small number of higher-risk scores appear across several sources, suggesting occasional cases with more complex indicators.

It is important to recognise that lower scores on some websites do not necessarily reflect lower trafficking risk overall, as the types of users and advertisements can vary widely between platforms. At the same time, websites with higher average STIM scores may require closer attention, as they could indicate a greater presence of potential trafficking indicators.

Figure 2: Spread of STIM scores by ASW



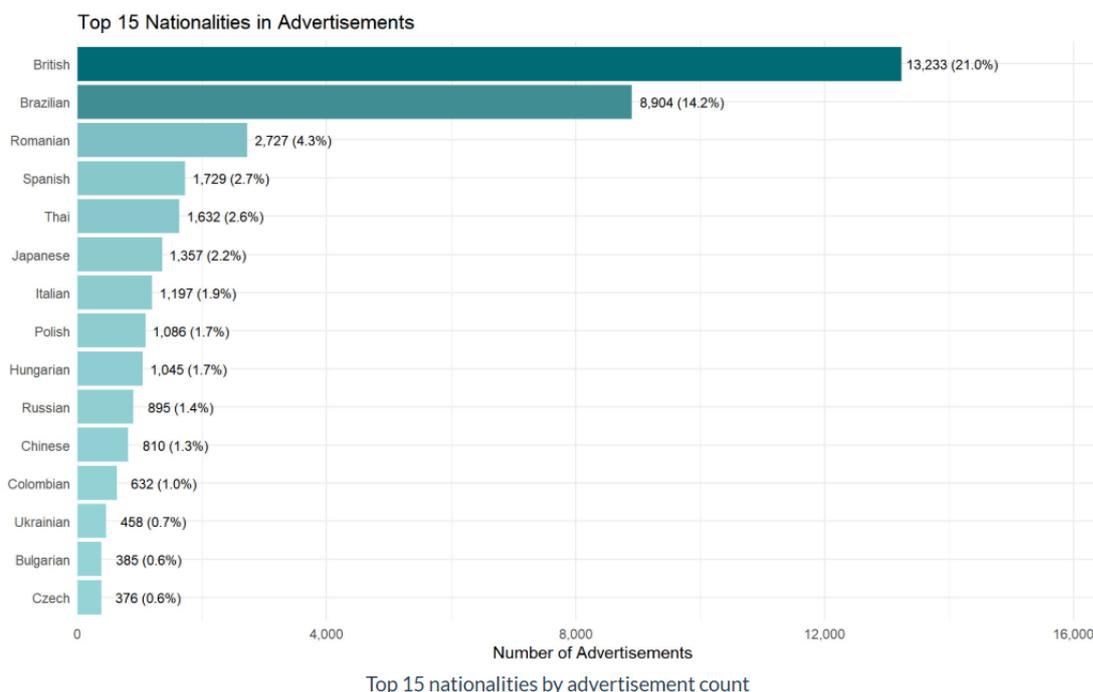
ASW 8 stands out in this comparison, with the highest average STIM score and a wider spread towards higher values. This indicates that, within the dataset analysed, adverts on ASW 8 more often display combinations of the automated indicators associated with elevated trafficking risk. This does not confirm exploitation, but it does suggest that ASW 8 warrants closer analytical attention, alongside consideration of platform differences such as advert categories and posting practices.

Demographics

British, Brazilian and Romanian are the most advertised nationalities on the ASWs examined. The chart below shows the most frequently stated nationalities in the advertisements. British (21%) and Brazilian (14%) nationalities appear most often, making up the largest share of the dataset, followed by Romanian (4%) and Spanish (3%). A wider mix of nationalities is represented in smaller numbers, including Thai, Japanese, Italian, Polish, and several others.

While these figures reflect what is recorded in the advertisements themselves, they do not indicate the actual nationality of individuals or any underlying risk. Instead, they provide a descriptive overview of how nationality is presented within the dataset and highlight the range of nationalities commonly referenced in the advertisements.

Figure 3: Top 15 nationalities advertised on ASWs



Advertised age patterns across ASWs

Across the 62,900 adverts analysed, the ages displayed on ASWs followed a consistent pattern. The weighted average (mean) advertised age was around 25.3 years, reflecting the fact that the largest platforms had the highest volumes of adverts and tended to list younger ages.

Most of the large ASWs showed mean advertised ages between 25 and 26 years, while smaller platforms tended to report higher averages, sometimes above 30. The total range of advertised age was from 18 up to 80 years old. Median ages were slightly lower than the means on almost every site, showing that the distribution is skewed toward younger ages.

Although every site reported a minimum advertised age of 18, survivors in this research emphasised that ages shown on profiles are not always accurate. Some survivors were advertised without their knowledge, had ages altered by third parties, or were listed as older or younger than they actually were.

Overall, the advertised age patterns suggest that the online marketplace strongly concentrates around women in their mid-twenties, with outliers at both ends of the spectrum but very few older ages making up only a small fraction of profiles.

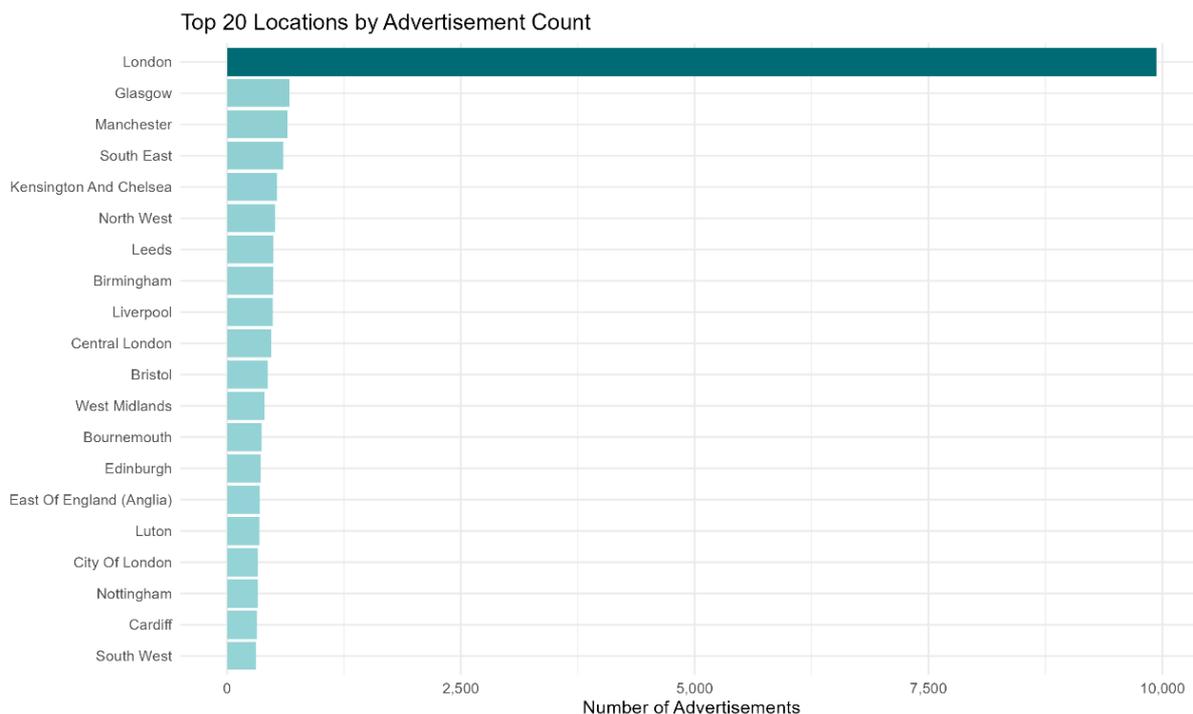
Table 3: Summary of advertised ages by platform

Source	Count	Mean	Median	SD	Min	Max
ASW 7	10064	25.1	21	7.3	18	50
ASW 12	6928	25.9	24	6.3	18	70
ASW 1	16126	25.9	24	5.3	18	60
ASW 8	6220	26.5	26	4.7	18	61
ASW 10	2324	27.4	26	5	18	70
ASW 9	1671	27.8	26	7	18	74
ASW 5	1357	28.1	27	6	18	75
ASW 6	1136	30.5	29	7	18	65
ASW 4	1404	32.7	30	9.5	18	72
ASW 11	8461	33.7	31	9.7	18	80

Geographical location of adverts on ASWs

The chart below shows the locations most frequently listed in the advertisements. London stands out by a significant margin, with far more advertisements than any other area, followed by Glasgow, Manchester, and the South East. A range of other cities and regions appear in much smaller numbers, including Birmingham, Liverpool, Bristol, Edinburgh, and Cardiff. These figures reflect where advertisements were recorded as being based, rather than where individuals were actually located. Overall, the pattern highlights the strong concentration of advertisements in major urban centres, alongside a wide geographical spread across other parts of the UK.

Figure 4: Top 20 geographical locations of adverts on ASWs



Mapping the location of ASW advertisements

The location information recorded in each advertisement was converted into geographic coordinates so that the data could be mapped across the UK.²² This geocoding process enabled the majority of advertisements to be placed on a map with a high level of accuracy. Once the coordinates were created, they were matched to official UK administrative boundaries to allow analysis at regional, county, and constituency levels. These mapped data points were then used to generate heat maps showing where advertisements are most concentrated across the country.

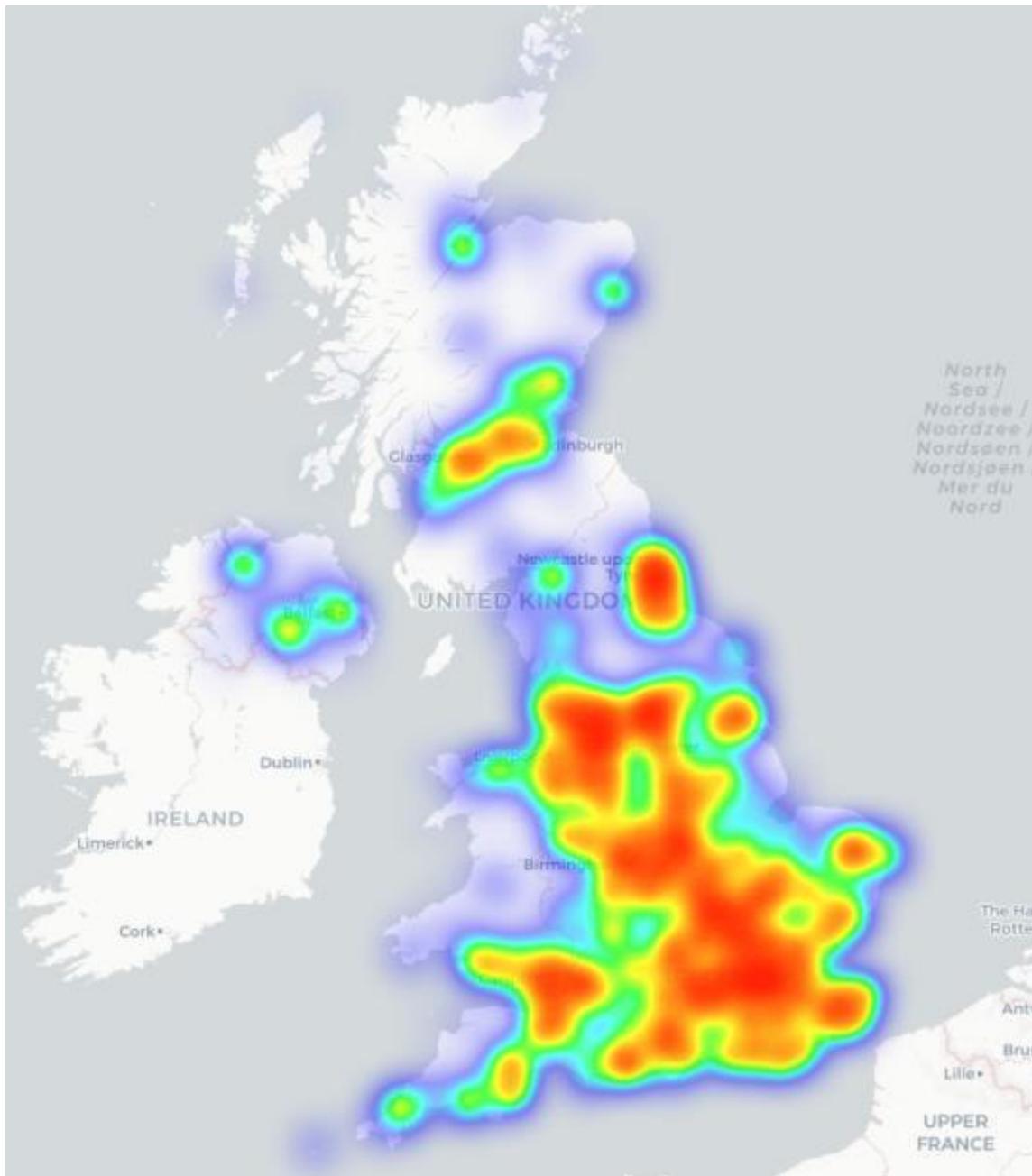
A further set of heat maps applied STIM risk scores as weights, allowing areas with both high advertisement activity and higher risk indicators to be visualised. Together, these spatial outputs provide a clearer picture of how both advertisement volume and potential risk vary across different parts of the UK.

The heat map below illustrates where advertisements on adult services websites are most concentrated across the UK. Areas shown in red and orange represent locations with the highest densities of adverts, with the greatest clustering visible across London, the South East, the Midlands, and parts of the North West. Lower levels of activity, shown in green and blue, appear across other urban centres and

²² The geocoding process converts textual location descriptions (e.g., "London", "Manchester") to specific geographic coordinates. However, many advertisements use broad location descriptions rather than precise addresses. When a location like "London" is geocoded, it is assigned to a single representative coordinate point (typically the city centre, such as Westminster for London). This has two implications: advertisements stating only a broad location are all geocoded to the same central point, artificially inflating the concentration in city centres. Conversely, advertisements from providers in outer areas who list only the broad city name will not appear in their true locations.

along some transport corridors. Much lighter shading in Scotland, Wales, and Northern Ireland indicates smaller numbers of adverts in those regions. Overall, the map highlights a strong south-to-north gradient in advertisement volume, with the most significant concentrations found in major English cities and surrounding areas.

Figure 5: Geographical distribution of ASW adverts across the UK

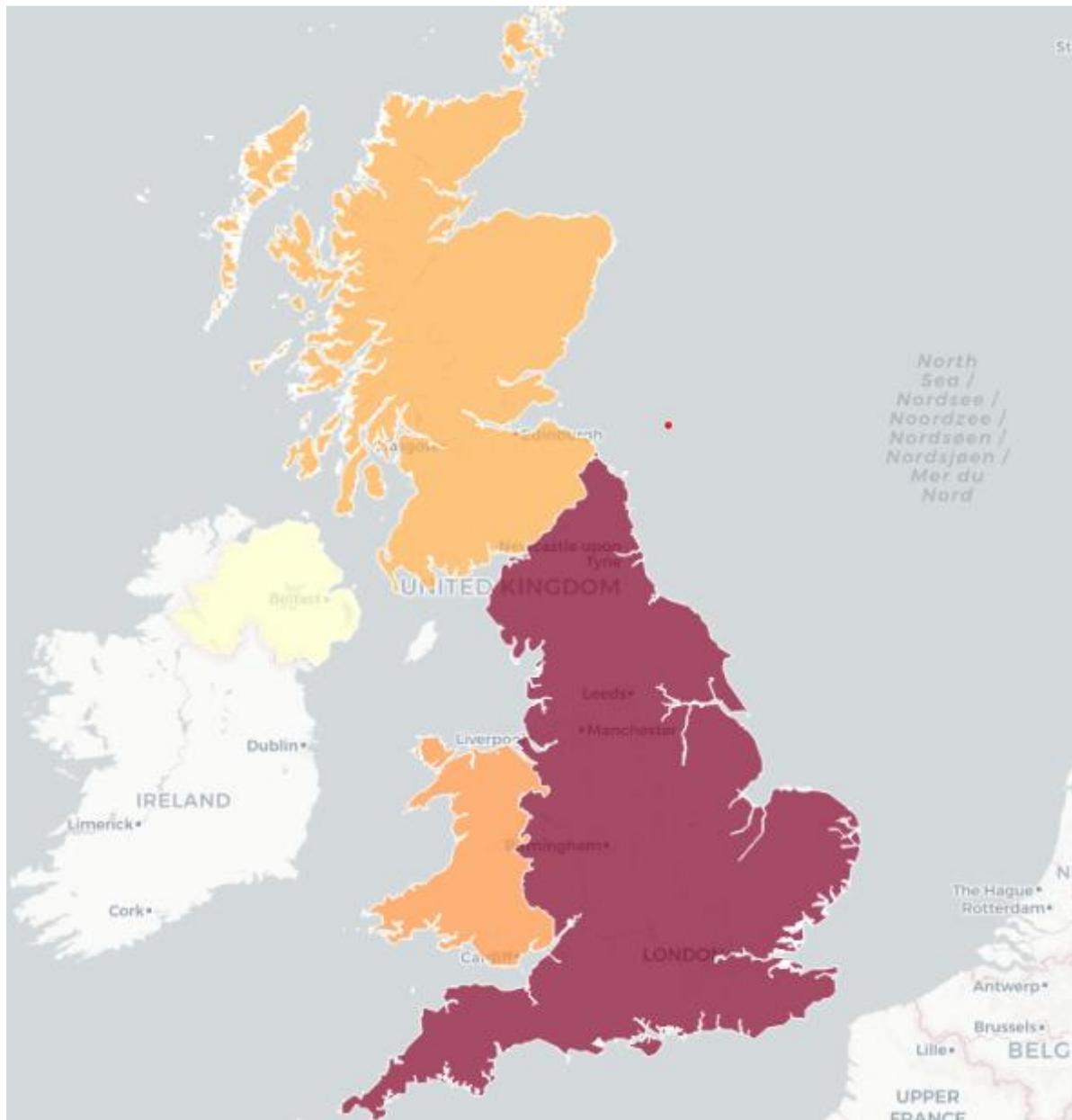


Adverts with high levels of STIM risk factors can be found across the UK, though there are geographical variations.

The following maps show how the average prevalence of automated STIM indicators varies across the UK when viewed at three different geographic levels: country, county, and parliamentary constituency. In each map, darker colours represent areas where advertisements contain a higher mean concentration of the

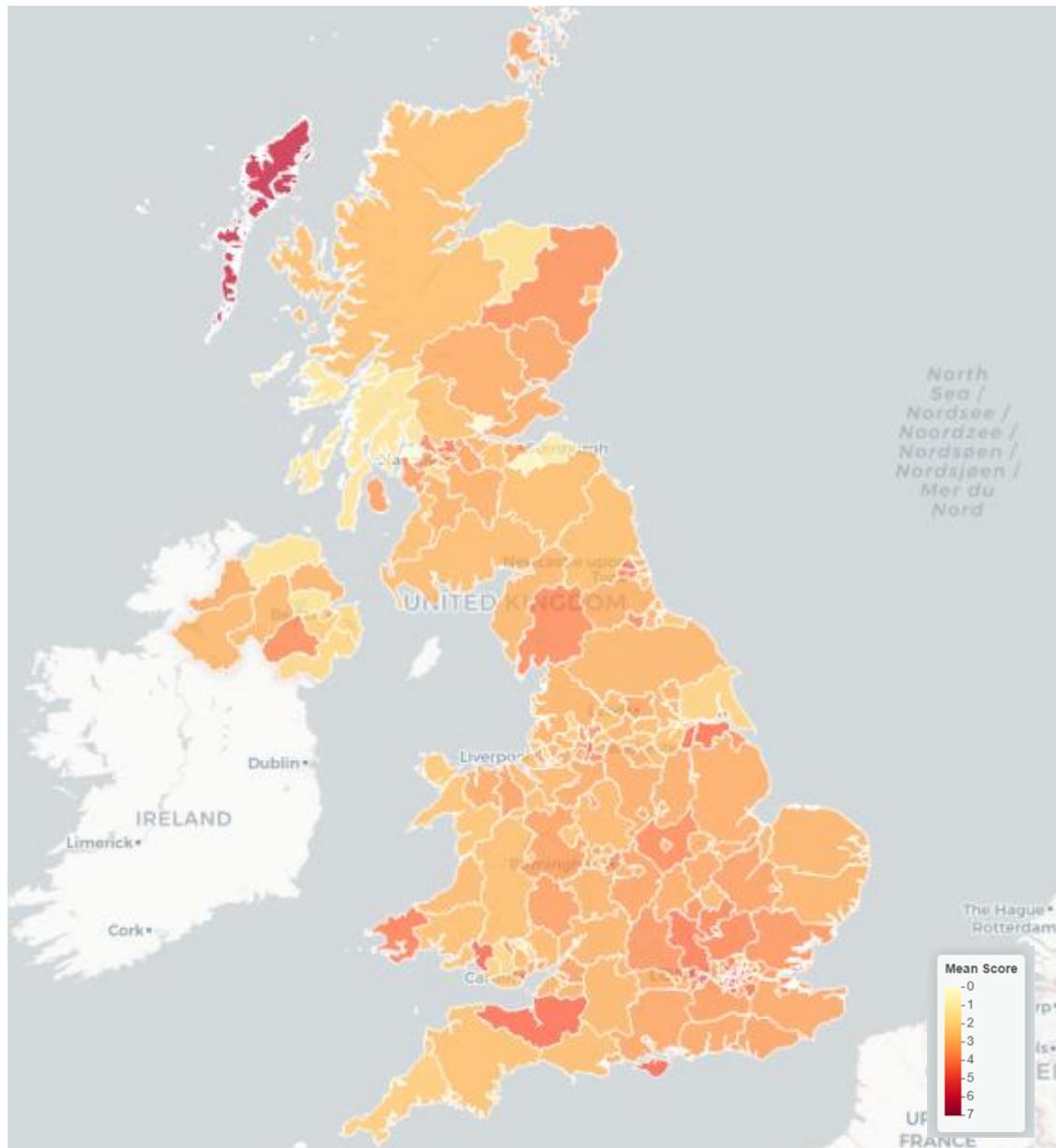
STIM indicators included in this analysis, while lighter colours indicate lower average scores. These shading patterns do not identify exploitation in any individual advertisement. Instead, they provide a comparative way to examine how the indicators captured in the dataset are distributed across different parts of the UK.

Figure 6. Average prevalence of automated STIM indicators across UK countries (Mean Score)



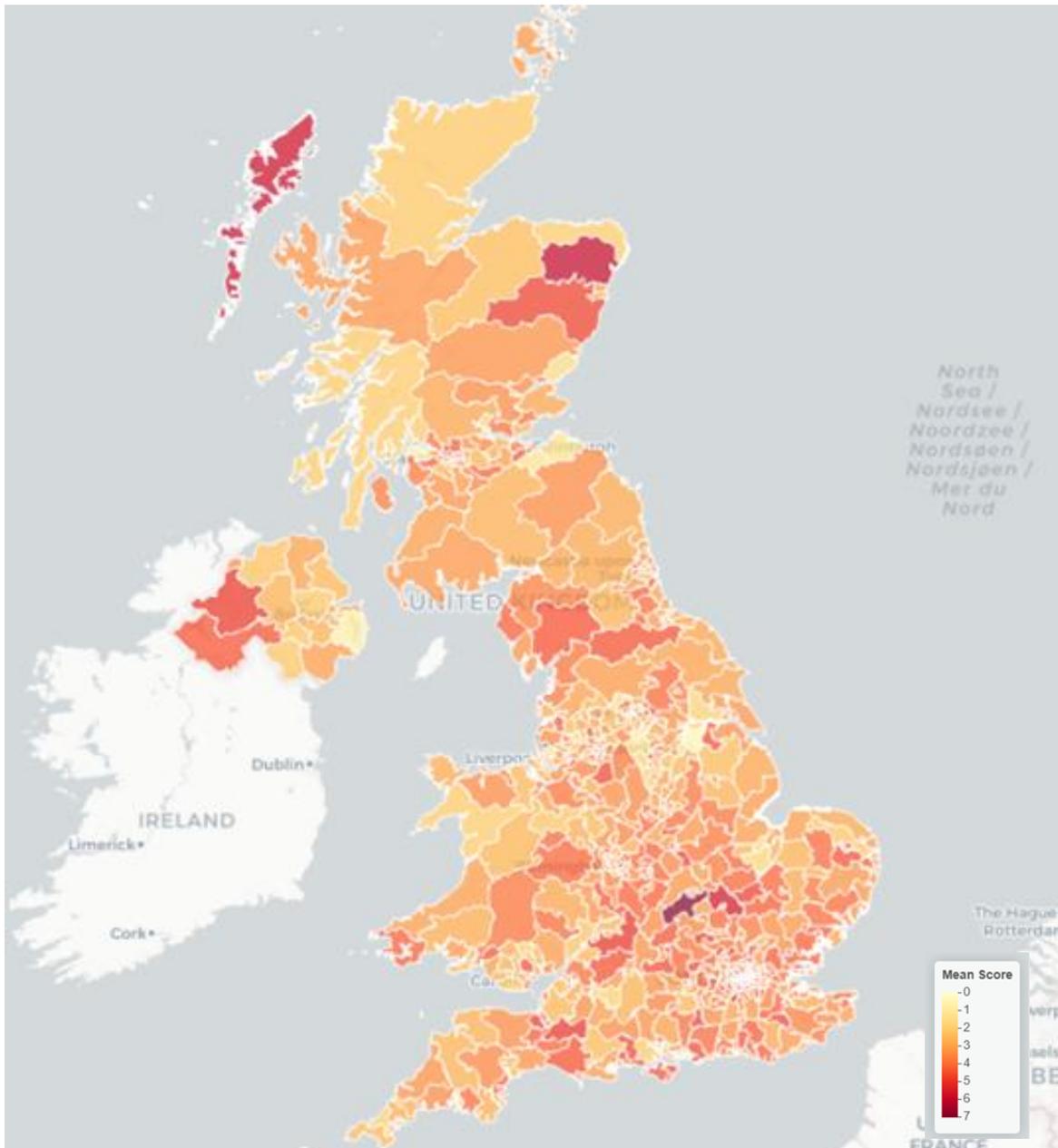
At country level, the mapping suggests that the average prevalence of automated STIM indicators is higher in England than in Scotland, Wales and Northern Ireland. England is shaded more strongly on the mean score map, indicating that advertisements in England contained a higher average concentration of the STIM indicators included in this analysis.

Figure 7. Average prevalence of automated STIM indicators across UK counties



Viewed at county level, the distribution of mean STIM scores shows substantial variation within each nation rather than a single uniform pattern. While many counties fall within a mid-range, there are clear pockets where advertisements contain a higher average concentration of the automated STIM indicators used in this analysis, shown by darker shading. This county level view helps to move beyond national averages by highlighting how elevated indicator profiles can cluster in specific areas alongside neighbouring counties with lower mean scores.

Figure 8. Average prevalence of automated STIM indicators across UK constituencies



The map shows how the average prevalence of STIM indicators varies across parliamentary constituencies in the UK. While higher-scoring areas appear across England, Scotland, Wales, and Northern Ireland, the pattern is not uniform and reflects a mix of urban, rural, and coastal locations.

Conclusions from data analysis

Advertisements and indicators of exploitation are widespread across the UK, and this could be an underestimation

Overall, the analysis provides important evidence about the scale of online advertising on ASWs and the potential risk indicators found within it. The findings show that potential risk indicators are not rare or isolated within the online advertising landscape. Most advertisements contained at least one of the indicators included in this analysis, and it was common for multiple indicators to co-occur within the same listing. This pattern is visible across platforms and across the UK, with advertisement volume concentrated in major urban areas but higher-risk indicators appearing in many locations, not only in the largest cities. At the same time, these results must be interpreted with care. The dataset represents a snapshot captured at a single point in time, and the number of advertisements does not equate to the number of individuals, given potential duplication across sites and the possibility that some listings remain live after they are no longer in use.

It is also important to recognise that this analysis is likely to be conservative in its assessment of risk. Only 16 of the 35 STIM indicators were suitable for automation and macro-level analysis, meaning that several practitioner-led indicators could not be included. Many of the indicators not used rely on close reading, contextual judgement, and image review, all of which are difficult to capture through automated methods. As a result, the level of risk presented here may be underestimated, and some forms of exploitation that would be identifiable to practitioners reviewing individual advertisements may not be visible in this dataset.

This underestimation is also shaped by the fact that the dataset covers only a sample of twelve ASWs, whereas there are likely to be many more ASWs accessible to UK users.

Even with these constraints, the message from the data is clear. Online advertising environments can provide cover for exploitation, and the signals become visible when the market is examined at scale across multiple platforms and geographies. The challenge now is to act on this evidence, using it to strengthen disruption, prioritise safeguarding, and focus attention where risk indicators cluster most strongly, alongside the professional judgement and local intelligence that remain essential for identifying exploitation in individual cases.

Part 3: Legal and Regulatory Frameworks

ASWs and the law

ASWs have become a central component of the UK's commercial sex economy, enabling the advertising of sexual services and facilitating contact between buyers and sellers. Despite their growing prevalence, the legal framework governing these platforms remains fragmented and, in several respects, outdated.

ASWs and legislative inequality

Prostitution is legal in England and Wales; however, many associated activities are criminal offences. Paying for sex and receiving payment for sexual acts are lawful in principle, but both buyers and sellers commit an offence if they solicit in a public place.²³ Women involved in prostitution may face criminal sanction for persistent loitering or soliciting under the Street Offences Act 1959,²⁴ while buyers may be prosecuted under the Sexual Offences Act 2003.²⁵

It is also an offence to pay for the sexual services of a person subjected to force or exploitation.²⁶ Third-party facilitation is partially criminalised through offences such as causing or inciting prostitution for gain and controlling prostitution for gain,²⁷ while brothel-keeping remains unlawful.²⁸

There is currently no clear criminal offence that prohibits commercial websites from knowingly hosting prostitution advertisements or generating profit from them. Whilst offline advertising restrictions exist; equivalent digital prohibitions are largely absent. For example, placing a prostitution advertisement in or near a public telephone is illegal under the Criminal Justice and Police Act 2001, yet no comparable restriction applies to online platforms.²⁹ This inequality illustrates the extent to which legislative frameworks have struggled to adapt to technological change. Individuals directly involved in prostitution may face criminal liability, while platforms that structure and monetise demand often, provided they maintain an indirect and passive role in providing hosting services only, remain outside explicit prohibition.

Several offences could theoretically apply to ASWs depending on their conduct and level of knowledge.

²³ Sexual Offences Act 2003, s.51A (in respect of the buyer). Street Offences Act 1959, s.1 (in respect of the seller).

²⁴ Street Offences Act 1959, s.1.

²⁵ Sexual Offences Act 2003, s.51A.

²⁶ Sexual Offences Act 2003, s.53A.

²⁷ Sexual Offences Act 2003, ss.52–53.

²⁸ Sexual Offences Act 2003, s.55.

²⁹ Criminal Justice and Police Act 2001, s.46.

- **Controlling or inciting prostitution.** Sections 52 and 53 of the Sexual Offences Act 2003 criminalise causing, inciting, or controlling prostitution for gain.³⁰ Platforms that actively market services, organise listings, or derive revenue from advertisements could arguably fall within the spirit of these provisions. However, the offences require offenders to exercise direct control over the exploited individuals, which means it may be difficult to apply these offences to digital intermediaries.

In particular, challenges likely exist in establishing that the digital intermediaries caused (or persuaded) an individual to become prostitutes. For the offences requiring “control”, coercion or force is generally required, and the digital intermediaries’ passive, arms’ length role, means an offence is likely to be difficult to prove.

- **Brothel-keeping.** Keeping or managing a brothel is an offence under the Sexual Offences Act 1956.³¹ Some commentators have suggested that ASWs function as “virtual brothels,” yet existing case law largely limits the definition to physical premises.
- **Human trafficking.** The Modern Slavery Act 2015³² criminalises arranging or facilitating travel with a view to exploitation, regardless of victim consent.³³ Applying this offence to ASWs would require demonstrating knowledge or intent, a high evidential threshold that may constrain enforcement.

Intermediary liability and safe harbour protections

The Electronic Commerce (EC Directive) Regulations 2002 provide online intermediaries with a “safe harbour” defence where they host user-generated content without actual knowledge or awareness of illegality and act swiftly upon notification of the illegal content.³⁴

This protection may not apply if a platform plays an active role in curating or promoting content. Where the ASW plays a more active role, such that the service it provides is no longer of a mere technical, automatic and passive nature (e.g. by actively selecting which profiles are made available on the website, promoting certain profiles or carrying out pre-publication checks that give it knowledge of the illegal content), it may be deemed to have played an active role of a kind that gives it knowledge or control of the content made available on its website, and may not be able to rely on the ‘safe harbour’.³⁵

In this research it appears that most of the ASWs play a passive role in hosting content. We note, however, that some sites appear to require advertisers to submit

³⁰ Sexual Offences Act 2003, ss.52–53

³¹ Sexual Offences Act 1956, s.33A (as amended by Sexual Offences Act 2003, s. 55).

³² And the Human Trafficking and Exploitation (Scotland) Act 2015, and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015

³³ Modern Slavery Act 2015, Part 1

³⁴ Reg 19 Electronic Commerce (EC Directive) Regulations 2002.

³⁵ *Montres Breguet SA v Samsung Electronics Co Ltd* [2023] EWCA Civ 1478

text and photos for pre-publication checks, followed by human moderation after posting. There is an argument that the pre-publication checks constitute a more active role, such that the 'safe harbour' defence will not apply (as it could be difficult for an ASW to demonstrate that it did not have actual knowledge of the illegality of that content where the content was clearly, on its face, illegal).³⁶

Furthermore, certain features, such as paid upgrades and homepage highlights, could be argued to constitute a more active role, to the extent it gives the platform 'actual' knowledge and control depending on the steps the website provider takes to review content it highlights or prioritises.

Nonetheless, the safe harbour framework significantly limits the circumstances in which ASWs can be held liable, reinforcing concerns about regulatory gaps.

The Online Safety Act 2023

The Online Safety Act 2023 (the OSA) represented a major development in the regulation of digital platforms and is the primary mechanism through which ASWs may currently be regulated.³⁷ Websites that advertise adult services fall within the scope of the Act where they enable user-to-user interaction, host user-generated content, provide a search function across multiple websites or databases or publish pornographic content.

Advertising legal adult services is not inherently unlawful. However, under the OSA, regulated platforms must take measures to (i) prevent individuals from encountering illegal content (such as content relating to the causing or inciting of prostitution for gain, controlling prostitution for gain, or sharing of non-consensual intimate images) on their platform, (ii) mitigate the risk of the platform being used for the commission of those illegal offences, and (iii) take down illegal content that they are aware of.³⁸

User-to-user services

Platforms that allow users to upload profiles, share images, or communicate with others are likely to be classified as regulated user-to-user services and are therefore subject to certain duties under the Act.³⁹ These duties include conducting illegal content risk assessments and implementing proportionate safety measures designed to mitigate exposure to illegal or harmful content. Ofcom expects such platforms to maintain robust content moderation processes, accessible reporting mechanisms, and effective age assurance systems (for more risky services where it is likely that children will seek to access the platform).⁴⁰

Enforcement powers under the Online Safety Act

Ofcom possesses substantial enforcement powers where platforms fail to comply with their obligations under the OSA. These include issuing compliance notices,

³⁶ *Montres Breguet SA v Samsung Electronics Co Ltd* [2023] EWCA Civ 1478

³⁷ Online Safety Act 2023.

³⁸ Ofcom (2024) *Protecting People from Illegal Harms Online*.

³⁹ Online Safety Act 2023, user-to-user service provisions.

⁴⁰ Ofcom (2024) *Protecting People from Illegal Harms Online*.

launching formal investigations, and requiring corrective measures.⁴¹ They can impose financial penalties of up to £18 million or 10% of global annual revenue, whichever is greater.⁴² In cases of serious or repeated non-compliance, Ofcom may seek business disruption measures, including blocking access to a service within the UK or requiring search engines and app stores to remove it. Senior managers may also incur criminal liability if they fail to ensure organisational compliance with enforcement actions or information requests.⁴³

These provisions signal a significant shift towards corporate accountability in the digital environment; however, there have been no publicly disclosed investigations specifically targeting ASWs, although Ofcom has begun enforcement activity against services that are subject to separate duties relating to the providers of pornographic content (Part 5 services).

Since January 2025, Ofcom has had a specific enforcement program focussed on protecting children from encountering pornographic content through the use of age assurance. In February 2026, Ofcom fined Kick Online Entertainment S.A £800,000, and 8579 LLC £1,350,000 for failures to implement highly effective age assurance on their services.⁴⁴ In June 2025, the regulator launched an investigation into First Time Videos LLC, operator of pornographic websites including FTVGirls.com, to assess whether highly effective age assurance measures were in place.⁴⁵ Additional investigations on providers of pornographic content have examined platforms such as Scoreland.com and Undress.cc, focusing on compliance with risk assessment duties and safety requirements.⁴⁶

Ofcom's guidance and regulatory approach

Ofcom has confirmed that it has not issued codes of practice specifically tailored to ASWs. Instead, ASWs, to the extent they are regulated user-to-user services, must consider the guidance and codes of practice that Ofcom has published, including the Illegal Content Codes of Practice for User-to-User Services (2025),⁴⁷ which makes it clear that services in scope should have in place functions such as content moderation and user reporting to manage the risk of illegal content on their services.

While the framework categorises adult sexual exploitation, human trafficking and coercive control as illegal harms, there are real challenges for the reporting, assessment and take-down of such content. Where content is reported as suspected to be illegal, providers must either determine whether the content (i) infringes their policies (i.e. whether the content infringes any prohibitions in the website's terms of service on the uploading of illegal content), or (ii) is illegal. If the

⁴¹ Online Safety Act 2023, enforcement powers.

⁴² Ibid

⁴³ Ibid

⁴⁴ Ofcom (2025) Investigation into Kick Online Entertainment SA; Ofcom (2025) Investigation into 8579 LLC.

⁴⁵ Ofcom (2025) Investigation into First Time Videos LLC.

⁴⁶ Ofcom (2025) Investigations into Score Internet Group LLC and Itai Tech Ltd.

⁴⁷ Ofcom (2025) Illegal Content: Codes of Practice for user-to user services. Available [here](#)

website’s policies do not prohibit illegal content, or the type of illegal content that is identified, the provider must decide whether the content is illegal. Where providers are assessing whether content is illegal they can use Ofcom’s Illegal Content Judgement Guidance, which makes references to ASWs and the particular related offences.

Ofcom guidance: Areas of concern

To support ongoing scrutiny of this issue, the table below sets out some areas within Ofcom’s current regulatory approach that may require further examination by Ofcom. These examples highlight where Ofcom’s regulatory approach could be clarified, strengthened or better aligned with the realities of how exploitation operates on ASWs.⁴⁸

Table 4: Ofcom guidance on ASWs: areas for improvement

Issue	Excerpts from Ofcom’s guidance on implementing the Online Safety Act	Why This Is Problematic	Source
Portraying third-party advertising as a safety measure	<i>“The advertising of sex services by a third party can act as a safety measure for some consenting adult sex workers. This may apply to adult sex workers who have difficulty advertising their services themselves; for example, those whose first language is not English or those who do not have access to technology or technical literacy. In such cases, a third party can advertise and risk-assess the clients on the sex worker’s behalf.”</i>	This framing ignores trafficking indicators. Third-party posting for a woman who does not speak English is a recognised trafficking marker. Individuals not in control of adverts may not know what acts are being advertised.	Register of Risks, Protecting people from illegal harms online, Ofcom, 2024, p.205. Link
Minimizing the responsibility of ASWs to identify exploitation	<i>“It is likely to be difficult for service providers to distinguish between content that has been posted on adult service websites by someone that is being controlled for gain and content that has been posted by an independent sex worker.”</i>	Although certainty is impossible, there are well-known exploitation indicators. ASWs have access to information that points to organised control. Guidance risks excusing platforms from due diligence. More emphasis should be put on	Illegal Content Judgements Guidance (ICJG), Protecting people from illegal harms online, Ofcom, 2024, p.154. Link

⁴⁸ These concerns were highlighted to the IASC by the UK charity UK Feminista.

		ASWs to ensure adverts are consensual.	
Inadequate recommendations for how ASWs can use data to monitor for sexual exploitation.	The guidance recommends that ASWs use the Sexual Identification Trafficking Matrix (STIM) tool to help judge whether a prostitution advert is connected to criminal activity and constitutes illegal content under the Online Safety Act.	STIM was created for police without platform data. ASWs hold richer information, including bank details and posting patterns that they could use to automate monitoring to detect sexual exploitation.	Illegal Content Judgements Guidance (ICJG), Protecting people from illegal harms online, Ofcom, 2024, p.154. Link

The need for regulatory focus

The need for systemic application of Ofcom guidelines and a dedicated Ofcom special project on ASWs

While the existence of guidance is a starting point, its effectiveness depends on whether it is applied consistently and systemically across ASWs. The OSA places duties on all in-scope services to assess and mitigate risks of illegal content, but experience across the online safety landscape demonstrates that the existence of these duties alone is insufficient unless supported by active regulatory oversight, targeted monitoring, and dedicated enforcement programmes.

Ofcom has already shown that it can take a proactive, thematic approach to high-risk areas through what it calls “enforcement programmes”. These programmes function as Ofcom’s version of special projects: multi-month regulatory initiatives focused on specific harm types or specific sectors, designed to drive systemic improvement and identify platforms that are failing to meet their duties.

Recent examples of Ofcom’s special-project style programmes include:

- **An enforcement programme into file-sharing and file-storage services** to address the distribution of child sexual abuse material (CSAM) at scale. This programme resulted in two services implementing perceptual hash-matching technology following Ofcom intervention.
- **An enforcement programme monitoring compliance with age-assurance duties in the pornography sector**, opened in January 2025, which led to multiple investigations into services suspected of failing to implement age-verification.
- **A dedicated enforcement programme focusing on whether services are conducting illegal content risk assessments**, including issuing formal information requests and the threat of significant penalties for non-compliance.

These examples illustrate that Ofcom is able to initiate targeted, high-intensity regulatory workstreams when particular contexts pose elevated risk.

Ofcom also has a dedicated “small but risky” Taskforce that has active supervisory engagement through Ofcom. This team focuses on high priority themes in “small but risky” services including offences directed against women and girls. ASWs should be part of this bespoke supervisory oversight.⁴⁹

Given the well-documented links between online prostitution advertising and sexual exploitation, and the fact that ASWs remain structurally vulnerable to the concealment of criminal activity, there is a strong case for Ofcom to develop a dedicated special project focused on ASWs, whether by way of the “small but risky” supervision, an enforcement programme or as part of an expansion of its work on protecting women and girls.⁵⁰

Importantly, making ASWs the subject of a special project would not only strengthen compliance at platform level, it would also make the guidance future-proof. The exploitation patterns on ASWs evolve rapidly: new platforms emerge, cross-border actors change their tactics, and technological affordances shift how adverts are posted, controlled and monetised. A standing enforcement programme would allow Ofcom to update expectations on an iterative basis, ensuring that regulatory oversight keeps pace with the marketplace.

International obligations to reduce demand

ASWs occupy a legally ambiguous position across the UK, although the nature of this ambiguity varies between jurisdictions. In England and Wales, prostitution itself is not unlawful, but a range of associated activities, including brothel keeping, controlling prostitution for gain, and certain forms of solicitation, are criminalised. Despite this partial criminalisation, the digital infrastructures that organise, advertise, and monetise sexual services frequently fall outside the scope of direct regulation, allowing platforms to operate within the law provided they do not cross established thresholds of knowledge or participation in exploitation.

A similar structural tension exists in Northern Ireland, but within a more restrictive legislative environment. Under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, the purchase of sexual services is criminalised, reflecting a demand reduction approach that differs from the legal position in the rest of the UK. However, this prohibition primarily targets individual buyers rather than the online platforms that facilitate commercial sexual encounters.

The UK is bound by several international instruments requiring action to discourage demand for sexual exploitation.

⁴⁹ Ofcom (2024) *Letter from Dame Melanie Dawes to the Secretary of State, 11 September 2024*.

Available [here](#)

⁵⁰ Ofcom (2024) *Statement: Guidance on “A Safer Life Online for Women and Girls”*. Available [here](#)

- The Palermo Protocol requires states to adopt measures to reduce demand that fosters trafficking.⁵¹
- The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) mandates suppression of trafficking and exploitation.⁵²
- The Council of Europe Convention on Action against Trafficking in Human Beings similarly obliges states to discourage demand.⁵³

These commitments raise questions about whether the current regulatory approach sufficiently addresses the role of digital marketplaces in sustaining exploitation. This analysis identifies several regulatory weaknesses:

1. Online advertising remains largely unrestricted, despite limitations on comparable offline practices.
2. Platforms may profit from prostitution without direct criminal liability.
3. Safe harbour protections constrain enforcement unless knowledge can be demonstrated.
4. No bespoke regulatory regime exists for ASWs, despite recognised risks.
5. Demand-side accountability remains limited, potentially undermining international obligations.

Law enforcement responses and prosecution gaps

Despite the UK having one of the most comprehensive legislative frameworks on modern slavery, there remains a persistent and deeply concerning gap between the scale of exploitation identified and the rate at which perpetrators are prosecuted and convicted. Over the past decade, weaknesses in enforcement have undermined the intended impact of the Modern Slavery Act 2015 and limited accountability for offenders.

Prosecution rates are exceptionally low when measured against the number of recorded modern slavery crimes. Using comparable data sets, only around 1.8% to 2% of recorded modern slavery offences result in a charge or summons. This represents a profound justice gap between victim identification and perpetrator accountability. Evidence gathered by the Home Affairs Select Committee (HASC) further illustrated the scale of the enforcement gap. As of July 2023, police forces were managing approximately 4,500 live human trafficking and modern slavery investigations.⁵⁴ Yet in 2022, the Crown Prosecution Service (CPS) received only 286 referrals for trafficking offences, resulting in 405 prosecutions.⁵⁵

The Independent Anti-Slavery Commissioner looked into the *Policing Response to Modern Slavery in the Last 10 Years* which found that modern slavery and human trafficking have been deprioritised within frontline policing structures.⁵⁶ The report highlights inconsistent victim identification, limited specialist expertise across

⁵¹ United Nations (2000) *Protocol to Prevent, Suppress and Punish Trafficking in Persons*, Art. 9.5.

⁵² United Nations (1979) *Convention on the Elimination of All Forms of Discrimination Against Women*, Art. 6; General Recommendation No. 38 (2020).

⁵³ Council of Europe (2005) *Convention on Action against Trafficking in Human Beings*, Art. 6.

⁵⁴ Home Affairs Select Committee, *Human Trafficking* (HC 124, Session 2023–24). [Link](#).

⁵⁵ *Ibid*

⁵⁶ Independent Anti-Slavery Commissioner, *Policing Response to Modern Slavery in the Last 10 Years* (2024). [Link](#)

forces, and the absence of sustained strategic focus. These shortcomings affect the earliest stages of investigation and safeguarding, often preventing cases from progressing. The persistence of these structural weaknesses demonstrates the importance of strong, coordinated national capability.

Concerns about the UK's prosecution record have also been raised by international monitoring bodies, including the Organisation for Security and Co-operation in Europe (OSCE) and the Group of Experts on Action against Trafficking in Human Beings (GRETA), both of which have questioned whether enforcement outcomes are proportionate to the scale of victim identification.⁵⁷ When considered alongside the number of potential victims identified, the disparity is stark. In 2022, 16,938 potential victims were referred into the National Referral Mechanism (NRM), the UK's system for identifying and supporting survivors. Last year this number had risen to 23,411.⁵⁸ These numbers are likely to underestimate the true prevalence of exploitation, as many victims remain hidden or unwilling to engage with authorities.

A key mechanism for delivering such coordination has been the Modern Slavery and Organised Immigration Crime Unit (MSOICU), operating within the National Police Chiefs' Council portfolio. The Unit provided specialist operational support, intelligence coordination, training and national guidance to police forces across England and Wales, aiming to embed an intelligence-led and victim-centred approach. In recent years, the MSOICU has contributed to improved information sharing, capability building and operational coordination. However, following notification from the Home Office, dedicated national policing funding for modern slavery activity will cease after March 2026. The national capability currently delivered through MSOICU will therefore end in its present form when the funding period expires. The removal of coordinated national capacity risks widening the existing enforcement gap still further. Without sustained investment, specialist expertise and proactive disruption strategies the disparity between victim identification and criminal accountability is unlikely to narrow.

The enforcement gap is further compounded by the growing role of digital platforms in facilitating exploitation. The National Crime Agency (NCA) has identified ASWs as significant enablers of trafficking and sexual exploitation, noting that online platforms are increasingly used to advertise victims, manage payments and maintain control.⁵⁹ Despite this recognition, engagement between law enforcement and ASWs remains inconsistent. Research in November 2023 by University of Leicester and Unseen found that while a small minority of platforms proactively share intelligence, most respond only when formally approached, and even then, responsiveness varies. Officers interviewed for the research reported that ASWs often hold extensive data capable of accelerating investigations but typically do not proactively flag suspicious patterns or indicators of exploitation.⁶⁰

⁵⁷ Organisation for Security and Co-operation in Europe (OSCE); GRETA, UK Evaluation Reports.

⁵⁸ National Referral Mechanism Statistics Home Office, [link](#).

⁵⁹ NCA, 2017. National Strategic Assessment of Serious and Organised Crime. [online] Available [here](#)

⁶⁰ Unseen UK (2023) *Adult Services Websites and Modern Slavery: Final Report*. Available [here](#)

How ASWs operate in practice

The law envisages platforms assessing and mitigating risks, implementing effective age assurance, supporting reporting, and preventing illegal content, yet what is visible in practice frequently falls short of these expectations. Many platforms continue to have limited or ineffective ID and age verification for advertisers and browsers, have limited or non-existent moderation or safety reporting and all responsibility is avoided when contact details are shared via adverts and communications move off platform.

The following section sets out how ASWs actually function based on desk-based observation and highlights the gaps between the legal framework and the realities of platform design and user experience.

Age and ID verification for advertisers

There is substantial variation in how identity verification is applied to those advertising sexual services. Some services require advertisers to submit identity documents before publishing an advert. Others link verification only to financial processes, meaning that individuals can create and publish profiles without first confirming their identity, and checks occur only if they later attempt to withdraw earnings.

A number of platforms rely almost entirely on self-declaration. Under these models, the person creating or managing the advert is not necessarily the person depicted. This creates opportunities for third parties to upload photos and information without consent, including in cases of exploitation or coercion. There is also evidence from wider sector practice that adverts can be copied or scraped from one site and reposted elsewhere without the individual's knowledge.

Where no mechanism verifies that the individual appearing in the advert is the same person controlling the account, significant risks arise. These include the advertising of victims by exploiters, use of fraudulent or stolen images, and a lack of accountability for those profiting from the advert.

Age assurance for those browsing ASWs

Age assurance for users browsing ASWs is generally weak and often relies on a simple tick-box confirmation that the user is over 18. In practice, this grants instant access to thousands of explicit adverts with no meaningful barrier preventing children or young people from entering the site.

Some platforms use age-verification tools, but these measures tend not to apply to all content. On several sites, unverified users can still view sexual descriptions, contact details, and instructions for arranging services even if certain images are blurred until age verification is completed. This means children may be able to read

and view sexually explicit material designed for sexual arousal (e.g. pornographic in nature) or initiate contact despite not having passed any age check.

Ofcom's guidance on highly effective age assurance is clear that, for an age assurance process to be deemed as highly effective, it must be technically accurate, robust, reliable and fair. Ofcom has also clarified that self-declaration of age (e.g. asking a user to tick a box to confirm they are 18 or over or asking them to input their date of birth)⁶¹ is not to be regarded as age assurance.

Risks to children and young people

The absence of effective age verification creates a significant safeguarding risk. In some cases, access to adult content required only a single click on an "I am over 18" prompt, after which full browsing was enabled. Once inside, clicking on an advert automatically opened a direct messaging interface, allowing immediate communication with the advertiser without any age or identity assurance.

As a result, children and young people could:

- view explicit sexual adverts
- initiate direct contact with individuals advertising sexual services
- receive unsolicited messages from advertisers or impersonators
- attempt to arrange or purchase sexual services while underage
- enter unmonitored conversations that may escalate to grooming, coercion, or exploitation

The ease with which a child could move from viewing an advert to direct contact represents a major safety failure and exposes young people to significant harm.

Third-party communication channels

Many platforms encourage or enable movement to external messaging apps such as WhatsApp or Telegram. When this occurs automatically or with minimal friction, platform-level safeguards stop applying.

Once conversations move off-platform:

- there is no monitoring of messages
- safety warnings and prompts are no longer visible
- exploiters can operate anonymously
- children may share personal phone numbers
- risks of grooming, sextortion, coercion, and intimidation increase significantly

⁶¹ See paragraphs 3.14 to 3.16 of Ofcom's guidance on highly effective age assurance.

Moderation and safety systems

Moderation practices differ considerably across platforms. Some services describe structured systems that include pre-publication screening, human reviewers, automated tools, and partnerships with safety organisations. Others appear to rely mainly on reactive reporting from users, with limited evidence of proactive detection of high-risk indicators such as repeated phone numbers, inconsistent details across multiple adverts, or signs that profiles may be controlled by third parties.

Across many platforms, visible moderation processes appear more focused on managing advert quality than preventing harm. In particular, some complaints systems are oriented toward buyer concerns such as reporting adverts believed to be fake, misleading, or poor value. These mechanisms prioritise consumer satisfaction rather than safeguarding, and they provide limited routes for reporting suspected exploitation, coercion, or risk to women featured in adverts.

Moderation is typically more focused on advertiser content than on buyer behaviour. No observed platform demonstrated comprehensive monitoring of buyer interactions or messaging. Where users are encouraged to move rapidly to external apps, moderation becomes impossible, and any oversight that does exist effectively ends once contact shifts off-platform.

International approaches to regulating ASWs

International jurisdictions regulate ASWs through a mix of platform liability, demand-side criminalisation and victim-centred support. While legal frameworks differ, a consistent trend is the growing recognition that digital platforms now play a central role in facilitating sexual exploitation, and that regulation must address both online infrastructure and offline harms.

In the United States, FOSTA–SESTA introduced criminal liability for websites that ‘knowingly facilitate’ trafficking, prompting major platforms to remove adult content. However, evidence suggests the law has had limited prosecutorial impact and has displaced activity into less visible online spaces.

France combines criminalisation of sex buyers with penalties for digital facilitation and strong victim-support measures, including reporting duties for internet service providers and exit pathways for exploited individuals.

Germany takes a different approach: buyers can be held criminally liable for negligently purchasing sex from victims, placing indirect pressure on platforms to identify and report suspicious content.

Countries following the Nordic model, such as Sweden, Norway, Iceland, Ireland, Canada and Israel, criminalise purchase while decriminalising those sold. The European Parliament (2014)⁶² echoed this position, recommending the Nordic model as a best-practice framework for EU member states to combat trafficking and gender inequality.

Evaluations in Canada and Israel emphasise the need for platform accountability, including identity verification, proactive content moderation, transparency measures and structured cooperation with law enforcement.⁶³ These lessons demonstrate that demand-reduction alone cannot address the role of ASWs in enabling exploitation.

⁶² European Parliament (2014). Resolution of 26 February 2014 on sexual exploitation and prostitution and its impact on gender equality (2013/2103(INI)). Available [here](#)

⁶³ Office of the Federal Ombudsperson for Victims of Crime, 2022. *Evaluating the Protection of Communities and Exploited Persons Act: Impacts on Sex Workers and Recommendations for Reform*. [pdf] Government of Canada. Available [here](#):

Myers-JDC-Brookdale Institute, 2024. *Evaluation of the Prohibition of the Consumption of Prostitution Services Law: Impact on the Sex Trade and Human Trafficking in Israel*. [pdf] Available [here](#)

Country / Model	Core Legal Approach	Impact on ASWs / Online Platforms	Key Lessons for the UK
United States (FOSTA–SESTA)	Criminal liability for websites facilitating trafficking	Platforms removed adult content; limited prosecutions; activity driven to be less visible	Platform liability alone is insufficient without enforcement and victim-support structures
France	Criminalises purchase; penalises digital facilitation; strong exit support	Requires Internet Service Providers to report illegal content; strengthens penalties for intermediaries	Combine platform regulation with victim support and reporting duties
Germany	Buyer liability for negligent purchase of sex from trafficking victims	Indirect pressure on platforms to detect suspicious content	Liability can incentivise monitoring and reporting mechanisms
Nordic Countries	Criminalise purchase; decriminalise sellers	Reduces visible prostitution but pushes activity online; enforcement challenges persist	Demand-side laws must adapt to digital markets
Canada (PCEPA)	Criminalises purchase and third-party advertising	Review recommends mandatory ID verification and moderation; greater platform accountability	Regulation should be tailored to online exploitation risks
Israel (2024 evaluation)	Criminalises purchase; modernisation of digital enforcement	Recommends transparency reports and cooperation obligations	Due-diligence duties for platforms can strengthen detection and disruption

Conclusions

This report set out to examine how ASWs contribute to sexual exploitation, drawing on survivor testimony, large-scale data analysis, and legal and regulatory review. Taken together, the evidence shows that ASWs provide the infrastructure through which exploitation is initiated, scaled, concealed, and normalised, while current systems across platforms, statutory services, and regulators fail to provide consistent prevention, protection, or accountability.

Survivors described multiple, non-linear pathways into exploitation via ASWs. Entry was rarely a free choice; instead, it was driven by grooming, coercive partners, organised networks, or acute vulnerabilities such as homelessness or domestic abuse. Across these circumstances, ASWs acted as accelerators, making exploitation easier to begin and far harder to escape. Survivors reported severe and long-lasting harms, including loss of autonomy over profiles, earnings, and boundaries; exposure to anonymous buyers; escalating violence; and persistent psychological trauma.

Survivors identified specific ASW design features that enable exploitation: weak verification, third-party control of profiles, buyer anonymity, rapid movement to unmonitored messaging apps, and menus that normalise violence and boundary pushing. Dual-function platforms that mix livestreaming with pathways into offline contact blur online/offline boundaries and facilitate rapid escalation. Some survivors called for an outright ban on ASWs; others emphasised that if platforms remain, major reform is essential.

Data analysis mirrored survivor experiences. Across 12 ASWs, 62,900 adverts were captured at a single point in time, with global traffic reaching 42 million visits in January 2026. While not a count of individuals, this highlights the scale and visibility of the sector. Automated analysis using elements of the Sexual Trafficking Identification Matrix (STIM) found that most adverts contained multiple indicators of exploitation, with an average STIM score of 3.8 and only around 8% showing no indicators. Risk was geographically widespread, with elevated indicators appearing well beyond major cities, suggesting that exploitation is structurally embedded across high-volume advertising environments.

Legal and regulatory assessment revealed a fragmented and ambiguous framework. While prostitution-related offences and trafficking laws could theoretically apply to ASWs, high evidential thresholds and the platforms' distance from direct control make enforcement rare. The Online Safety Act introduces duties relevant to ASWs, but in practice, its effectiveness is uncertain: Ofcom has issued no ASW-specific guidance, leaving platforms regulated by generic illegal-harms rules that do not reflect how exploitation operates. Some guidance risks contradicting survivor evidence, for example by presenting third-party advertising as a possible safety measure.

In reality, safeguarding on ASWs remains weak. Age assurance is minimal, identity checks inconsistent, off-platform movement unmonitored, and moderation often prioritises consumer experience over safety. Enforcement across criminal law, online safety regulation, and intermediary liability remains disjointed. Online advertising for sexual services remains largely unrestricted, even when similar offline practices would be unlawful.

Overall, the findings show that ASWs actively enable sexual exploitation. Survivors' accounts, supported by data and legal analysis, demonstrate that many harms are preventable but persist because platform design, statutory gaps, and outdated regulatory frameworks have not kept pace with online-facilitated exploitation. A more consistent, coordinated, and survivor informed approach is urgently required that strengthens prevention, embeds specialist understanding across services and regulation, and ensures that platforms cannot profit from environments where exploitation is allowed to thrive.

Recommendations

The Government must act to protect women, girls and children.

1. **The Government should launch a formal public consultation on the potential prohibition of these platforms.** While this research has focused primarily on exploitation and trafficking, a consultation should draw on and engage with a broad range of stakeholders to fully assess the legislative inequality which allows digital platforms to facilitate and profit from the selling of sexual services largely within the law which would not be permissible offline. This should include survivors, law enforcement, safeguarding professionals, specialist support services, technology and online safety experts, legal practitioners, academics, regulators, and civil society organisations, as well as groups representing those currently advertised on such sites.
2. **Adult Services Websites should be banned for under 18s.** This would align ASWs with the age verification regime applied to online pornography under Part 5 of the Online Safety Act 2023. It would remove the additional step created by the current requirement for ASWs to self-assess whether they fall into age assurance duties that apply to user-to-user services. All ASWs should be required to use independently audited, highly robust age assurance technologies, and access to direct messaging functions should be blocked until age is verified. This would prevent children viewing adverts or initiating contact.

The regulator must do more to hold Adult Service Websites to account

3. **Ofcom to make compliance with certain “best practice” provisions in its Online Safety Act guidance mandatory for ASWs. Ofcom should revise and strengthen its guidance and the Codes of Practice (as applicable) based on findings from this research, incorporating:**
 - a. Explicit recognition that third party advertising and linked profiles are trafficking indicators, and a legal requirement for ASWs to hold accurate data on account ownership and to prohibit third party management unless it is verified as legitimate and safe. The framing of certain issues relating to sexual exploitation in Ofcom’s Illegal Content Judgements Guidance (ICJG) is problematic and should be updated based on the findings from this research and any additional consultations Ofcom carries out.
 - b. ASWs should be required to take clear responsibility for identifying potential exploitation on their platforms, reporting concerns, and proactively supporting safe exit. Ofcom should require ASWs to use the data they hold to detect indicators of trafficking and control, act on these risks, and implement mandatory reporting mechanisms that provide clear

signposting to specialist support and exit services, allow individuals to challenge non-consensual advertising, and include urgent safeguarding pathways for those at risk. This must include a statutory duty to notify authorities where platforms identify indicators of exploitation, including data derived from payment systems, bank details, IP activity and contact patterns. Ofcom should require evidence of effective detection, reporting and notification systems as part of its compliance audits.

- c. Pending any updates to the law initiated by the Government to introduce a legal requirement that bans under-18s from accessing ASWs (as set out above), Ofcom to make clear the presumption that ASWs are required to implement highly effective age assurance to prevent children from accessing harmful content on those platforms.
- d. A requirement, in the Codes of Practice, for ASWs to establish a trusted flagger programme in partnership with organisations that have expertise in online gender-based harms, including the police and charities with relevant expertise. Giving survivors and victims (and users of these websites) the option to reach out to these organisations to make reports on their behalf could enable swift take down of profiles and help prevent non-consensual advertising. ASWs should also be required to document their response times and the speed at which content is taken down.
- e. A requirement, in the Codes of Practice, for ASWs to implement hash matching to prevent uploads of known intimate image abuse.
- f. Ofcom should designate a “Review of Adult Service Websites” as a formal special project under its online regulatory mandate. A targeted project would allow these risks to be assessed systematically rather than reactively. This should include mapping the adult services website market by identifying key platform types, ownership structures, revenue models, and hosting locations. It should also evaluate the effectiveness of safety measures, including verification and moderation.

There must be more support for survivors of sexual exploitation.

4. **The Government should establish a national programme of trauma-informed support for those who are trying to escape sexual exploitation.** This should include specialist refuges equipped to support individuals escaping pimps, traffickers, and organised crime, long-term psychological support, including complex trauma services, housing stability and financial support, legal, immigration, and benefits advice, survivor-led peer support networks.
5. **All survivors of sexual exploitation should have access to independent advocates to support them in their recovery journey and to navigate the criminal justice system to hold perpetrators to account.** Independent Sexual Violence Advisers (ISVAs) should be available to all victims of sexual

exploitation. Victim Navigators should be available to all victims of sexual exploitation who are in the criminal justice system.

6. **The Government should establish a Survivor Advisory Council to ensure lived-experience expertise is embedded in policy decisions.** Ongoing policy, regulation, and design of support programmes should reflect the realities of those who have lived through ASW-facilitated exploitation.

Law enforcement must do more to tackle exploitation and catch the perpetrators of these horrendous crimes

7. **The Government must introduce a new Modern Slavery Strategy** that sets clear priorities for policing, strengthens coordination across agencies, and reflects the online nature of exploitation. The previous Modern Slavery Strategy is over a decade old; a new one is needed to make it clear that ending trafficking is a clear priority for this Government. As part of this renewed strategic commitment, **the Government should also reverse its decision to withdraw national modern slavery policing funding beyond March 2026.** The Modern Slavery and Organised Immigration Crime Unit is the national specialist capability that supports police forces by coordinating intelligence, strengthening investigations and improving victim safeguarding. The ending of its dedicated budget will dismantle the only coordinated national structure focused on these functions. Reinstating this funding is essential to maintain national consistency, preserve specialist expertise, and ensure the system can respond effectively to online enabled sexual exploitation.
8. **Encourage early cooperation between CPS and police colleagues:** Enhance CPS-police collaboration by improving early advice processes, promoting consistent charging decisions, and ensuring investigations involving exploitation via ASWs receive specialist scrutiny and support. Ensure that policing and prosecution partners have the national coordination, consistent practice, and victim-centred tools needed to identify exploitation, build strong cases, and deliver justice for victims while disrupting perpetrators who use ASWs for human trafficking and sexual exploitation.
9. **Training should be rolled out across law enforcement on how to support and interact with victims of sexual exploitation.** Recognising the signs of coercive control requires looking beyond what is immediately presented. National training on recognising digital coercion and online-facilitated sexual exploitation should be provided. Training must ensure frontline officers understand indicators of control within ASW profiles, third-party advertising, and the dynamics of online exploitation described in this report.
10. **Sustain and strengthen national digital and data-driven investigative capacity.** Police must be resourced to carry out technology-enabled investigations, including advanced analysis of ASW advertising patterns, digital forensics, cryptocurrency tracing, and intelligence mapping of organised crime operating online.

Annex A: How they operate

What is an Adult Services Website (ASW)

The term ASW is used to refer to any online platform that allows individuals or third parties to post, advertise, facilitate, or broker sexual services in exchange for money, goods, services, or other benefits.

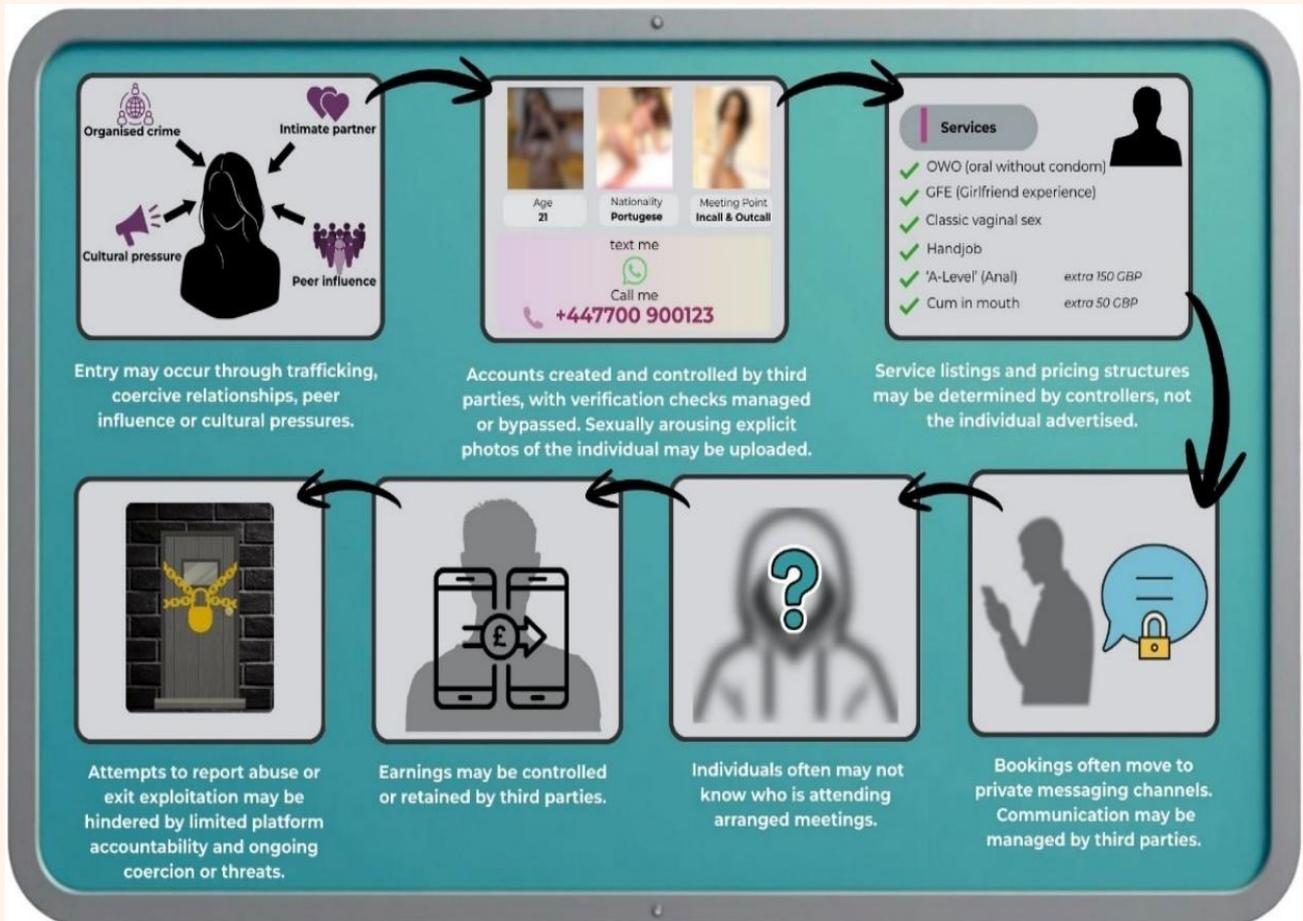
How they operate

Example of 'buying' process

Note: These process charts are for illustrative purposes only and do not include real profiles or contact information



Behind the profile: where exploitation can occur



Annex B: Methodology

This research used a multi-strand methodology combining survivor interviews, large scale online data analysis, and legal review to understand how Adult Services Websites may facilitate sexual exploitation and trafficking in the UK.

1. Survivor interviews

The research began with qualitative interviews with individuals who had lived experience of sexual exploitation facilitated through Adult Services Websites. Twelve participants were recruited through specialist support organisations. Semi-structured, trauma-informed interviews enabled participants to describe their experiences in their own words. Transcripts were anonymised and analysed using inductive thematic coding to identify recurring patterns in grooming, third party control, loss of autonomy, platform design features, safety risks, barriers to exit or help seeking, and recommendations for tackling exploitation online. Insights from survivors informed the analytical focus of the wider study. Throughout this report survivor voice is included as quotes.

2. Collection and analysis of online advertising data

In January 2026, the research team collected 62,900 publicly accessible adverts of women from a sample of twelve Adult Services Websites operating in the UK and cleaned, standardised, and combined them into a unified dataset. This enabled consistent comparison across platforms and allowed structural patterns to be identified. Sixteen indicators from the Sexual Trafficking Identification Matrix (STIM) were applied to this dataset to detect adverts showing indicators linked to potential exploitation such as repeated contact details, restricted movement, or signs of third-party control. Geospatial mapping was then used to plot the distribution of advertisements and the mean score of indicators present across the UK, helping to identify regional concentrations of potential concern.

3. Legal and regulatory analysis

A legal review was undertaken to assess how the Online Safety Act 2023, the Sexual Offences Act 2003, the Modern Slavery Act 2015, financial crime legislation, and related frameworks apply to Adult Services Websites. This analysis examined current duties placed on platforms, identified gaps or inconsistencies in regulation, and considered whether existing legal tools are sufficient to address exploitation facilitated through online advertising.