

The Northern Ireland Assembly All-Party Group
on Modern Slavery and Commercial
Sexual Exploitation

INQUIRY REPORT

Hidden in plain sight

*How websites advertising prostitution facilitate sexual
exploitation in Northern Ireland*

October 2026

The All-Party Group (APG) on Modern Slavery and Commercial Sexual Exploitation was established to ensure that Northern Ireland is properly equipped by providing insight and evidence on the problems of modern slavery and sexual exploitation, and to work to eradicate trafficking and sexual exploitation in Northern Ireland.

The APG prioritises survivors, ensuring they have a voice in the Assembly and access to the help and support they need.

All-Party Groups provide a forum in which MLAs and outside organisations and individuals can meet to discuss shared interests in a particular cause or subject.

This Inquiry Report is based on written and oral evidence received by the APG, as well as the APG's own research.

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Forewords



Peter Martin MLA
CHAIR

This Inquiry set out to understand how technology has reshaped commercial sexual exploitation in Northern Ireland. The scale of what we found exceeded what many of us had feared. Websites advertising prostitution have become the shop window for a trade that makes a profit from selling people here in Northern Ireland.

Having carefully considered all the oral and written evidence we received from survivors, researchers, police officers, and the platforms themselves, we concluded that these websites provide the infrastructure through which exploitation is organised, scaled, and concealed. We have not shied from setting that conclusion out plainly, nor from acknowledging where the evidence before us was contested or incomplete. This is a conclusion we arrived at when balancing all the evidence presented to us.

I want to record my gratitude to the survivors who gave evidence to this Inquiry, often at considerable personal cost, and to the researchers, police officers, and organisations who gave freely of their time and expertise. Their testimony forms the backbone of this report's findings and recommendations; it is the evidence that we received that led to the conclusion that there must be an outright ban on websites advertising prostitution and that better support must be put in place to help those seeking to leave prostitution.

I also thank my colleagues on the All-Party Group for their diligence and their willingness to follow the evidence, even where it led to uncomfortable conclusions. This is not a report that offers easy answers, but I hope that it is an honest one.

We now put these findings and recommendations to the Assembly, the Executive, and Westminster, in the expectation that they will be met, not with further deliberation, but with firm and clear action.



Connie Egan MLA
DEPUTY CHAIR

Much of the evidence that has been received by the Inquiry has been difficult to listen to and read. The evidence we received directly from survivors was particularly powerful. One survivor told us that, after being advertised online, she felt she no longer had control over her own body; she did not know if she would eat, sleep or even be safe at night. It is the courage of these women in sharing their experiences that makes this report so important.

This Inquiry report is built on evidence, but behind every submission and piece of data contained in this report is a person. We owe it to the people behind the STIM indicators, every woman who is advertised today in Belfast as ‘new in town’, every girl trafficked across this island against her will, to ensure that this report is not simply read, noted and shelved. We owe it to the people behind the statistics to ensure that this report leads to action.

I am proud of what this Inquiry has produced, and prouder still of the courage it took for survivors to speak up and have their voices heard. I hope that people who have suffered trauma through being advertised online, and those who continue to face exploitation on a daily basis, will see in our conclusions and in our recommendations that we listened and understood that what was being asked of us was not sympathy, but action.

My thanks go to every witness who trusted this APG with their story, the many organisations that took time to provide evidence, my fellow Members for the seriousness with which they treated this work, and to the Chair for steering us through evidence that was, at times, genuinely hard to sit with.

It is now time for action to end the exploitation of women and girls online.

Executive Summary

This Inquiry was established to review the prevalence and harm of websites advertising prostitution in Northern Ireland.

The APG received written evidence from fifteen organisations and took oral evidence from six individuals and organisations. The Inquiry conducted its own research, and data was collected and analysed from the four main websites advertising prostitution operating in Northern Ireland. The data was collected over a five-week period in April and May 2026, and scrutinised using the Sexual Trafficking Identification Matrix (STIM). Evidence of the impact of websites advertising prostitution in England, Wales, Scotland and the Republic of Ireland was also reviewed.

Having considered all the written and oral evidence received, alongside international studies, parliamentary reports and All-Party Committee reports across the UK, the Inquiry recommends that **websites advertising prostitution should be banned throughout the UK and Ireland.**

The Inquiry concludes that, while websites advertising prostitution do not themselves advertise people and often refer concerning advertisements to the Police Service of Northern Ireland (PSNI), they nevertheless facilitate trafficking and exploitation. Regulation alone will not eliminate exploitation from these platforms. It is the view of the Inquiry that traffickers and other organised criminal groups will continue to use regulated platforms to exploit vulnerable people. This is why banning the platforms outright is the only way to curb the sexual exploitation they facilitate online.

The APG has made the following recommendations:

- 1 Introduce criminal offences targeting those who profit from and operate websites advertising prostitution.
- 2 Improve cross-border operational cooperation with the Republic of Ireland.
- 3 Introduce Sex Trafficking Risk Orders (STROs).
- 4 Amend the Online Safety Act 2023 to regulate websites advertising prostitution and ensure a ban can be enforced across the UK.
- 5 An updated, properly funded strategy for leaving prostitution to be published by the Department of Health that provides proper support for those wanting to leave prostitution and specifically addresses exploitation online, including individual advocacy support to help victims navigate the criminal justice system.
- 6 The Department of Justice to assess if a statutory disregard scheme for those convicted of the offence of loitering and soliciting for the purposes of prostitution is needed for Northern Ireland and, if appropriate, bring forward proposals to ensure people are not hindered by past convictions.
- 7 Targeted interventions for men and boys that challenge attitudes underpinning the purchase of sex and promote respectful, equitable and healthy relationships.
- 8 Mandatory training for frontline police and support agencies to ensure the most up-to-date investigatory techniques are employed to combat trafficking for sexual exploitation.

This report contains challenging evidence and language. Many of the issues considered will be upsetting for some and discretion is advised when reading the report.

Introduction

Trafficking and Sexual Exploitation: A Global Problem

Human trafficking has become a serious global human rights crisis, and the sexual exploitation of women and girls sits at its centre. UNODC's latest Global Report on Trafficking, published in 2024, recorded that between 2019 and 2022 there was a 25% increase in detected trafficking victims globally, with the number of child victims increasing by 31%.¹

Women and girls continue to account for the majority of victims detected worldwide: an estimated 71% of victims are women.² While the majority of people trafficked (men and women) are subjected to forced labour, women and girls are overwhelmingly trafficked for sexual exploitation, with almost two-thirds of women trafficked for this purpose. On the island of Ireland, the problem is catastrophic: 95% of women and girls trafficked to this island are brought for the purpose of sexual exploitation.³

Trafficking has exploded as a global crime wave due to the profit it generates. Victims of trafficking for sexual exploitation are financially lucrative 'commodities' for criminal trafficking gangs. An economy has been created that treats human beings as property to be traded. In its report Profits and Poverty, the International Labour Organization found that criminal gangs have made \$236 billion (£171 billion) between 2014 and 2024 from their exploitation of people, with almost three-quarters of that profit earned through the commercial sexual exploitation of women and girls. A person forced into sexual exploitation generates an average of \$27,252 a year for those exploiting them, compared with \$3,687 for a person subjected to forced labour.⁴ The International Labour Organization states:

*"in most cases people in forced commercial sexual exploitation are paid very little or nothing at all. In some reported cases, victims are denied payment because they must pay off a debt to their trafficker ostensibly incurred as a result of having been trafficked. They may incur new debt when they are passed into the hands of other traffickers. Deductions for food, clothing, rent, alcohol, or exorbitant interest charges are among the other pretexts used by perpetrators for non-payment of victims. At the same time, the fact that commercial sexual exploitation is illegal in most countries means that victims have limited or no recourse to justice."*⁵

The Digital Transformation of Sexual Exploitation

The rise in profits derived by criminal gangs from sexual exploitation has been ‘turbo-charged’ by global digital transformation. The Organization for Security and Co-operation in Europe (OSCE) is clear that, unlike forced labour trafficking, online platforms that enable criminals to advertise women and girls to sex buyers fuel profits and are central to a criminal gang’s business model of maximising profit from trafficking people for sexual exploitation.⁶ In its report mapping online risks, the OSCE states:

“Criminals misuse technology during all the stages of the human trafficking crime. One of the most frequent examples is the use of online platforms to advertise victims of trafficking for sexual exploitation at scale. Traffickers advertise victims on a variety of platforms, but the most commonly used are websites offering sexual services, escort services, and massage services, as well as broader ‘classifieds’ advertising platforms, advertising aggregators, hobby boards, and sugar daddy sites.”⁷

The use of digital platforms allows traffickers to expose victims to a far broader customer base, enabling exploitation at a scale that street-based pimping could not facilitate. Websites advertising prostitution are not bystanders to this trade; they are its shop window, its infrastructure, and in many cases its beneficiaries.

Our Inquiry set out to address three main questions (see Appendix 2):

1. *Do these platforms operate and profit from exploitation in Northern Ireland?*
2. *What is the scale and nature of the harm caused in Northern Ireland?*
3. *Where are the gaps in our legal and regulatory framework?*

What is a Website Advertising Prostitution?

Finding language to describe digital platforms that advertise prostitution is not neutral. In writing this Inquiry report, the APG has selected the term ‘websites advertising prostitution’. In many Government and NGO reports, the term “*Adult Services Websites*” has been used, and is the term most widely used by digital platforms hosting adverts for online solicitation. However, the term encompasses a broader range of commercial sexual content, including dating profiles and both free and paid-for pornographic content. Using this term may deflect from the core terms of reference of the Inquiry, which is focused on the specific activity of soliciting paid sexual acts online. Many platforms that offer sexual services also advertise other goods and services.

Conversely, the term “*pimping websites*”, which is preferred by campaigning groups, carries strong pejorative and criminal connotations that presuppose third-party control, coercion and criminal activity.

While the APG concludes that platforms are not neutral actors in commercial sexual exploitation, we have chosen the term ‘websites advertising prostitution’ because it best describes the platforms within the Inquiry’s terms of reference. It also allows the APG to focus on platforms that offer in-person contact, as understood by the Sexual Offences (Northern Ireland) Order 2008.

Platforms such as OnlyFans, which offer bespoke sexual content and camming, fall outside the scope of this Inquiry, although the APG does have concerns with how those platforms function.

How Websites Advertising Prostitution Function

The platforms examined in this Inquiry are websites which mostly charge a fee for every advertisement placed. These platforms are publicly available, and sex buyers can go to the site, select a person they wish to purchase, and make contact by the means advertised to secure a booking. Typically, a meeting arranged through a website will cost around £70 for 30 minutes, although some women may be priced at much higher or lower rates, depending on the person and platform. Contact is usually made by telephone but can also be brokered through a messaging platform such as WhatsApp or Telegram. Some platforms offer their own messaging service for initial contact to take place.

Although there are sites available in Northern Ireland on which it is free to advertise, the majority of sites available here charge a fee of up to £385 per ad for one month, with options to upgrade the advertisement and boost engagement.⁸ The standard post on websites advertising prostitution includes images of the individual, the services they offer and associated prices.⁹

Websites Advertising Prostitution: Concerns They Fuel Exploitation

Over the past decade, there has been growing concern that websites advertising prostitution are causing and facilitating harm, leading to calls for the platforms to be banned. Others argue that regulation is the better approach, maintaining that these sites perform an important function for law enforcement and provide safety for those choosing to sell sexual services.

The Scottish Parliament and various committees in Westminster have published their own inquiries and reports on websites advertising prostitution. The Independent Anti-Slavery Commissioner (IASC) published her report in February 2026. While the IASC report has helpfully examined data from platforms accessed in Northern Ireland and engaged with our unique legislative framework, the APG believed it was important that the particular circumstances of Northern Ireland were examined more fully, particularly when any recommendations may require all-island regulation and legal intervention, as well as regulation from Westminster.

As this Inquiry report sets out, criminal justice is devolved to Stormont, and there are actions the Northern Ireland Assembly can take independently. However, these must sit within a wider regulatory framework spanning the UK and Ireland. This report builds on the work of colleagues across these islands and brings Northern Ireland's unique circumstances into the wider debate. It aims to strengthen regulation and criminal sanctions against trafficking for sexual exploitation across the Common Travel Area.

CHAPTER 1

The Legal and Regulatory Framework Governing Websites Advertising Prostitution in the UK and Ireland

The law in Northern Ireland

Northern Ireland has adopted a different legal approach to the rest of the UK on the regulation of prostitution. In 2015, the Assembly passed the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, which introduced the so-called Nordic Model to Northern Ireland.¹⁰ The Nordic Model seeks to reduce commercial sexual exploitation by criminalising the purchase of sexual services, while decriminalising those who sell sexual services and supporting those wishing to exit prostitution. The underlying objective is to reduce demand for prostitution and, in turn, reduce sexual exploitation and human trafficking.¹¹

Since the introduction of the 2015 Act, however, the organisation of prostitution has changed significantly. Whereas prostitution was once associated primarily with street solicitation and newspaper advertisements, it is now predominantly advertised and arranged online through websites advertising prostitution. These platforms have become the principal means through which buyers locate and purchase sexual services, raising legal and regulatory questions that were not envisaged when much of Northern Ireland's legislative framework was introduced.¹²

While some of the main websites advertising prostitution operating today were launched in the 1990s, it is only in the last decade that they have become the dominant means through which prostitution is advertised. For example, in Merseyside, Changing Lives found 186 advertisements in a 2023 snapshot of websites advertising prostitution, compared with 1,559 in March 2025—an increase of around 738%.¹³ This rise in the number of advertisements is also observable in Belfast.¹⁴

Section 15 of the 2015 Act created the offence of paying for the sexual services of another person, making Northern Ireland the first jurisdiction in the United Kingdom or Ireland to adopt the Nordic Model.¹⁵ The Act operates alongside existing offences contained in the Sexual Offences (Northern Ireland) Order 2008. These include causing or inciting prostitution for gain (Article 62), controlling prostitution for gain (Article 63), and keeping or managing a brothel (Article 64). In addition, Section 2 of the 2015 Act criminalises human trafficking for all forms of exploitation, including

sexual exploitation.¹⁶ Together, these provisions form the principal legislative framework governing prostitution and commercial sexual exploitation in Northern Ireland.

In evidence to the Inquiry, Dr Gillian Kane and Emma Richmond of Ulster University raised concerns about the definition of human trafficking in Northern Ireland. Under international law, trafficking does not require the physical movement of a victim; recruitment or harbouring for the purpose of exploitation can be sufficient. By contrast, section 2 of the 2015 Act requires a person to arrange or facilitate another person's travel. The authors argued that this may make the existing offence difficult to apply where exploitation is facilitated online without significant movement of the victim. However, the BBC documentary *Caitlin Hanna: Trafficked in Belfast* highlights that successful prosecutions for trafficking can be brought in Northern Ireland where the victim was trafficked within Belfast.¹⁷

Despite changes in Northern Ireland's prostitution laws, there is still no offence specifically prohibiting the publication of any advertisements for prostitution online or the operation of websites that facilitate or profit from the advertising of prostitution. While existing criminal offences may apply where an individual knowingly facilitates prostitution or human trafficking, the law was largely written before these websites became widely used.¹⁸

Existing offences may, in certain circumstances, apply to the operators of websites advertising prostitution, depending on the facts of a particular case. In Northern Ireland, Articles 62 and 63 of the Sexual Offences (Northern Ireland) Order 2008 criminalise causing, inciting or controlling prostitution for gain. However, these offences generally require evidence that a perpetrator exercised control over another person's prostitution, making them difficult to apply to website operators acting as digital intermediaries rather than directly managing those involved in prostitution.¹⁹

Similarly, Article 64 makes it an offence to keep or manage a brothel. While some have argued that websites advertising prostitution operate as 'virtual brothels' by facilitating prostitution online, the offence has traditionally been interpreted as applying to physical premises rather than digital platforms.²⁰

Human trafficking legislation may also apply where a website knowingly facilitates trafficking or exploitation.²¹ However, applying these offences to online platforms would generally require evidence that the operator knew of, or intended to facilitate, the trafficking activity, creating a high evidential threshold for enforcement.²²

The IASC concluded that these limitations have created a significant gap in the current legal framework. In her 2026 report on 'adult services websites', she observed:

“There is currently no clear criminal offence that prohibits commercial websites from knowingly hosting prostitution advertisements or generating profit from them. [In England and Wales] offline advertising restrictions exist; equivalent digital prohibitions are largely absent...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.”²³

Telecommunications, and therefore regulation of the internet, is a reserved matter for which Westminster has responsibility. The principal legislation regulating online platforms across the UK is the Online Safety Act 2023. It requires platforms to prevent users from encountering illegal content, reduce the risk of their services being used to facilitate criminal offences, and remove illegal content when they become aware of it.²⁴

Ofcom, in its written evidence to the Inquiry, advised that websites advertising prostitution may already fall within the scope of the Online Safety Act 2023, requiring providers to assess and mitigate risks from illegal content and remove this content when identified. However, it also stated that not all websites advertising prostitution necessarily fall within the scope of the Act, such as where a provider has a directory of adverts where they control all the content and that content is not pornographic. For those platforms that are covered, Ofcom described the Act as taking a “*systems and processes approach*”, focused on whether platforms have systems in place to meet their online safety duties, meaning that they are not policing content.

Despite Ofcom’s evidence to the Inquiry, the IASC found: “*there have been no publicly disclosed investigations specifically targeting ASWs [adult services websites], although Ofcom has begun enforcement activity against services that are subject to separate duties relating to the providers of pornographic content.*”²⁵ As a result, the existing regulatory framework under the Online Safety Act 2023 has yet to demonstrate how it will address the particular harms associated with websites advertising prostitution, other than imposing highly effective age assurance to prevent the viewing of pornographic content for those under 18.

The UK Government has explicitly recognised the role of websites advertising prostitution in facilitating sexual exploitation. Its 2025 Violence Against Women and Girls Strategy committed to giving police new powers to take down online platforms facilitating sexual exploitation and to “*tackle the misuse of adult service websites for this purpose*”.²⁶ These powers were subsequently introduced through the Crime and Policing Act 2026.²⁷ The Act enables law enforcement agencies, including the PSNI, to apply to a court to suspend an IP address or domain name where there are reasonable grounds to believe that it is being used for serious crime,²⁸ and suspension is necessary and proportionate.²⁹ An order can last for up to 12 months and may be extended by the court.³⁰

While the Inquiry welcomes these new powers, it does not consider them sufficient to address the harms associated with websites advertising prostitution. As outlined above, trafficking and exploitation can be difficult to identify online, and existing trafficking offences already present a high evidential threshold where intent on the part of a website operator must be established.³¹ These new powers similarly require sufficient evidence that a domain name or IP address is being used for serious crime. The Inquiry therefore considers that the law should go further: websites should not be permitted to advertise prostitution in the first place, and enforcement should not depend on a requirement to establish that a serious crime has occurred.

While Northern Ireland does not have legislative competence for telecommunications, it does have devolved legislative competence to create criminal offences for online sexual exploitation and specifically to criminalise activity on websites advertising prostitution.

Proposed reform in Northern Ireland

During the passage of the Justice Bill (currently before the Assembly), Paul Frew MLA tabled an amendment which creates a new Article 64B of the Sexual Offences (Northern Ireland) Order 2008.³² This amendment creates an offence of publishing an advertisement which promotes or facilitates another person's sexual services. It will cover advertisements published online or offline, where the person responsible knows, or ought reasonably to know, that the purpose of the advertisement is the sale of sexual services. The amendment passed at Consideration Stage. At the date of publication of this report, it is unknown if this amendment will remain as drafted or if the Department of Justice will seek to make further amendments.

While this amendment seeks to strengthen the criminal law, not all evidence received by the Inquiry supported prohibiting websites advertising prostitution. Some instead argued for stronger regulation of these platforms. The PSNI, in both oral and written evidence, argued for mandatory safeguards to be introduced to ensure better safety and consistency in how websites advertising prostitution report suspected exploitation and trafficking to law enforcement.

Evidence received by the Inquiry from Ulster University also supported a regulatory approach. The authors argued that the state's duty to protect potential victims of trafficking requires measures capable of identifying exploitation at an early stage and suggested that websites advertising prostitution may require "*closer forms of scrutiny than is generally deemed appropriate for other websites offering services*". They pointed to measures including proactive identification of trafficking, robust safeguarding, clear reporting mechanisms and mandatory data sharing.

The law in England, Scotland and Wales

Unlike Northern Ireland, England, Scotland and Wales have not adopted the Nordic Model and do not generally criminalise the purchase of sexual services, although in England and Wales it is an offence to pay for the sexual services of a person subjected to specified forms of exploitation.³³ Instead, the law focuses on activities associated with prostitution, including public soliciting, causing or inciting prostitution for gain, controlling prostitution for gain, brothel keeping, and offences relating to human trafficking and modern slavery.³⁴

Historically, legislation in England and Wales prohibited the display of advertisements for prostitution through the offence of placing prostitution cards in telephone boxes.³⁵ However, no equivalent offence has been enacted in relation to online advertising. As the IASC observes, while restrictions on offline advertising remain in place, *'equivalent digital prohibitions are largely absent'*, leaving commercial websites that knowingly host and profit from prostitution advertisements largely outside explicit criminal prohibition.³⁶

As in Northern Ireland, the Online Safety Act 2023 provides the principal regulatory framework governing online platforms. However, there is no statutory offence specifically prohibiting websites from publishing or profiting from advertisements for prostitution.

Recent debate in Scotland nevertheless illustrates the growing recognition that online platforms have become central to commercial sexual exploitation. Ash Regan MSP's Prostitution (Offences and Support) (Scotland) Bill sought to introduce the Nordic Model by criminalising the purchase of sex while decriminalising those selling sexual services. Introduced within the context of Scotland's Equally Safe strategy, the Bill sponsor argued that the law had failed to keep pace with the digitalisation of prostitution. Although the Bill was rejected by the Scottish Parliament in February 2026, the debate demonstrated increasing political recognition that websites advertising prostitution require specific legislative consideration.³⁷

The law in the Republic of Ireland

The Republic of Ireland followed Northern Ireland and introduced the Nordic Model in 2017 through the Criminal Law (Sexual Offences) Act.³⁸ Like Northern Ireland, the legislation criminalises the purchase of sexual services and decriminalises solicitation offences in order to reduce demand and enable women to exit prostitution.

The 2017 Act operates alongside existing offences relating to brothel keeping, living on the earnings of prostitution and human trafficking. In addition, Irish law specifically regulates the advertising of prostitution. Section 23 of the Criminal Justice (Public Order) Act 1994 makes it an offence to publish or distribute an advertisement promoting a brothel or the services of a person in prostitution.³⁹ The provision applies

to advertisements communicated by electronic means as well as in print, although it provides a defence for publishers who receive advertisements in the ordinary course of business without knowledge of their nature.

However, as with the legislation here, this Act was brought into force before the dramatic increase in the use of websites advertising prostitution and does not establish a bespoke regulatory framework for commercial online platforms that host prostitution advertisements.

The legal framework in the Republic of Ireland is of particular relevance to Northern Ireland given the shared land border and Common Travel Area. Organised criminal groups may exploit the ease of cross-border movement to facilitate commercial sexual exploitation. In September 2025, during an investigation into an international prostitution network involving women recruited in Brazil, investigators stated that they believed the suspects had used the Ireland-UK Common Travel Area (CTA) to bring women into the Republic via Belfast in order to avoid immigration controls.⁴⁰

Given the threat posed by the CTA, it is important that any reform in Northern Ireland is replicated in the rest of the island and across the UK.

International approaches to websites advertising prostitution

Historically, most jurisdictions have relied on legislation to regulate offline prostitution, including offences relating to procuring, brothel keeping and human trafficking. However, the growth of websites advertising prostitution has prompted some countries to introduce legislation that more directly addresses the role of online platforms in facilitating or profiting from commercial sexual exploitation.

In France, offences relating to procuring prostitution are sufficiently broad to encompass individuals or organisations that facilitate or profit from another person's prostitution, including through online platforms. The offence includes acting as an intermediary between a person in prostitution and a purchaser of sexual services, as well as assisting in or profiting from the organisation of prostitution through electronic communications. Website operators may therefore incur criminal liability where their activities amount to procuring under the French Criminal Code.⁴¹ In 2018, the Paris public prosecutor's office opened a criminal investigation into Vivastreet on suspicion of aggravated pimping, after which the company suspended its 'erotica' listings in France.⁴² Former MSP Rhoda Grant has pointed to this approach as an example of legislation enabling law enforcement to act quickly against websites advertising or profiting from prostitution.⁴³

In the United States, Congress enacted the Allow States and Victims to Fight Online Sex Trafficking Act (FOSTA) and the Stop Enabling Sex Traffickers Act (SESTA) in 2018. The legislation created new federal criminal liability for online platforms that knowingly promote or facilitate prostitution and removed aspects of the legal immunity previously afforded to internet platforms under section 230 of the Communications Decency Act.⁴⁴

Belgium has taken a different approach by regulating, rather than prohibiting, online advertising for prostitution. Following the decriminalisation of prostitution in 2022, the new Belgian Criminal Code introduced a general prohibition on advertising prostitution, subject to specific exceptions. Adults may advertise their own sexual services on platforms specifically intended for that purpose, while providers of such platforms are exempt from liability only if they comply with statutory safeguards designed to protect those in prostitution and prevent abuse and human trafficking. These include verifying the identity and age of advertisers, retaining specified data, reporting suspected exploitation to law enforcement authorities, and operating systems that enable the reporting of abusive clients.⁴⁵

Conclusion

Having surveyed the law throughout the UK and Ireland and given the almost total reliance on websites advertising prostitution to facilitate the purchase of sex, the Inquiry is satisfied that the need for reform of the law in relation to websites advertising prostitution is overwhelming. The APG notes that the Northern Ireland Assembly, through the amendment tabled by Paul Frew to the Justice Bill, has commenced this process.

CHAPTER 2

The Impact of Websites Advertising Prostitution

Summary: Websites advertising prostitution have changed the way prostitution is organised and facilitate and conceal exploitation and human trafficking. These platforms are not neutral actors.

Given the current legal framework does not address websites advertising prostitution as set out in chapter one, it is the view of the APG that the law needs to be reformed to deal with these platforms. The current legal landscape has provided organised criminal networks and traffickers with new opportunities to exploit women for profit through websites advertising prostitution. It is for this reason the APG supports the amendment tabled by Paul Frew MLA to the Justice Bill at Consideration Stage.

Concerns about the risks these platforms present have been consistently raised over the past decade by parliamentary inquiries, independent statutory commissioners and law enforcement agencies.

The APG sought evidence and conducted its own review of available Government, Parliamentary and academic literature to assess the extent to which these platforms facilitate trafficking and commercial sexual exploitation, and assess what action needs to be taken to stop the harm posed by these platforms.

Websites advertising prostitution have transformed commercial sexual exploitation

The growth of websites advertising prostitution has fundamentally changed the way prostitution is advertised and organised. Where prostitution was once predominantly facilitated through street solicitation, newspaper advertisements, telephone boxes, brothels and other locations, websites advertising prostitution allow advertisements to be viewed by large numbers of buyers and transactions to be arranged quickly and discreetly online. In its evidence to the Inquiry, the Centre to End All Sexual Exploitation (CEASE) stated: *“By connecting traffickers and pimps with a large pool of potential buyers, websites advertising prostitution make sexual exploitation easier to market, expand and profit from. They therefore act as accelerators of exploitation.”*

In contrast to CEASE, Ugly Mugs Ireland stated in their written submission to the Inquiry: “[W]e would like to note that major recent academic studies of sex work and the Internet in the UK, such as the *Beyond the Gaze* project, show that access to the Internet, including Adult Services Websites (ASWs), is essential to the safety of persons engaged in sex work.”

This view was echoed by the European Sex Workers Rights Alliance in their evidence, who described access to online advertising as a lifeline for people engaged in sex work. They contend that restricting access to online platforms increases the risk of violence: “sex workers [who] solicit clients primarily through online settings had reduced odds of physical and sexual violence in the workplace, as well as reduced work related stress.”

The Home Affairs Select Committee considered similar contrasting evidence in their report on human trafficking. However, they concluded that websites advertising prostitution “significantly facilitate trafficking for sexual exploitation.”⁴⁶ In its inquiry into prostitution, the Westminster All-Party Parliamentary Group (APPG) on Prostitution and the Global Sex Trade likewise concluded that “pimping websites facilitate the vast majority of the UK’s sex trade”.⁴⁷

More recent research by the IASC demonstrates the scale of this online market, while also drawing on extensive interviews with survivors about their experiences of online platforms. The Commissioner identified 62,900 advertisements across 12 websites advertising prostitution and other subscription-based platforms. These sites attracted almost 41.7 million visits in a single month, illustrating the scale of demand for sexual services advertised online.⁴⁸

These findings reflect a broader shift in the organisation of prostitution. These websites have created a sophisticated digital marketplace through which prostitution can be searched, filtered and arranged. Search functions, reviews, photographs, and messaging services allow buyers to contact women⁴⁹ advertised quickly and anonymously, enabling prostitution to operate at a scale and level of accessibility not previously possible.⁵⁰ In fact, these features have inflated demand for paid sex “by offering sex buyers an almost unending supply of women whose bodies they can purchase sexual access to, and curating buyers’ preferences”.⁵¹ Today, websites advertising prostitution are associated with a significantly higher number of buyers per day compared to street-based solicitation.⁵²

The IASC concluded that online environments also lower barriers to entering prostitution in ways that would not have occurred offline.⁵³ Survivor accounts in the report showed that this was not confined to one demographic: teenagers and adult women from both economically vulnerable and relatively stable backgrounds described pathways involving grooming, peer influence, drug use and financial pressures.

One survivor described how quickly she was able to begin selling sex after being introduced to a website: “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.”⁵⁴ Another woman described her entry into prostitution through a friend who described it as ‘paid dating’: “It was a friend that introduced me to it...She made it sound like freedom, like I’d be in control. But it wasn’t like that at all.”⁵⁵

For another survivor, exploitation developed through a controlling relationship in which the perpetrator took over her communications and profited from her prostitution:

“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.”⁵⁶

Research from the Republic of Ireland similarly demonstrates how deeply online advertising has become embedded in the organisation of prostitution. The SERP Institute notes that, since the early 2000s, prostitution in Ireland has primarily been advertised online, with women - including those who have been pimped, exploited or trafficked - commonly presented as ‘independent escorts’. This is particularly relevant to Northern Ireland because the online commercial sex market operates across the island of Ireland.⁵⁷ As the IASC observes, exploitation now operates “*behind screens as well as on the streets*”, requiring regulatory and enforcement frameworks to evolve accordingly.⁵⁸

Websites advertising prostitution facilitate exploitation and human trafficking

The operators of the website Escort Ireland, Beige Bear Ltd, state in their written submission to the Inquiry:

“[E]xploitation may appear in online advertising and that risk must be taken seriously; however, it does not follow that a verified, monitored and cooperating advertising platform operates or profits from exploitation. This platform’s income is advertising revenue, not a share of sexual transactions. It is known to law enforcement, operates within an existing regulatory field and holds identity and contact data that can assist investigation.”

However, the IASC states in her report that these sites “*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.*”⁵⁹ Rather than acting as passive online marketplaces, they provide the infrastructure through which commercial sexual exploitation can be organised, marketed and monetised.

This view is supported across the literature. The National Crime Agency has identified websites advertising prostitution as “*significant enablers of trafficking and sexual exploitation*” as they enable traffickers to advertise victims and maintain control of payments.⁶⁰ Similarly, the Joint Slavery and Trafficking Analysis Centre described them as “*the most significant enabler of sexual exploitation in the UK*”.⁶¹

One of the principal advantages for traffickers is they can access buyers on these platforms while concealing their activities more effectively from law enforcement. The Organisation for Security and Co-operation in Europe (OSCE) found that:

“online platforms allow any trafficker...to advertise their victims on the Internet... traffickers are in a position to reduce their operations on the streets and move them entirely into a virtual space. This way, traffickers do not have to worry about their victims being spotted by law enforcement or anti-trafficking NGOs. This is a significant de-risking of the crime as it serves to create an additional barrier to law enforcement in victim and trafficker identification.”⁶²

This is reflected in operational policing evidence from the UK. Detective Superintendent Filippo Capaldi, former Head of Police Scotland’s National Human Trafficking Unit, described websites advertising prostitution as “*one of the main facilitators of trafficking for the purposes of sexual exploitation in Scotland and the rest of the UK*” and said the police “*come across them quite commonly when we are dealing with trafficking inquiries, particularly involving foreign nationals.*”⁶³

Websites advertising prostitution facilitate the concealing of harm through features on the platforms

In their written submission to the Inquiry, Vivastreet argued that websites advertising prostitution can mitigate risk through the features and moderation of the platform. They stated:

“As an online host of user-generated content, Vivastreet can assess and moderate what is posted on the site and can enforce policies and remove content, but we cannot determine, as a matter of fact, what occurs offline...We reduce the likelihood of misuse through layered controls, and act decisively where content or behaviour on the platform indicates harm, coercion, exploitation, trafficking or other serious risk”

However, the Inquiry is concerned upon hearing evidence from a survivor that platforms are used to make the concealment of exploitation easier. In oral evidence to the Inquiry, she said:

"You have the websites but they bring the people from online actively looking for girls, our customer base knew that we were either being drugged before the appointment so that we were completely incoherent, you could not say yes or no, your body is paralysed, that's not said online."

The IASC identifies these hidden features including anonymous buyer access, the ability for third parties to create and manage profiles, weak identity verification, multiple advertisements being linked to the same contact details, and payment or profile-management functions that can be controlled by someone other than the person advertised. These features can allow traffickers to advertise and manage multiple victims remotely, while making it more difficult for platforms and law enforcement to establish who is controlling an advertisement or receiving its proceeds.⁶⁴

One survivor who was interviewed for the IASC review described her experience on a platform where she experienced lack of agency through third-party profile control: *"I didn't have any control over accounts, over the money I was making, over passwords, logins or anything like that."* Despite not meeting any clients in person, as she was forced onto camming sites, she later recognised this as trafficking.⁶⁵

Another survivor was managed by a man who controlled the profiles of multiple women trafficked from Brazil:

*"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."*⁶⁶

The Westminster APPG on Commercial Sexual Exploitation concluded that there is *"no realistic or reliable way"* for website operators to prevent exploitation. While certain indicators, such as multiple profiles linked to the same telephone number, may suggest trafficking or coercive control, the absence of these signs does not mean that a person is actually free from coercion or exploitation.⁶⁷ Furthermore, the commercial incentives of such sites may undermine efforts to effectively regulate their platforms. The SERP Institute argues they *"knowingly or with gross negligence facilitate and indeed profit from sexual exploitation."*⁶⁸

The impact of this exploitation on the women involved is enduring and significant. The IASC notes, *"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."*⁶⁹ The IASC's research showed that women felt these platforms robbed them of their autonomy and acted as a gateway to trafficking, as they were led into acts they neither chose nor understood.⁷⁰ This is why the Inquiry has also included recommendations on support for those seeking to leave prostitution. In particular, the Department of Health should

publish an updated and properly funded strategy for leaving prostitution, which specifically addresses online exploitation and provides individual advocacy support to help victims navigate the criminal justice system.

Websites advertising prostitution are used to conceal the realities of exploitation

Platforms typically present women as independently offering sexual services directly to sex buyers. However, this appearance of autonomy can obscure the involvement of pimps, traffickers and organised criminal networks. The OSCE notes that, *“Traffickers usually do not advertise human trafficking victims per se, but create the appearance of services being delivered willingly by the victim.”*⁷¹

The SERP Institute’s research in the Republic of Ireland demonstrated this problem. Researchers noted that, while women are publicly visible through their profiles, sex buyers and third parties can benefit from the anonymity provided by the internet. Women experiencing exploitation or third-party control may be advertised as ‘independent escorts’, meaning the exploitation may not be apparent from an individual advertisement.⁷² However, research analysing websites advertising prostitution has shown that patterns across multiple advertisements, including shared telephone numbers and movement between locations, can reveal indicators of organised activity and potential trafficking.⁷³

This creates particular challenges for identifying trafficking. An advertisement which contains no obvious sign of exploitation cannot be assumed to be independent. Control may instead be exercised through management of the profile, contact with buyers, movement between locations, control of money or other arrangements that are not visible to somebody viewing the advertisement. In their written evidence to the Inquiry, CEASE stated: *“The ease with which adverts can be created and managed on another person’s behalf makes it difficult to distinguish independent advertising from coercion, control or trafficking.”*

This is also reflected in the IASC’s UK-wide research. The Commissioner found that these websites *“operate as high-volume environments where individual exploitation can be easily concealed behind professionalised presentation and apparent autonomy.”* Patterns such as shared contact information and third-party profile management become more apparent when advertisements are examined collectively rather than individually.⁷⁴

Conclusion

Having considered the evidence received by the Inquiry, and having reviewed the evidence from independent statutory commissioners, parliamentary inquiries, and law enforcement agencies, the APG is convinced that websites advertising prostitution are a conduit for traffickers and pimps in the exploitation of women and girls.

The APG is concerned that exploitation is being hidden in plain sight online. The Inquiry accepts the evidence received from the operators of the websites stating they do not profit directly from sexual services. However, they simply cannot be blind to the fact that their platforms connect women, who are facing exploitation, with sex buyers, predominantly men, who are encouraged to purchase women's bodies as if they were a commodity. No moderation or strictly drafted terms of service for posting on these platforms can mitigate that reality.

It is the Inquiry's view that websites advertising prostitution make exploitation easier to organise and conceal. Features which allow sex buyers to search for women according to sexual preferences can turn prostitution into a digital marketplace. Other features enable traffickers to manage multiple profiles, control communications and payments, and determine the services they are expected to provide. The platforms enable women to be moved easily from location to location. These platforms are not neutral actors. It is the Inquiry's view that the platforms facilitate exploitation.

CHAPTER 3

The Inquiry's Own Data Analysis

There are challenges in assessing the prevalence of sexual exploitation on websites advertising prostitution. Given that the Inquiry concluded (in chapter two) that websites advertising prostitution provide the opportunity for exploitation and trafficking, the Inquiry conducted its own research to attempt to understand the scale of the harm on platforms accessed most commonly in Northern Ireland.

Methodology

To make an assessment of harm, data from the four main websites advertising prostitution operating in Northern Ireland was collected by the Inquiry.

- Advertisements for the greater Belfast area were captured over a five-week period (9 April to 7 May 2026).
- Data was recorded on five consecutive Thursdays to provide a representative snapshot of the profiles available in Northern Ireland.
- Thursday was selected because the number of advertisements begins to increase ahead of the weekend, capturing both typical weekday activity and the busier weekend period.
- Data was captured from the four platforms (Website A, Website B, Website C and Website D⁷⁵) and analysed by the Inquiry research team using the Sexual Trafficking Identification Matrix (STIM).
- The IASC's report automated its data collection from the data available on websites advertising prostitution and measured the automated data against STIM,⁷⁶ whereas our Inquiry did not follow that approach. The Inquiry utilised STIM by researchers examining individual advertisements, one profile/one listing at a time. This allowed qualitative assessments to be made for each profile.

What is STIM?

The Sexual Trafficking Identification Matrix (STIM), developed by the University of Sheffield, is a tool primarily designed to help identify potential victims of sexual exploitation and human trafficking.⁷⁷ STIM is used to analyse advertisements for prostitution. The matrix allows researchers to assess each advert and sort them into categories for potential risk, resulting in an assessment of low, medium, or high-risk depending on the information observed.⁷⁸

STIM was used as the basis for the Inquiry's own research, as it represents the most robust and established matrix open to researchers at the current time. This matrix has also been used in other studies, including the IASC report and research by The SERP Institute⁷⁹. Using the matrix ensures methodological consistency across research projects and enables comparison with other studies.

As of September 2025, STIM had been utilised by six police forces and two charities in the UK, four police forces abroad, and the Danish Centre Against Human Trafficking (CMM).⁸⁰ In evidence submitted to the Inquiry, the PSNI confirmed that it also uses STIM to assess potential indicators of trafficking, alongside a bespoke police-only web-scraping tool.

Criticism of STIM as a research tool

The Inquiry received evidence from several respondents criticising the use of STIM for this type of research. The operator of one website advertising prostitution informed the inquiry that:

"STIM is a triage aid for a police officer looking at one advert at a time, to decide where to point scarce investigative resource.... It is not a victim-counting instrument, not a prevalence-measurement instrument, and not a basis for regulatory prohibition."

This criticism is also recognised by organisations that utilise STIM in their studies. The SERP Institute states:

*"It must be borne in mind that an analysis using STIM that positively identifies any of its indicators should not be taken as definitive proof that trafficking or sexual exploitation are occurring on the website in question. Rather, the identification of STIM indicators points to the potential for these harms to be occurring on the platform and the need for further investigation."*⁸¹

It is recognised by the APG that STIM is far from perfect as a research tool, and even a high prevalence of indicators on a particular profile does not constitute absolute proof of trafficking or exploitation.

Nevertheless, STIM provides a structured framework for looking beyond the appearance of an individual online advertisement to identify indicators that may suggest exploitation, coercion, third-party control or trafficking. The sheer volume of advertisements on these websites makes meaningful monitoring difficult and allows potential exploitation to remain hidden among thousands of profiles. Without a standardised tool, researchers would struggle to compare advertisements, identify trends, or assess risk consistently across thousands of profiles. STIM therefore transforms qualitative observations into a replicable methodology, enabling patterns to be measured rather than merely described.

As chapter two demonstrates, traffickers and those who exploit women use websites advertising prostitution to communicate with sex buyers, manage bookings and maximise profits. It is therefore important to scrutinise individual advertisements for indicators of exploitation and assess the scale of that potential exploitation in Northern Ireland.

People engaged in exploitation and trafficking often generate identifiable patterns in how they post adverts. The SERP Institute has identified that repeated phone numbers across multiple profiles, identical text appearing in different advertisements, references to women being 'new in town', unusually low prices, indications of third-party management, and advertisements featuring multiple women can all suggest forms of organisation or control that researchers would otherwise struggle to detect. When these indicators cluster together, this should, at the very least, raise concerns.⁸²

STIM's value lies not in proving exploitation is taking place, but rather in making potential exploitation visible. Given that trafficking and coercion are often deliberately concealed behind apparently consensual online profiles, a structured method for identifying warning signs is indispensable. STIM therefore remains an imperfect but valuable research tool that helps by producing evidence capable of informing policy, regulation and safeguarding interventions.

During the study period, any profiles that, in the opinion of researchers, indicated a high degree of risk were referred to the PSNI. In evidence to the Inquiry, the PSNI stated that they followed up on 20 of the 80 profiles sent for further investigation. They were unable to establish, at the time of visiting an individual, that trafficking or exploitation had taken place. However, that does not mean that exploitation had not occurred, as individuals may disclose concerns to the police weeks or even months after initial contact. The fact that the PSNI conducted welfare visits demonstrates that the information provided by the Inquiry was considered sufficiently concerning to warrant further investigation.

One advert, posted on website D, contained pictures of what appeared to be a person under 18. In oral evidence, the PSNI confirmed they had made contact with the individual and determined that the person who posted the advert was in fact in their 40s. In evidence, the PSNI stated that no further action was taken. They informed the Inquiry:

"This ad was not criminal. It could be a catfishing ad, to get clients. That is not unusual... what you see in those photos is often not the person that you knock on the door and see."

The APG considers it unacceptable that an advertisement using photographs potentially depicting a child should fall outside the criminal law. While the photograph used was not indecent, and therefore does not meet the threshold for prosecution under Article 3 of the Protection of Children (Northern Ireland) Order 1978, it is concerning that charges under the Fraud Act 2006 or Sexual Offences

(Northern Ireland) Order 2008 were not considered in this case. If the PSNI deems the current law to be insufficient to address this type of fraudulent behaviour, this should be urgently addressed. The use of an image of a child, even if not indecent or AI generated, should be prohibited from a website advertising prostitution, even if that child themselves is not being offered for sexual services. We would urge the PSNI to engage with the Minister of Justice to set out what powers are needed to enable them to take action, if the current law does not allow for an arrest to take place.

STIM DATA Analysis April/May 2026

Between 9 April and 7 May 2026, individual adverts were analysed by four researchers on behalf of the Inquiry. On four Thursdays out of five during the research period, the same person analysed one of four platforms operational in Belfast. Individual adverts were examined and assessed against the STIM indicators.

To minimise reputational risk and ensure ethical research practice, the websites analysed in this report have been anonymised. Anonymisation helps to prevent the identification of specific commercial entities while allowing meaningful comparison of features, practices, and outcomes. Each website is therefore referred to using a neutral identifier rather than its real name or URL. The four platforms analysed are referred to in this report as Website A, Website B, Website C, and Website D.

In the first instance, quantifiable data was gathered across all the advertisements on each platform. This data varied across platforms due to the functionality of the site. The data typically collated was:

- The total number of advertisements for sexual services on each site
- The total number of advertisements per each Northern Ireland county
- The total number of advertisements by gender on each site
- The total number of advertisements by age
- A breakdown of the nationalities of those being advertised
- A breakdown of the type of service being offered

Over an eight-hour period, individual advertisements stating they were aimed at the greater Belfast area were assessed manually against STIM. Given the time constraint and the sheer number of adverts, it was not possible to individually access every advert placed on each platform for the Belfast area. Consequently, the data presented is what could be accessed between 9am and 5pm on four Thursdays over a five-week period. It should also be acknowledged that many people are advertised across multiple platform; therefore, it is probable that some analysis involves duplicate profiles.

Nationality of people advertised

Three out of the four websites allow sex buyers to filter by nationality. Websites A, B and C filter by country. However, there was considerable variation between the three.

Website A		Website C	Website B	
Brazilian	40%	19%	Latino/a	40%
Colombian	8%	4%	Asian	27%
Spanish	8%		Caucasian	24%
Czech	7%		Other	7%
Italian	4%			
Hungarian		4%		
Irish		4%		
British		50%		

Table 1: Nationalities/regions of those advertised with percentages > 3% of the total

KEY TAKEAWAYS

- Website A had the greatest breadth of nationalities for a potential sex buyer to choose from; on any given week up to 29 nationalities are advertised
- Asian nationalities were more common on Website B than Website A during the research period (it should be noted ‘Asia’ is a vast continent and it was not possible to be country-specific from the data collected)
- Brazilian nationals were prevalent on Websites A and C
- British nationals had the highest prevalence on Website C

It was not possible to filter for nationality on Website D, although it was observable that more women advertised on this platform were from Northern Ireland when compared to other websites. This complements evidence given to the Inquiry by survivors.

In 2014 (the most recent data available), a report found that 17,500 men paid for sex in Northern Ireland, with 86% considered to be local.⁸³ By contrast, the majority of women available on websites advertising prostitution are migrants.⁸⁴ While this data does not explicitly prove trafficking or exploitation, it is noteworthy that migrant women are coming to Belfast to meet a predominantly domestic demand for sexual services.

From this data, it is not possible to identify individuals who are trafficked, but clearly a system of organised migration from other countries to Belfast is observable. During the research period, several women were observed being moved within a week from Belfast to other parts of Ireland. Profiles that had advertised them in Belfast the previous week were subsequently found on the same website advertising them in

another region of Ireland. While this is not proof of structural trafficking, it is worthy of further investigation and analysis, as the observable data could point to systemic concerns.

Age of people advertised

The age of those being advertised on each site was also recorded during the research period. Again, due to differences in functionality, the categories cannot be directly compared. Website C had a sliding scale for selecting age and therefore did not have a scale comparable to Websites A and B.

STIM Indicator 8 (‘Age: subject appears to be between 18–24 years old’) was most prevalent within the advert text on Website B and Website D. Website B had many advertisements listed as aged between 20 and 24 years old, with one instance of someone being advertised as 19 years old.

Website	18-24	24-31	32-38	39-45	46-52	53-60+
A	12%	40%	30%	13%	5%	1%
B	36%	37%	13%	9%	5%	1%

Table 2: Age of those advertised on Websites A and B over the 5 week period

KEY TAKEAWAYS

- On the websites dedicated to advertisements selling sexual services, sex buyers can filter by age. Age profiles of those advertised varied significantly between platforms.
- Age data alone cannot establish trafficking or exploitation. At most, it shows that demand exists for younger women. Given the relative vulnerability of younger women, a profile of a person who is younger often displays other indicators of exploitation.
- Research and cases routinely demonstrate that, although not exclusively, young adults are more likely to be targeted by trafficking gangs because of their relative vulnerability. Market demand often prioritises youth, and traffickers will therefore seek to exploit younger women and even children.⁸⁵
- The SERP Institute highlighted in its analysis that advertising youthfulness amplifies risk, as it implies vulnerability and also highlights what sex buyers demand and who will be targeted by trafficking gangs.⁸⁶ Research undertaken by the Inquiry would support the conclusions of The SERP Institute.

Gender of people advertised

During the research period, those advertised were overwhelmingly women. Data was not collected for Website D but, from observation, women were more likely to be advertised than men on that platform.

Website	Percentage Women Advertised
A	82%
B	96%
C	82%

Table 3: Percentage of persons advertised that are women on Websites A-C over the 5 week period

KEY TAKEAWAYS

- It is unsurprising that the large majority of people advertised on these websites are women: men overwhelmingly account for those who purchase sex.
- The data gathered only further underscores that sexual exploitation and trafficking should be a priority for the Executive’s VAWG strategy.

STIM Data Collection for Individual Adverts

The specific indicators used in STIM have evolved since they were first formulated. During the research period, 27 indicators were assessed against each individual advert. See table below:

Indicator	
1.	Poses seem unusual or extreme; appears overly explicit.
2.	Facial expression of subject shows general or potential unease
3.	Any or multiple inconsistencies between photo and description
4.	Background looks like non-private resident (Hotel, etc.)
5.	Background is familiar
6.	Use of stock photo(s)
7.	Low quality/resolution image(s)
8.	Age: subject appears to be between 18-24 years old
9.	Use of ‘she’ / ‘they’ / ‘we’ instead of ‘I’
10.	Same/similar text as other ads for different subjects
11.	Same contact number in different ads

Indicator	
12.	Same poster/user ID across multiple ads
13.	Poor grammar and misspellings in the text
14.	Inconsistencies in username or 'story'/location
15.	Current availability in multiple locations across the region
16.	Historical availability across the country
17.	References to being new: new in town' / just arrived' / new 4 you'
18.	References to youth: young and cute' / sweet' / fresh' / 'candy'
19.	Use of emojis, e.g. peach/cherries
20.	Little or no further information in Q&A section
21.	Long list of services offered in ad, e.g.10 or more services
22.	Specific services: bareback/anal/OWO (oral without a condom)
23.	Additional services at no extra price or very low price
24.	Services offered at an 'All Inclusive' price
25.	Low price for the local marketplace
26.	X Factor
27.	Reviews

Over the research period every indicator was observed at least once on at least one website; 14 out of the 27 indicators were observed on all four websites. Each website displayed different indicators of harm and the Inquiry research found little correlation across the platforms making comparison difficult. Despite the difficulties in making meaningful comparative analysis the Inquiry observed the following:

Photographs/Images

The photographs/images contained in adverts were assessed against a number of STIM indicators.

Indicator 1 ('Poses seem unusual or extreme; appears overly explicit') was one of the most prevalent indicators across Website B and Website C. The use of extremely explicit photographs has been identified as a highly significant indicator of exploitation.⁸⁷ Website C had a number of advertisements with genitals displayed and pornographic videos as part of the advertisement. One advertisement on Website B was especially concerning: in addition to explicit photographs, nine other indicators of exploitation were observed (profiles that raised concerns were shared with the PSNI).

Website A had a high prevalence of Indicator 4: 'Background looks like non-private residence (Hotel, etc.)'. Photographs taken in hotels or other non-residential settings may indicate a more transient environment with limited personal autonomy and third-party control. The use of hotel rooms or rented accommodation is a common

indicator of potential exploitation, to the extent that an app has been developed to help identify hotel-room backgrounds in photographs where a person may be being sexually exploited or trafficked.⁸⁸ One example of this was a human trafficking case in Galway in 2025, where a man forced a woman into prostitution in rented accommodation across Ireland. Photographs taken in the accommodation were used to advertise her online.⁸⁹

Indicator 6 ('Use of stock/professional photo(s)') was another prevalent indicator on Website A. A stock photo is a professionally produced, pre-existing photograph that is unlikely to be the person a purchaser of sex will meet if they proceed with a booking. Traffickers rarely manage one person, and real photos require the person to be present. Stock photos allow the criminal gang to mass-produce adverts and just use the imagery of the first woman trafficked to that area when a buyer contacts them through the platform. This is a significant indicator of trafficking. Often these photographs are used without the consent or knowledge of the person being advertised. In addition, people operating scams often use fake photographs to force men to pay money upfront for a meeting which never takes place.⁹⁰ It was noted on Website D that some popular OnlyFans models were advertised as being in Belfast, in what was an assumed scam. Professional photography requires a photographer, equipment, editing and often a budget, which women trafficked to the UK do not have access to. As observed by the IASC, professional presentation can be used to suggest autonomy and deflect attention away from possible trafficking.⁹¹

Platform features

Website B had a high prevalence of Indicator 12 ('Same poster/user ID across multiple ads'). Over the research period, two account IDs had posted a number of advertisements for different women to Website B. This is concerning as it highlights that an individual or criminal gang may have control over multiple women, indicating that women are being transported in and out of an area to maximise profits. Several people giving evidence to the Inquiry highlighted this indicator as one of the most concerning. In her oral evidence, Ruth Breslin from The SERP Institute stated:

"we see that pimps [and] sex traffickers, are advertising groups of women en masse, that they are organising and controlling so many that even if there is this illusion of independence, that is not really the case in the background. So we now see these sites as essentially core to the business model of those who seek to sexually exploit, because they couldn't do it without this market place or shop window of the sex trade."

Previously, pimps would need to physically stand on the street with women to control prostitution. In evidence regarding Website B, Kat Banyard from UK Feminista observed:

“Each advert on [Website B] has a user ID. So that’s the account that posted that advert. And it tells you, for some reason, how many other adverts are live at that time posted by that user account. And just the fourth one down that I looked at today before giving evidence said that the number of other active adverts on the site posted by that user was 150.”

One account advertising multiple people was observed on Website D. This type of practice, observed during the Inquiry research period, was also highlighted in the BBC documentary *Caitlin Hanna: Trafficked in Belfast*. In evidence to the Inquiry, Executive Producer of the documentary, Kelda Crawford-McCann, discussed findings from her research:

“One of the most striking findings was how the young women explained that the profiles were created and put up by other people. They were managed by other people. They were used for bookings—they didn’t have a say in the bookings and it was very much run as a business.”

Indicator 15 (‘Current availability in multiple locations across the region’) was a feature of a number of advertisements on Website A. Availability across multiple locations can indicate that person is being transported across different locations to maximise commercial profitability and increase demand. This person may lack autonomy and be in an unfamiliar, and therefore unsafe, environment. An advertisement may not only appear in multiple locations; its wording can also suggest that the person advertised is moving between locations. On Website A, several advertisements said that the person being advertised was only in Belfast for a set number of days. On Websites B and D, multiple women had active listings across the UK. These adverts were often linked to profiles that advertised more than one person.

Indicator 17 (‘References to being new: ‘new in town’ / ‘just arrived’ / ‘new 4 you’), whilst found on all sites, was most prevalent on Website C. A high proportion of the advertisements on Website C used language such as:

“new Asian”
“First time here”
“new in town”
“new escort party girl”
“new real lady”

Adverts describing women as ‘new to Belfast’ or ‘on tour’ were prevalent across all platforms. This reflects the premium some sex buyers place on purchasing sex from women who are presented as new or recently arrived.

Services Available and Pricing

Indicator 21 ('Long list of services offered in ad, e.g. 10 or more services') was a prevalent indicator found on advertisements on Website A. A long list of services may indicate that the individual is being coerced or forced to partake in a wide range of services that, in the absence of coercion or force, a woman would not otherwise offer. A long list of services is a 'marketing' technique and could be utilised by those seeking to maximise sales of those they are exploiting. On Website A, almost all of the advertisements on which Indicator 21 was observed also had Indicator 22 ('Specific services: bareback/anal/OWO'), which are high risk services. Offering high risk activities can imply that the person being advertised has limited control over the acts they are required to perform.

Indicator 22 was also found numerous times on Websites C and D. In one week on Website A, 85% of advertisements assessed offered 'cum in mouth' as a service, and 70% of advertisements offered anal sex as a standard service. These are clearly high-risk activities. It was particularly concerning to identify multiple advertisements across all platforms offering sex without a condom. Even where there is no indication of exploitation, the open advertising of such practices has serious implications for women's sexual health.

Other Data

STIM indicator 26 ('X Factor') permits researchers to record other information that may be indicative of exploitation that is not recordable under other indicators. Website D has a high level of 'X factor' data, including

- Concerning role play scenarios, such as 'daddy-daughter'
- Drug use specifically mentioned/implied in the advertisement. The woman advertised will be using drugs and drugs are available for the sex buyer
- Available 24/7
- A high level of 'car meets' often associated with drug taking

These concerns were corroborated in oral evidence to the Inquiry from Witness A, who had been advertised by others on Website D without her consent. She stated:

"I was advertised on [Website D] ... [the] customer base knew that we were either being drugged before the appointment so that we were completely incoherent. You could not say yes or no. Your body is paralysed ... like a lot of the other women involved have [said] your voice goes, you have no power in your body but you know everything that is happening, to a degree. A lot of drowsiness, so your consent is taken away the minute they book you."

Indicator 27 ('Reviews') was found in numerous adverts on Website C. Buyer reviews can reveal control or inconsistencies that are not always detectable by the advertisement alone. Several reviews on the websites discussed the 'experience' of

the woman, as well as language barriers that the sex buyers faced when they encountered a woman with limited English. Reviews suggested that language barriers or signs of vulnerability did not necessarily deter sex buyers. Instead, some buyers expressed frustration about these factors. This reflects findings from previous research examining sex-buyer reviews.⁹²

Below are some examples of concerning reviews found on the websites:

“Everything agreed in advance on whatsapp, with very professional communication over the messages. However things didn’t go well from the moment I arrived. She didn’t seem comfortable and was a bit too strict when dealing with me. Despite asking her twice if she’s comfortable she said everything fine. However she did not perform the favourites requested properly and kept pushing me away throughout the appointment.”

“Still learning her craft, it was both frantic and exciting, it can only get better. Extra time needed on the next date for a steadier rhythm and get to know each other...Her English is quite good too and will improve over time. Yeah, that body is something else.”

“Her english is not the best but she is intelligent enough to have a convo with”

“Young & Beautiful though hesitant & reluctant to provide all listed service. extra charges for owo dfk⁹³. Room was tiny. Done in 15 mins.”

“(f)ucked this girl few times amazing session great tits she gives good blowjobs and I fucked her good highly recomend [sic] thanks”

Reviews suggested that reluctance during an encounter, including unwillingness to engage in certain sexual acts or the setting of sexual boundaries, was often viewed negatively by purchasers. Reviews also suggested that purchasers know women are being paid to pretend they are enjoying the sexual encounter, but the men carry on with the transaction regardless. The language used in reviews also demonstrates that those purchasing sexual services see the women as commodities or objects.

The Inquiry’s analysis of these four websites provided important evidence about the scale and characteristics of websites advertising prostitution in Northern Ireland. It also identified the indicators of exploitation most prevalent on each site. While STIM indicators were not confined to any one platform, individual websites displayed distinct patterns and contextual features.

Taken together, the data gives the Inquiry serious cause for concern that some women advertised in Belfast may be victims of trafficking or exploitation.

Comparison with other studies

The findings of the Inquiry’s STIM analysis closely align with conclusions reached both by The SERP Institute and the IASC in their studies. While each piece of research utilised slightly different methodologies, all three studies identify similar indicators of

exploitation, reach comparable conclusions about the role of websites advertising prostitution, and reinforce findings that these websites host adverts which give cause for concern about the welfare of those advertised.

The Inquiry considers this convergence of research significant. It suggests that the patterns observed are not confined to a particular region or platform but recur across different websites and studies.

The SERP Institute identified large numbers of profiles advertising young women, and the frequent use of language emphasising youthfulness, innocence and inexperience.⁹⁴ The IASC found ‘*young age claims*’ to be among the most common indicators associated with elevated exploitation risk.⁹⁵ Our research aligns with the conclusion that the commercial demand for youth creates vulnerabilities which traffickers and those who control women and girls may seek to exploit.

A second major area of agreement concerns indicators of third-party control. The Inquiry identified repeated user IDs, shared advertisements, multiple women advertised through single accounts, duplicated profile text, and evidence of coordinated management across platforms. The SERP Institute drew similar conclusions from repeated text, common photographic backgrounds, and profiles apparently managed by organisers rather than the women themselves.⁹⁶ The IASC’s research echoed these findings through survivor testimony, describing how exploiters created profiles, controlled communications, arranged bookings, and managed earnings.⁹⁷ Across all three studies, these indicators are given significant weight because exploitation often involves a high degree of control over victims for financial gain. The prevalence of these indicators is therefore particularly significant when considered alongside the survivor accounts recorded by the IASC. These accounts closely reflect the survivor evidence given to the Inquiry.

Witness A told the Inquiry she was one of multiple women who were drugged, exploited and trafficked across Belfast. She went on to describe the signs of trafficking she believed others should look out for:

“I do honestly think that there [should] be awareness out there about key words, that anybody who is maybe watching these sites that the girls are advertised on, [there are] key words that I can explain to people to look out for, like I would know that would mean it is a trafficked woman...These men dictate whether you wash, whether you eat, whether you sleep or are on the streets that night, or whether you are his favourite girl that week, if you’ll get to stay in one of the houses or the barn that he ran us from.”

Research is also remarkably consistent regarding the constant movement of women advertised and references to being ‘new’. The Inquiry found widespread use of phrases such as ‘new in town’ and identified profiles showing availability across multiple locations. The SERP Institute highlighted references to ‘new for you’, ‘fresh’ and ‘just arrived’⁹⁸ which the Inquiry also observed being referenced over several platforms.

The Inquiry's finding that many advertisements offer higher-risk sexual encounters, including oral sex without condoms and anal sex, also reflects a pattern identified in other studies. The IASC's report recounted the experiences of survivors who felt *"pushed into increasingly extreme acts via [the website's] '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.⁹⁹ These findings suggest that websites advertising prostitution can facilitate commercial pressures that may increase vulnerability to exploitation and harm.

Conclusion

The convergence of research identifying observable indicators across platforms reinforces the Inquiry's view that websites advertising prostitution should not be viewed as neutral spaces. Recurring indicators associated with organisation, control and vulnerability suggest that these platforms can provide a digital infrastructure through which exploitation is enabled and concealed. The Inquiry recognises that not every advertisement on the four platforms examined represents exploitation. However, the evidence is sufficient to conclude that websites advertising prostitution can create an environment in which exploitation is able to remain hidden in plain sight.

The Inquiry is concerned that the Home Affairs Select Committee identified the prevalence of red-flag indicators on websites advertising prostitution as early as 2023 and called for action.¹⁰⁰ These included the same phone number appearing across multiple advertisements and a single profile controlling several adverts, both identified by the Committee as *'red flags for trafficking'*. Yet three years later, this Inquiry identified the same indicators across all platforms examined. It would appear that little has changed across the platforms examined to make the environments they host safe.

Urgent action is therefore required to prevent these platforms from providing an environment in which criminal gangs and traffickers can conceal and facilitate exploitation.

CHAPTER 4

Recommendations

The conclusion and recommendations of the Inquiry fall into three broad categories:

1. *Placing a ban on the platforms*
2. *Properly resourcing survivors*
3. *Equipping police and law enforcement to end exploitation*

Placing a ban on the platforms

The Inquiry carefully considered the evidence from the platforms themselves, which acknowledged that trafficking and exploitation can occur on their websites. Therefore, the key question for the Inquiry was whether the sites should be banned or if the platforms could be allowed to remain operational, subject to stronger regulation to ensure safety.

The fact that trafficking and exploitation are facilitated by websites advertising prostitution was confirmed by the Public Prosecution Service (PPS). In written evidence to the Inquiry, they stated:

“In terms of the role of Adult Services Websites (ASWs), we can confirm that perpetrators of offences of human trafficking for the purposes of sexual exploitation and controlling prostitution do use such sites to enable and facilitate the exploitation of their victims. It should be noted that a number of ASWs have co-operated with police in the course of their investigations into such cases.”

The PPS evidence provided the Inquiry with a serious issue to consider, namely, the extent to which law enforcement and prosecutorial authorities should rely on websites advertising prostitution to secure crucial evidence to enable successful prosecutions. Platforms cooperate with police and prosecutors to identify victims and provide the names of traffickers and criminal gangs operating in Northern Ireland. The PPS contends that this cooperation is vital. The use of evidence from these websites was supported by the PSNI in their oral evidence to the Inquiry:

“The Public Prosecution Service (PPS) has the ability to run victimless prosecutions for MSHT¹⁰¹ cases. This occurs when a conviction is secured without the co-operation of victim(s). It relies on evidence to prove guilt with limited, adverse, or no participation by victims. A successful example of this is PSNI proactive operation, Op Liverless. This large scale, international operation into human trafficking for sexual exploitation, resulted in the conviction of two defendants for human trafficking and associated offences, without the co-operation from any potential victims. Both perpetrators are due to be sentenced imminently.

In this instance, evidence supplied from ASW’s was vital in securing these convictions. Furthermore, the PPS have a number of dedicated MSHT prosecutors, who work closely with OCB¹⁰² investigators from the outset of such investigations. These close working relationships are invaluable to help achieve successful prosecutions in this field.”

Clearly, in at least one successful prosecution, websites advertising prostitution provided evidence to the police and PPS that was pivotal in securing a conviction. This seems to be especially useful for police and prosecutors when victims are not able or willing to cooperate and give direct evidence to court. The Inquiry therefore had to consider whether the evidential value of these platforms to the PSNI and PPS outweighed the harm facilitated through them, and whether that harm could be sufficiently mitigated through regulation or only addressed through an outright ban.

Owners and operators of the platforms claim that they proactively share data with police and prosecutorial authorities. In their written evidence to the Inquiry, Vivastreet states:

“Vivastreet supports the APG’s aims of eradicating sexual exploitation in Northern Ireland. We view cooperation with law enforcement as essential to tackling exploitation, and we work closely with police across the UK, and within its constituent countries, to detect potential criminality and proactively refer it to specialist officers.

Vivastreet recognises the importance of ensuring that safeguarding processes are not merely reactive. The platform’s intent is to prevent harm where possible through proactive review and risk-based interventions, and to ensure that potential exploitation is disrupted. Since 2022, we have proactively referred more than 5,000 accounts to the police via our industry-first national referral pathway. In Northern Ireland we received and responded to 12 police requests in 2025, and we separately proactively referred a further 20 cases.”

The PSNI evidence to the Inquiry, both in their written submission and in oral evidence contended that the most constructive way forward would be by regulation of the platforms. They argued that cooperation was vital: banning the platforms

would drive traffickers to the dark web and encrypted apps (such as Telegram). Regulation, the PSNI argued, would ensure that all platforms acted in a consistent manner and would be forced to supply information to the police.

In their evidence, the PSNI suggested that regulation should be introduced to:

- ensure that people uploading advertisements are verified;
- that the ages of people advertised and accessing platforms are verified;
- that platforms are subject to a duty to report trafficking indicators found on their site;
- that a duty is created for data retention, and law enforcement have a right to access data.

The PSNI also suggested that the websites' financial and payment processing facilities should be regulated to ensure anonymous payments are banned. They further argued that regulation should create a mechanism for anonymous reporting, ensuring victims can make reports without fear.

Advocacy groups representing women who advertise on the platforms provided evidence to the Inquiry that websites provide safety and security: for example, women who independently access a website advertising prostitution do not need to be on the street to meet clients and can pre-screen people they contract with prior to meeting. Further, websites advertising prostitution allow women independence to run their own client base, freeing them from control of criminal gangs and men who seek to exploit them. Written evidence from Red Umbrella stated:

"Most sex workers in Northern Ireland today use ASWs to advertise their services. These sites allow people to work more safely and independently without relying on potentially exploitative agencies and managers. They also provide an opportunity for some sex workers to move away from working on the street, which is universally recognised as being a more dangerous place to work."

However, in her evidence to the Inquiry, the UK's IASC countered this view stating:

"[T]he evidence indicates that these perceived safety benefits do not extend to situations of exploitation. Where women and girls are under coercion, control, or third-party management, online environments do not provide greater safety. Instead, the review found that many individuals advertised online do not exercise meaningful control over their profiles, communications, location, pricing, client selection, or earnings. In such circumstances, the appearance of autonomy created by online platforms is misleading."

The Scottish Government, in their policy paper on violence against women and girls, state: "Commercial sexual exploitation, including prostitution, is a form of gendered violence."¹⁰³ Given the Northern Ireland Executive's strong and clear commitment in

the Programme for Government to end violence against women and girls¹⁰⁴, the Inquiry had to consider if this commitment is best met by regulating websites advertising prostitution, or calling for them to be banned entirely.

The arguments put forward by the PSNI and PPS that websites advertising prostitution are valuable in the evidence-gathering process and essential in securing prosecutions are compelling, but the Inquiry notes that the arguments made have previously been considered by the Home Affairs Select Committee in their 2023 report on human trafficking. The Select Committee concluded:

“Websites advertising prostitution significantly facilitate trafficking for sexual exploitation. The threat posed by websites advertising prostitution, the continuing failure of their owners to implement even the most basic safeguards against pimping and trafficking, and the sheer scale of trafficking for sexual exploitation they facilitate, is at total odds with the National Crime Agency and Home Office’s decision to collaborate with them. We found this public partnership working inexplicable, particularly given the total absence of evidence that it has led to a reduction in the scale of trafficking facilitated by these websites”¹⁰⁵

It is of concern to this Inquiry that the PSNI, despite the strong conclusion reached by the House of Commons Select Committee in 2023, continue to collaborate with websites advertising prostitution.

In her oral evidence to the Inquiry Kat Banyard of UK Feminista stated:

“I ‘FOI-ed’ the Home Office for emails between them and [redacted¹⁰⁶] going back to 2018. It was even more shocking than I thought. Throughout this time of open collaboration, [redacted] has continued to allow multiple adverts per account, continued to allow same phone numbers being duplicated across accounts...”

Nordic Model Now, in their written evidence to the Inquiry, stated *“The only way that the risk and scale of sexual exploitation and human trafficking can be reduced is by closing these websites which are the main facilitators and enablers of prostitution and trafficking in the UK.”*

It is the view of the Inquiry that the exploitation and trafficking which is facilitated by websites advertising prostitution outweighs any benefits that the PSNI and PPS have gained by cooperation with the platforms in gathering evidence.

Having considered all the written and oral evidence provided to the Inquiry and having due regard to international studies, parliamentary reports, Select Committee evidence and APG/CPG reports from across the UK, the Inquiry recommends that websites advertising prostitution should be banned throughout the UK and Ireland. The Inquiry concludes that while websites advertising prostitution are not placing the advertisements or controlling the people on their site—and the Inquiry notes they often pass concerning advertisements to the PSNI—they do, however, facilitate trafficking and exploitation. Regulation alone will not remove exploitation from the platforms. It is the view of the Inquiry that criminal operations will still access a regulated platform to exploit vulnerable people. That is why banning the platforms outright is the only way to curb sexual exploitation facilitated online by websites advertising prostitution.

The Inquiry is of the view that a ban will require legislation in the Northern Ireland Assembly, an amendment of the Online Safety Act 2023 and further regulation at Westminster and in the Dáil Éireann. The APG would implore members of the Dáil Éireann to introduce similar criminal offences as recommended in this report, and to regulate in the way recommended to Westminster. This would ensure the island of Ireland acts in unison to end exploitation.

In their evidence to the Inquiry, the PSNI raised concerns that prostitution would be advertised on the dark web or new apps would emerge that are encrypted, further compromising safety. However, if 'darkweb' platforms did emerge, many sex buyers would not be able or willing to access these platforms from fear or lack of capacity. Moreover, the Inquiry considered this evidence and concluded that currently websites advertising prostitution conceal harm and exploitation. It is the Inquiry's conclusion that platforms inflate and create demand. Simply keeping websites advertising prostitution in place, even with regulation, does little to end the harm, given much of that harm is hidden. Some of the platforms researched as part of this report have been operating since the 1990s and harm has not been eliminated by cooperation with law enforcement. Indeed evidence points to the contrary—harm has increased. Given the scale of exploitation, it is the Inquiry's view that banning websites advertising prostitution is the only viable way forward to curb criminal gangs and trafficking.

A. Legislative reform: Northern Ireland Assembly

As discussed in chapter one, earlier this year Paul Frew MLA successfully added an amendment to the Justice Bill which makes it a criminal offence to publish an advertisement which promotes or facilitates the purchase of sexual services, even if that person makes no financial gain. While this amendment represents a significant

step forward in banning websites that advertise prostitution, there may be further legislation that is required to ensure that people who operate these websites face criminal sanction for profiting from a website advertising prostitution.

At the time of writing, the Justice Bill was awaiting the next stage of debate, so the status of this amendment in the longer term was uncertain.

RECOMMENDATION 1

Criminal Offences targeting those who profit from and operate websites

The amendment passed in the recent Justice Bill should be a starting point for reform of the criminal law. The Inquiry recommends that the Department of Justice should build upon that amendment by undertaking a review of the law in Northern Ireland and assessing if further criminal sanctions are required to ensure websites advertising prostitution cease operation in Northern Ireland.

In particular, the Department should assess whether the criminal law is sufficient to ensure that individuals cannot profit from the operation of websites advertising prostitution, and whether the courts have adequate power to seize profits from those engaged in exploitation and trafficking through prostitution advertising.

The review should also examine how to strengthen Northern Ireland's purchase of sex laws to further reduce demand.

RECOMMENDATION 2

Improve Cross-border operational cooperation with the Republic of Ireland

As set out in chapter one, the law in Northern Ireland and the Republic of Ireland is different to that in the rest of the UK. Moreover, given the land border and the separate legal jurisdictions, criminal gangs can easily move a woman from place to place to escape police interaction. Data gathered by the Inquiry in chapter three showed women being moved over the course of a week from Belfast to other parts of Ireland.

The Inquiry recognises that the PSNI and An Garda Síochána already operate the Joint Agency Task Force and share intelligence on cross-border organised crime (including trafficking) on a bilateral, operational basis. Given the very visible and tangible evidence of trafficking across the border, the Inquiry recommends that special focus be given to trafficking for sexual exploitation.

The Inquiry is concerned that, as Northern Ireland has already commenced legislating criminal charges for those who advertise women online, such activity could be displaced from Northern Ireland to south of the border. Given this risk, the Inquiry recommends that the Department of Justice and PSNI consider formalising data-sharing arrangements with An Garda Síochána, so that website operators,

advertisers, and traffickers who relocate their activity south of the border in response to Northern Ireland's legislation can be flagged and tracked rather than lost from view.

RECOMMENDATION 3

Introduction of Sex Trafficking Risk Orders (STROs)

The PSNI, in their evidence to the Inquiry, called for the immediate introduction of Sex Trafficking Risk Orders (STROs) for Northern Ireland. STROs were introduced in England and Wales through the Modern Slavery Act 2015. They have not been brought into force for Northern Ireland, although they have previously been considered as part of the Justice (Sexual Offences and Trafficking Victims) Act (Northern Ireland) 2022¹⁰⁷.

An STRO is a preventive civil order aimed at a person who poses an ongoing risk of trafficking or modern slavery. The court does not need to be satisfied that the person has been convicted of a trafficking offence; rather, it may make an order where the evidence shows, on the balance of probabilities, that the person poses a risk of trafficking others.

The court can impose prohibitions or requirements designed to manage the particular risk posed by the individual.

A court could issue an Order prohibiting a person from:

- advertising another person for sexual services;
- creating or controlling online profiles advertising another person;
- operating or managing accounts on websites advertising prostitution;
- contacting potential victims;
- controlling or receiving payments from people being advertised;
- using particular websites or digital services;
- using particular forms of electronic communication to facilitate exploitation.

The APG recommends that the Department of Justice introduce STROs in Northern Ireland, with particular consideration given to their use in preventing individuals from controlling, advertising or profiting from the sexual exploitation of others through websites advertising prostitution, and in restricting those known to pose a risk of exploitation from engaging in further harmful activity.

B. Regulatory Reform: Westminster

The Northern Ireland Assembly, acting within its devolved competence, lacks the powers to implement online regulation needed to ensure these websites are not only banned in Northern Ireland, but they are also unavailable to be accessed. This will require action by Westminster.

RECOMMENDATION 4

Amendment of the Online Safety Act 2023 to regulate websites advertising prostitution and ensure a ban can be enforced across the UK.

The Inquiry recommends that the UK Government initiate a review of the Online Safety Act and confirm the powers Ofcom already has in relation to these websites. Where gaps exist in the legislative and regulatory framework, the UK Government should amend the law to ensure that Ofcom has the power to order the removal of websites advertising prostitution. This would ensure that websites advertising prostitution could not be accessed in the UK.

Resource Survivors - Better support for survivors of trafficking and exploitation and for those who want to exit prostitution

Streetlight UK estimate that upwards of 90% of people in prostitution in the UK want to leave.¹⁰⁸ But leaving prostitution is rarely as simple as walking away. Housing insecurity, debt, addiction, trauma and coercive relationships can leave women trapped, while some are directly controlled by pimps, traffickers or abusive partners.

Several respondents to the Inquiry called for better support to help those who wish to leave prostitution and for those who are found to have been exploited to get help and support. Nordic Model Now, in their written evidence, stated: *“Sufficient funding needs to be made available to provide specialist services to support women involved in prostitution and exit services to support women who wish to leave.”*

Ugly Mugs Ireland, who operate a safety scheme, told the Inquiry: *“We note there is currently a lack of support services in Northern Ireland for people engaged in sex work. This should be addressed to help prevent abuses including trafficking.”*

CEASE, in their evidence, recommended:

- Improve provision for those who have experienced sexual exploitation and ensure exit services are adequately funded, widely promoted and routinely signposted. Local government, NHS and other frontline professionals should be provided with guidance to ensure individuals involved in prostitution are made aware of available support and exit services without needing to make a specific request.
- Include targeted interventions for men and boys that challenge attitudes underpinning the purchase of sex and promote respectful, equitable and healthy relationships.
- Increase funding dedicated to providing holistic, wrap around exit services.

The Department of Justice (DOJ), in their evidence to the Inquiry, helpfully set out what support is available to victims of modern slavery and human trafficking. The Department’s evidence reinforced the Minister’s commitment to tackling all forms of

exploitation, holding perpetrators to account, and ensuring that the victims of these heinous crimes are supported to recover and rebuild their lives. The Department highlighted that currently:

- Individuals referred into the NRM¹⁰⁹ are entitled to access DOJ funded support, including accommodation, financial assistance, healthcare and counselling. The Department has a statutory responsibility to fund support for adult victims of exploitation, with specialist, trauma-informed, wraparound services for women and their children delivered by its contracted provider, Belfast and Lisburn Women's Aid.
- Victims are supported until either a reasonable grounds or conclusive grounds decision is made. Assistance and support can be extended to a person with a positive conclusive grounds decision for a period of up to 12 months, based on need.

Section 19 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 requires the Department of Health to collaborate across the Northern Ireland Executive to implement a strategy for those wishing to exit prostitution with reviews every three years. The last strategy was published in 2019,¹¹⁰ and reviewed in 2022.¹¹¹ The main achievements of the strategy appear to be the publication of a card with useful telephone numbers and details of support available from Executive Departments/Agencies, and the delivery of an equine therapy pilot for six women.

There is no delivery of bespoke initiatives to help with homelessness, addiction, short term financial needs, counselling support, community therapy, or even mention of online exploitation and help to escape violence and third-party control within the strategy. The Inquiry considers the strategy to be wholly inadequate, falling far below the standard expected when the 2015 Act was passed. Calling for more substantive action when the 2019 strategy was published, Women's Grid commented *"Financial and administrative barriers have meant that the Leaving Prostitution Strategy mandated by the Human Trafficking and Exploitation Act has not noticeably improved access to support for women involved in and leaving prostitution outside of the National Referral Mechanism for human trafficking victims."*¹¹²

RECOMMENDATION 5

An updated, properly funded, strategy for leaving prostitution to be published by the Department of Health that provides proper support for those wanting to leave prostitution and specifically addresses exploitation online, including individual advocacy support to help victims navigate the criminal justice system

When it introduced s.19 of the 2015 Act, the Assembly clearly believed the Department of Health would have more ambition than what has been implemented to date. The Inquiry recommends that the Department of Health urgently review the

2019 strategy and bring forward proposals which are more ambitious than merely signposting people to support services already available. The Inquiry recommends that a new strategy should set out how policing, the Public Prosecution Service, Executive Departments, other agencies, and civic society can co-ordinate in a joined-up way to ensure people receive the support they need. The strategy must provide clear pathways out of prostitution and these pathways must be properly funded across Executive Departments. Any updated strategy must include specific schemes to deal with the harm from online exploitation.

The Inquiry heard from one victim who said, *“I wasn’t given counselling, I wasn’t given support, nothing at all until I put a video out on TikTok telling my story.”* This witness recounted how the specialist PSNI team dealing with her case were the first to treat her with dignity and respect, but they were not resourced to provide her with the support she needed to navigate the fear she felt working through the criminal justice system.

Having listened to her evidence and read the stories of other victims, the Inquiry recommends that victims are provided with individual specialist advocacy support to navigate the criminal justice system and to ensure that the victim has someone to speak to and advocate for them as they face ongoing threats and intimidation from people who were involved in their exploitation.

Any new strategy must be backed by ringfenced funding to ensure people who wish to leave prostitution are facilitated to do so.

Consideration should be given to creating/funding an organisation to provide dedicated individual support and advocacy for women who have been sexually exploited, similar to Ruhama which operates in the south. Any new funding should link with groups that already provide support to build better services and create a pathway to better outcomes.

RECOMMENDATION 6

Department of Justice to assess if a statutory disregard scheme for those convicted of the offence of loitering and soliciting for the purposes of prostitution is needed for Northern Ireland and, if appropriate, bring forward proposals to ensure people are not hindered by past convictions.

Section 15 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (NI) 2015 repealed Article 59 of the Sexual Offences (NI) Order 2008 (loitering and soliciting for the purposes of prostitution). This means that since 2015, no person could be convicted in Northern Ireland for selling sexual services. The Act did not include a provision to repeal or disregard historic convictions.

In 2016, the House of Commons Home Affairs Committee recommended that *“The Home Office should also legislate for the deletion of previous convictions and cautions for prostitution from the record of sex workers”* on the basis that such

records are “a significant barrier to exiting prostitution or gaining employment.”¹¹³ In 2021, the office of the IASC, in conjunction with the University of Nottingham, established an evidence base that contact with the criminal justice system, including a retained criminal record, is a recognised barrier to survivors of modern slavery, preventing them from reintegrating into work.¹¹⁴

In the Republic of Ireland, the then Justice Minister announced plans to bring forward such a scheme in 2021.¹¹⁵ However, the scheme has not been enacted as yet.¹¹⁶

Evidence to the Inquiry from Witness A described how she had no meaningful control over her advertisement, earnings, or contact with the men purchasing sex. Given this powerless position, it is clear such a person is a victim of coercive control.

The APG is concerned that historic convictions handed down before 2015 only serve to prevent someone from fully freeing themselves from the exploitation they have been subjected to. The law should punish the conduct of those who exploit, while protecting those who are victims of that exploitation.

The Inquiry has carefully considered the IASC’s research. Her report stated: “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.”¹¹⁷

To address the concerns raised by survivors, the Inquiry recommends that the Department of Justice review how many people in Northern Ireland were convicted of solicitation offences repealed in 2015, and following that review the Inquiry recommends that the Department introduce a disregard scheme if the review deems it necessary.

RECOMMENDATION 7

Targeted interventions for men and boys that challenge attitudes underpinning the purchase of sex and promote respectful, equitable and healthy relationships.

The Inquiry’s evidence establishes that these platforms do not simply meet existing demand; they actively shape and expand it. The Inquiry’s own research, and evidence received from others, highlights that features such as searchable profiles and preference filtering allow buyers to pick women from a menu of sexual preferences, treating the women advertised as commodities rather than people. In reviewing the Inquiry’s own evidence, it is clear that the design of platforms is used to inflate demand by offering buyers an almost unending supply of women to select between. There is clearly an attitudinal dimension that needs to be addressed. It is the opinion of the APG that websites advertising prostitution do not promote respectful, equitable and healthy relationships. Legislation alone will not shift attitudes.

Northern Ireland already criminalises the purchase of sexual services under the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. The APG considers that this legislative position is only as effective as the social attitudes operating alongside it. A ban on the platforms that currently supply and normalise this demand should therefore be paired with prevention work aimed at those who purchase or are considering purchasing sex. Moreover, boys in our society need education and support. The world around them often promotes toxic attitudes which can translate into inappropriate behaviour.

The Inquiry recommends that the Department of Education, in conjunction with The Executive Office and Department of Justice, jointly develop targeted programmes for men and boys addressing the attitudes evidenced in this report. This support is an important part of delivering the Executive's VAWG strategy.

Equip the Police to ensure they have the tools to prosecute those responsible for trafficking and exploitation

The PSNI and PPS told the Inquiry that websites advertising prostitution can provide valuable evidence in trafficking investigations and prosecutions. If these platforms are prohibited, law enforcement must therefore be prepared to gather the same intelligence and evidence through alternative means.

RECOMMENDATION 8

Mandatory training for frontline police and support agencies to ensure the most up-to-date investigatory techniques are employed to combat trafficking for sexual exploitation

The PSNI's evidence to the Inquiry highlighted the success of Operation Liverless, in which information supplied by websites advertising prostitution was described as *"vital to securing two trafficking convictions without the cooperation of victims."* This demonstrates the extent to which these platforms have become embedded in current investigatory practice. Any move to prohibit them will therefore require alternative methods of gathering intelligence and evidence.

The APG commends the PSNI and PPS for the work they have undertaken in securing prosecutions with evidence supplied by websites advertising prostitution. However, the fact prosecutions were secured is not, in the APG's opinion, a reason to preserve the infrastructure that produces and facilitates trafficking and sexual exploitation. Instead, the PSNI and PPS should be supported to develop investigatory and prosecutorial techniques that do not depend on the continued existence of websites advertising prostitution. The Inquiry recommends that the PSNI are resourced and trained to utilise new powers under the Crime and Policing Act 2026, as set out in chapter one¹¹⁸, to strengthen evidence gathering to ensure that business

disruption measures under that legislation can be employed, with the use of industry leading technology, to remove websites advertising prostitution and disrupt their business model.

The Inquiry therefore recommends dedicated training and transitional support for the PSNI and PPS ahead of the new criminal sanctions as proposed by Paul Frew MLA in the Justice Bill taking effect. Removing an evidential source currently used by investigators without preparing for its absence risks creating a gap in investigatory capacity at precisely the point when offending may move away from these platforms.

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Chapter 1: The Legal and Regulatory Framework Governing Websites Advertising Prostitution in the UK and Ireland

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Appendix 2: Inquiry Terms of Reference: Regulation of Websites Advertising Prostitution

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APPENDIX 1

Members of the All-Party Group on Modern Slavery and Sexual Exploitation

CHAIR	Peter Martin MLA
VICE CHAIR	Connie Egan MLA
SECRETARY	Brian Kingston MLA
TREASURER	Harry Harvey MLA
MEMBERS:	Diane Forsythe MLA Paul Frew MLA Cara Hunter MLA Colin McGrath MLA Kate Nicholl MLA

APPENDIX 2

Inquiry Terms of Reference: Regulation of Websites Advertising Prostitution

About the APG

The All-Party Group (APG) on Modern Slavery and Commercial Sexual Exploitation was re-established in January 2026 to address the harms to victims of modern slavery and commercial sexual exploitation, who are predominantly women and girls.

The purpose of the APG is to ensure that the Northern Ireland Assembly is seeking to reduce human trafficking and commercial sexual exploitation and that victims of these crimes are given the help and support they need; to encourage debate and discussion between MLAs, external agencies, and public services to raise awareness about the issue and to find solutions.

Background to Inquiry

The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 represented a key milestone in the protection of women and girls from exploitation and prostitution. Since then, websites which advertise prostitution have come under increasing scrutiny as facilitators of pimping and commercial sexual exploitation. These sites are also known as 'Adult Services Websites (ASW)' or 'pimping websites'.¹¹⁹

Although we do not have specific numerical data on the use of websites advertising prostitution in Northern Ireland, evidence from the rest of the UK and the Republic of Ireland suggests that this is a growing issue. For example, The SERP Institute has conducted research into these sites, primarily in the Republic of Ireland but also considered Northern Ireland, given that these websites operate across the border. Their research suggests that the exploitation of women and girls online is a growing threat.

A key draw of these websites is the anonymity they provide. The SERP Institute stated: *"Having selected their chosen woman, buyers need only supply a first (often fake) name over the phone when 'booking', while pimps and traffickers can easily remain anonymous and avoid detection by law enforcement by advertising their victims as 'independent escorts' to create the illusion of free will".*¹²⁰ SERP also suggest that these sites know, or are grossly negligent to the fact that, women are being exploited on their platforms.¹²¹

In 2021, in Scotland, the Cross-Party Group on Commercial Sexual Exploitation published an inquiry on ‘sexual exploitation advertising websites’.¹²² Their inquiry looked at how sex trafficking and exploitation were being facilitated online and made a number of recommendations for actions that the Scottish Government should take. The Head of Police Scotland’s National Human Trafficking Unit told the inquiry that *“Adult Services Websites are one of the main facilitators of trafficking for the purposes of sexual exploitation in Scotland and the rest of the UK”*.¹²³ To date in Northern Ireland we have not undertaken a similar study. In September 2025, the UK Independent Anti-Slavery Commissioner announced an inquiry into websites which advertise prostitution which seeks to *“understand and prevent the trafficking and sexual exploitation of women and girls via adult services websites in the UK”* and *“uncover how these platforms are used to facilitate harm and to recommend stronger protections for vulnerable individuals”*.¹²⁴

Those who support and operate websites which advertise prostitution argue that they provide women with safety, autonomy and greater financial control over their services.¹²⁵

This APG inquiry will seek to build on the above research and consider the prevalence of sex trafficking and exploitation facilitated online in Northern Ireland and consider how we can better protect people and disrupt exploitation and human trafficking. A report, based on the written and oral evidence, will be produced which will make recommendations to the Northern Ireland Executive.

Scope of the inquiry

The inquiry will seek to address three main questions:

1. Do these platforms operate and profit from exploitation in Northern Ireland?

We aim to understand how these sites function within Northern Ireland’s unique context, including the implications of an open border with the Republic of Ireland. This includes examining how their business models may enable exploitation and assessing what protections, if any, they offer to women and girls in Northern Ireland. The claim that they provide safety and financial control to those using the platforms will be assessed. We will also explore whether the way these platforms operate differs from other jurisdictions, particularly given Northern Ireland’s cross-border dynamics.

2. What is the scale and nature of the harm caused in Northern Ireland?

We will seek to uncover the prevalence of exploitation on websites advertising prostitution which can be accessed in Northern Ireland by using the Sexual Trafficking Identification Matrix (STIM). This follows the research conducted by SERP. Developed by the University of Sheffield, STIM is used in assessing adverts on websites by analysing features of the adverts, such as language and photographs, to produce a rating to decide if there is a low, medium or high risk that the women advertised are potential victims of human trafficking and sexual exploitation.

3. Where are the gaps in our legal and regulatory framework?

Northern Ireland's legislative landscape on sexual exploitation includes the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (2015), which introduced the Nordic Model by criminalising the purchase of sex, and the Justice (Sexual Offences and Trafficking Victims) Act (2022), which strengthened protections against grooming, cyber-flashing, and image-based abuse. However, these laws primarily target individual offenders and trafficking networks rather than the digital platforms that facilitate commercial sexual exploitation. There is currently no dedicated offence for operating or moderating websites that enable prostitution or sexual exploitation.

Call for evidence: 19 January 2026-2 March 2026 (5pm)

Organisations and individuals are invited to make written submissions to the APG at apg.cse.inquiry@gmail.com by 5pm on 2 March 2026.

- In your experience, what are the potential links between websites advertising prostitution and the recruitment, coercion, or trafficking of women and girls into sexual exploitation?
- Are there aspects of websites advertising prostitution that require tighter regulation or prohibition in Northern Ireland in order to reduce the risk and scale of sexual exploitation and human trafficking?
- What type of regulatory framework is needed to protect vulnerable individuals — particularly women and girls — from sexual exploitation and human trafficking facilitated through websites advertising prostitution in Northern Ireland?
- Do websites advertising prostitution provide financial benefits and safety to those advertised on the platform? If so, how?
- Should high-risk services — such as those involving anonymous transactions, unverified user-uploaded content, or live streaming — be restricted or banned due to their association with trafficking and exploitation, why and how?
- What is the impact of social media and targeted online advertising in increasing visibility and demand for exploitative sexual services, and how does this contribute to trafficking risks?
- If websites advertising prostitution are permitted to operate, what safeguards and regulatory measures are necessary to minimise harm and prevent trafficking?
- What are the effects of early exposure to websites advertising prostitution on children and young people?
- What international best practices have proven effective in preventing trafficking and exploitation on online websites advertising prostitution, and what legal, social, or political barriers might limit their adoption in Northern Ireland?
- How should the Leaving Prostitution Strategy be updated and implemented to support victims and women who are seeking to leave websites advertising prostitution?

APPENDIX 3

Oral and Written Evidence Received

The APG thanks the following organisations for submitting written evidence:

- Beige Bear Ltd
- Centre to End All Sexual Exploitation (CEASE)
- Department of Justice
- European Sex Workers' Rights Alliance
- Independent Anti-Slavery Commissioner (UK)
- Invisible Traffick
- The Migrant Workers' Union NI
- Nordic Model Now
- Ofcom
- Police Service of Northern Ireland
- Public Prosecution Service
- Red Umbrella Éireann
- Ugly Mugs Ireland
- Ulster University – Dr Gillian Kane and Emma Richmond
- Vivastreet

All written evidence submitted is retained by the APG and is available on request. To request access to written evidence please email apg.cse.inquiry@gmail.com

In addition, a number of oral evidence sessions were held between April and June 2026. The APG thanks the following individuals and organisations for attending:

- Ruth Breslin – Sexual Exploitation Research and Policy Institute
- Kelda Crawford McCann – Managing Director Strident Media
- Witness A
- Katherine Banyard – Head of Programme (Commercial Sexual Exploitation) UK Feminista
- Lucy Smith – Ugly Mugs Ireland
- Police Service of Northern Ireland

Transcripts of the sessions are retained by the inquiry. To request access to a transcript of an oral session referred to in this report please email apg.cse.inquiry@gmail.com

**The Northern Ireland Assembly All-Party Group
on Modern Slavery and Commercial
Sexual Exploitation**



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