

APG on Modern Slavery and Commercial Sexual Exploitation

Inquiry Terms of Reference: Regulation of Websites Advertising Prostitution

About the APG

The All-Party Group on Modern Slavery and Commercial Sexual Exploitation was recently re-established to address the harms of modern slavery and commercial sexual exploitation to victims, 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'.¹

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 Sexual Exploitation Research and Policy Institute (SERP) 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. SERP 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"*.² SERP also suggest that these sites know, or are grossly negligent to the fact that, women are being exploited on their platforms.³

In 2021, in Scotland, the Cross-Party Group on Commercial Sexual Exploitation published an inquiry into sexual exploitation on 'sexual exploitation advertising websites'.⁴ Their inquiry looked at how sex trafficking and exploitation was 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"*.⁵ 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"*.⁶

Those who support and operate websites which advertise prostitution argue that they provide women

with safety, autonomy and greater financial control over their services.⁷

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 make recommendations on how we can better protect people and disrupt exploitation and human trafficking.

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

Organisations and individuals are invited to make written submissions to the APG that address all or some of the following issues:

- 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?

A call for written evidence will open on 19th January 2026 and will remain open for a period of 6 weeks, closing on 2nd March 2026. Please send written evidence to apg.cse.inquiry@gmail.com.

Report

A report, based on the written and oral evidence, will be produced to make recommendations to the Northern Ireland Executive.

References

- 1 House of Commons Home Affairs Select Committee, Human Trafficking, First Report of Session 2023–24 8th December 2023, pg. 25 <https://committees.parliament.uk/publications/42482/documents/211207/default/>
- 2 The Sexual Exploitation Research and Policy Institute (SERP), Commercial sexual exploitation: The impact of technology Insights from the Irish sex trade, September 2024, pg. 6 https://serp.ie/wp-content/uploads/2024/09/SERP_Briefing_Commercial-sexual-exploitation-The-impact-of-technology_FINAL-1pg.pdf
- 3 Ibid.
- 4 Cross-Party Group on Commercial Sexual Exploitation, Online Pimping, An Inquiry into Sexual Exploitation Advertising Websites, 2021, <https://www.appg-cse.uk/wp-content/uploads/2021/03/Online-Pimping-CPG-report.pdf>
- 5 Ibid, pg.12
- 6 Independent Anti-Slavery Commissioner, Adult Services Websites Regulation, <https://www.antislaverycommissioner.co.uk/reports-and-resources/strategic-initiatives-research-projects/adult-services-websites-regulation/>
- 7 Written evidence submitted by Decrim Now to the House of Commons Committee on the Crime and Policing Bill (CPB52) Crime and Policing Bill (24th April 2025)