



9 December 2025

Dear Convener,

Thank you again for the opportunity to give evidence to the Committee on 26 November. I am grateful for the careful scrutiny that Members have undertaken throughout Stage 1. As I indicated at the meeting, I undertook to provide further written information. I also wish to address several points raised during evidence sessions, including the session with the Minister on 19 November.

1. Engagement with stakeholders and lived experience

Throughout the development and scrutiny of the Bill I have engaged extensively with justice partners, front-line services, specialist organisations, survivors of prostitution, and women currently involved in prostitution. This includes multiple meetings with Police Scotland, the Crown Office and Procurator Fiscal Service, the Law Society of Scotland, the Women's Support Project, Routes Out, TARA, front-line services, and a wide range of academic and professional experts.

The Committee also facilitated two confidential sessions with women with lived experience. In addition, two further letters were sent directly to the First Minister by women who wished their views on the Bill to be considered. Taken together, these represent a breadth of lived experience and include a range of views. All of them have informed my approach to refinements at Stage 2.

2. Addressing concerns about safety and harm

I recognise that concerns have been raised that criminalising sex buyers could increase risks and I have reflected them in the refinements I intend to bring forward. However, the Committee has not received verifiable evidence from any jurisdiction operating this model that violence against prostituted women increased as a result of criminalising buyers. The international research base, including Sweden, Norway, France and Canada, does not show a causal increase in harm.

Scotland's own experience is also relevant. For the past 18 years, kerb-crawling and certain forms of purchaser behaviour have been criminalised under the Prostitution (Public Places) (Scotland) Act 2007, enforced at various points with considerable vigour. Over that period, no evidence has emerged of increased violence against women attributable to that partial criminalisation of buyers. If such an effect had occurred, it would undoubtedly have been raised prominently, given the local nature of that legislation.

In considering concerns about safety, it is also important to take account of the role of organised crime within the sex trade. Evidence from Scotland highlights this clearly: in the 2024 Encompass snapshot, of the 58 women for whom information was available, 15 reported links to organised crime. This aligns with broader European assessments. Europol's 2021 Serious and Organised Crime Threat Assessment noted that more than 80 per cent of criminal networks use legal business structures, and that sexual exploitation is particularly prevalent in jurisdictions where prostitution has been legalised.

International evidence demonstrates that the supposed 'underground' said to result from the Nordic Model in fact exists most clearly within commercialised systems, like Germany, Belgium or the Netherlands, where organised crime embeds itself inside brothel structures and trafficked or coerced women are exploited behind a façade of legitimacy. A clear buyer-offence is therefore a preventative and disruptive measure.

The evidence paper I am providing alongside this letter examines in detail the claims made during oral evidence regarding safety and alleged increases in violence under Nordic-model laws. It analyses the studies relied upon by opposing witnesses and sets out why those studies do not support the conclusions that were presented to the Committee. The European Court of Human Rights, in a 2024 judgment concerning France, carefully considered the same safety arguments and rejected them in full, finding no evidential basis for the assertion that criminalising sex buyers increases harm to prostituted women. I hope this reassures Members that the Bill does not increase risk and that **shrinking the market is itself protective**.

3. International evidence on enforcement

Following my appearance, I noted that the Committee had received written submissions from An Garda Síochána, the Police Service of Northern Ireland, the Public Prosecution Service for Northern Ireland, the Swedish Police Authority and the Swedish Prosecution Authority. These submissions provide helpful clarity on several points raised during oral evidence.

All jurisdictions emphasise that enforcement approaches evolve over time; that cultural change and deterrence are central to the model's effect; and that evidential challenges are not unique to prostitution but mirror those common to private sexual offending more broadly. Importantly, the submissions confirm that criminalising buyers is workable and enforceable when properly framed. They also validate the approach taken in Scotland to define the offence as complete at the point of agreement to pay, which avoids weaknesses identified elsewhere.

4. Clarifying enforcement in Scotland

I have met with the Lord Advocate, COPFS and Police Scotland to scrutinise the wording of section 1 carefully. Established evidential routes exist and are already used in comparable offences: digital communication, screenshots, payment traces, surveillance, admissions, and third-party testimony.

The offence has also been intentionally drafted to avoid the limitations that have hampered enforcement in other jurisdictions. The inclusion of a reasonable-inference test reflecting established Scots law principles strengthens enforceability and ensures police do not need to rely solely on witness statements from women, though such statements may be used where appropriate and safe.

The Committee has today received a letter from the Lord Advocate, which I welcome. She confirms that section 1 is “clear” and “both enforceable and workable from a prosecutorial perspective”. Her letter also reiterates that evidential challenges of the kind raised during oral evidence are not unique to this context and, “though significant, are not insurmountable”. I note in particular her view that the offence is complete at the point of agreement to pay for the sexual act, and that alternative evidential routes – including phone analysis and surveillance – will be central to enforcement. The Lord Advocate’s observations reflect the discussion at our meeting on 6 November and provide helpful reassurance to the Committee about the practicality of the offence.

Her letter also emphasises that prostitution must be considered within the broader context of public interest and societal harm. That framing aligns closely with the Bill’s preventative purpose: addressing root offending behaviour, reducing exploitation, and tackling patterns of male violence that extend well beyond prostitution itself.

Her letter also highlights the strong links between prostitution, domestic abuse and other male-violence offending patterns, which reinforces the Bill’s preventative and public-protection aims.

5. Support and exiting

There has been significant consensus in favour of the statutory right to support. Although the detail rightly sits in regulations developed by Ministers, the Financial Memorandum sets out a realistic and evidence-based estimate. Services in Scotland, Ireland and elsewhere all converge on staffing models and costings of approximately £1 million per year for national provision.

The Bill requires that support be available to anyone who seeks it, without conditionality, and recognises that exiting prostitution is often a non-linear process. A separate Christie-based public-value paper that I am providing alongside this letter sets out why this level of investment should be understood as preventative spending that reduces much larger long-term costs to health, justice, homelessness and violence-against-women services.

6. Legislative improvements for Stage 2

During scrutiny I have listened carefully to concerns raised by the Committee, justice partners, survivors and service providers. I will therefore bring forward a series of amendments at Stage 2 that strengthen and refine the Bill. These will include:

- replacing automatic quashing with an automatic pardon and voluntary disregard process, which better reflects trauma-informed practice and judicial independence while achieving the same policy aim
- refining the definition of “sexual act” to ensure clarity and consistency with established Scots law and to support enforceability
- addressing technical sentencing matters raised by the Law Society and COPFS

These changes respond directly to concerns raised during evidence and reflect lessons learned from other jurisdictions.

7. Purpose of the Bill and the preventative-spend case

The law has normative, declarative, preventative, protective and deterrent functions. International experience demonstrates that these operate even where enforcement is uneven, and that reducing demand shrinks the market and therefore the scale of harm. The Bill was drafted with the weaknesses identified in earlier legislative models firmly in mind, and the refinements I will bring forward are informed by engagement with justice agencies and stakeholders throughout Stage 1.

The accompanying Christie-based public-value paper outlines the wider fiscal context. Violence in prostitution alone is estimated to cost Scotland around £382.6 million per year, with lifetime public-sector harm per woman in prostitution in the region of £300,000 – £350,000. Independent evaluations from Glasgow and Ipswich show that specialist services can return around £6 for every £1 invested and that coordinated exit strategies can reduce criminal-justice costs by more than half. In that context, the Bill’s estimated recurring cost of approximately £1.4 – £2.2 million per year represents a modest, Christie-aligned preventative investment.

At the Committee’s request, I am also enclosing two short annexes providing (A) comparative homicide information under different legal frameworks and (B) a summary of the major international studies on trafficking inflows. A visual explanatory pyramid illustrating the structure of the prostitution market, referred to in oral evidence, is also attached to the email.

I remain committed to working with the Committee and with colleagues across Parliament to ensure the Bill delivers a clear, workable and effective framework that aligns with Scotland’s commitment to tackling violence against women and girls.

Yours sincerely,



Ash Regan MSP, Edinburgh Eastern

ANNEX A – Homicide Data and Comparative Analysis

1. Introduction

This annex provides the homicide-rate analysis requested by the Committee.

The comparative data and charts used here are drawn from the Nordic Model Now (NMN) analysis published in 2023 and titled “MYTH: The Nordic Model is more dangerous for sex workers than decriminalisation” (Available at: <https://nordicmodelnow.org/myths-about-prostitution/myth-the-nordic-model-is-more-dangerous-for-sex-workers-than-decriminalisation/>)

Homicide data are used because, as NMN states, “a dead body that has met a violent end is an unarguable fact.” Other forms of violence suffered by women in prostitution are heavily under-reported, inconsistently recorded, and influenced by institutional awareness and police practices. Homicide is therefore the clearest available indicator to test the claim made in oral evidence that criminalising buyers increases harm.

2. Why homicide data is a legitimate test of the claim

Opponents of the Nordic Model assert that criminalising buyers pushes prostitution “underground,” increases danger, and causes more violence against prostituted women. If this were true, then rates of the most extreme form of violence—murder—should also rise.

The logic is straightforward:

- If buyer-criminalisation increases violence, then homicide should increase.
- If homicide does not increase—and is instead lower—this directly contradicts the claim.

This annex therefore examines the comparative homicide rates for prostituted women across:

- Nordic-model jurisdictions (Sweden, Norway and France) and
- Commercialised systems (Germany, The Netherlands and New Zealand).

3. Summary of findings

The data show:

- Lower homicide rates in Sweden, Norway, and France (Nordic Model)
- Higher homicide rates in Germany, New Zealand, and the Netherlands (commercialised systems)
- Zero murders of prostituted women linked directly to prostitution in Sweden over the period examined

- The highest documented homicide rates in New Zealand and Germany, where prostitution markets are markedly larger

These findings do not establish causation. But they do directly rebut the claim that buyer-criminalisation increases lethal violence.

NMN emphasizes that “This shows that the claim that the Nordic Model is more dangerous for women involved in prostitution is false.”

4. Interpretation

This analysis cannot prove that commercialisation causes violence. However, it can demonstrate the following three points with confidence:

(1) The Nordic Model does not increase homicide. If buyer-criminalisation increased risk, the homicide rate would reflect it. It does not.

(2) Commercialised systems have larger prostitution markets and higher absolute harm. As NMN notes: “The more prostitution there is, the more women will be harmed in it – sometimes fatally.” The pattern is consistent across Germany, New Zealand, and the Netherlands.

(3) The most plausible explanation is market size. Where markets expand (commercialisation), more women are exposed to violent buyers. Where markets contract (Nordic Model), exposure decreases. This is consistent with:

- econometric work (Cho, Dreher & Neumayer 2013; Jakobsson & Kotsadam 2013)
- criminological theory on opportunity and target population size
- national evaluations in Sweden (SOU 2010:49) and France (2024 ECHR case submissions)

Again, this is correlation, not proof of causation. But it directly falsifies the claim that the Nordic Model increases violence.

5. The homicide data (NMN dataset)¹

Table: Annual average number of homicides of prostituted women per 100,000 female population

Country	Legal System	Since	Female Population (avg)	Time in yrs	Murders	Annual Murders per 100k
Germany	Commercial	2002	41,658,647	21	102	0.012
Norway	Nordic Model	2009	2,535,321	14	1	0.003
Sweden	Nordic Model	1999	4,700,175	24	0	0
New Zealand	Commercial	2003	2,235,863	20	9	0.02
France	Nordic Model	2016	33,118,688	7	14	0.006
The Netherlands	Commercial	2000	8,666,917	23	29	0.015

NMN notes on the data that:

- The figures represent murders directly connected to prostitution.
- Female population is the average female population during the years studied, not 2023 alone.
- Homicides are likely under-recorded, particularly in commercialised systems where law-enforcement practice explicitly avoids recording prostitution-linked murders “to reduce stigma.”
- Sweden recorded two murders of prostituted individuals during the period: one woman and one trans-identifying person, but NMN excluded them because they were not directly tied to prostitution activity.
- And that again, the analysis is not causal, but it directly rebuts the claim that buyer-criminalisation increases lethal violence.

6. Conclusion

The claim that the Nordic Model increases violence is not supported by homicide data. The evidence instead demonstrates lower levels of lethal violence under demand-reduction models, and higher levels of lethal violence in commercialised systems with larger prostitution markets.

This aligns with broader criminological and economic evidence: market size predicts harm. Commercialisation expands markets. Demand-reduction contracts them. The homicide data therefore provide a clear and factual rebuttal to the assertion made to the Committee that the Nordic Model increases violence against women involved in prostitution.

¹ Source: Nordic Model Now, using Sex Industry Kills project data and UN Population Division figures.

ANNEX B – Summary of Major International Studies on Trafficking Inflows

1. Purpose of this annex

This annex summarises the major international studies examining trafficking inflows under different prostitution law frameworks.

Only studies that directly assess trafficking inflows, market size, or the relationship between legal regimes and trafficking prevalence are included.

2. Summary of the international evidence

Across multiple large-scale comparative studies, a consistent pattern emerges:

- Commercialised systems, e.g. Germany, the Netherlands, New Zealand)
→ higher trafficking inflows, larger markets, and greater involvement of organised crime.
- Nordic Model, e.g. Sweden, Norway, France)
→ lower trafficking inflows and reduced profitability and feasibility for traffickers.
- The central mechanism identified across studies: *Demand drives the trafficking market; reducing demand reduces the incentive for traffickers.*

This pattern appears repeatedly across the best-quality international evidence.

3. Major studies on trafficking inflows

Below is a concise list of the principal studies, each of which directly analyses trafficking inflows or trafficking prevalence under different legal models.

Cho, Dreher & Neumayer (2013) – World Development
150-country econometric analysis.

Finding: Legalised prostitution regimes have significantly higher trafficking inflows. Demand-reduction regimes reduce profitability and therefore inflows.

Jakobsson & Kotsadam (2013) – European Journal of Law and Economics
Cross-national comparison of prostitution laws and trafficking for sexual exploitation.

Finding: Countries that criminalise buyers experience substantially lower trafficking inflows than commercialised systems.

European Commission (Armstrong et al., 2016) – Gender Dimension of Trafficking

EU-wide analysis using law-enforcement and victim-identification data.

Finding: Prostitution markets expand under commercialisation, creating conditions that increase trafficking uptake. Demand-reduction frameworks make countries less attractive to traffickers.

European Parliament (Di Nicola, 2021) – Cross-border impact study
Comparative review across Member States.

Finding: “Increasingly available evidence” shows that criminalising sex buyers reduces trafficking inflows, while legalised systems show higher levels of cross-border trafficking.

Hedlin (2016) – University of Michigan Journal of Law Reform
Development of the Prostitution Law Index, measuring legal regimes against trafficking outcomes.

Finding: Movement toward buyer-criminalisation correlates with lower inflows; legalisation expands markets and increases trafficking.

MacKinnon & Waltman (2025) – Harvard International Law Journal
Legal-human rights analysis.

Finding: Legalised systems systematically generate greater trafficking inflows due to scale, profitability, and impunity of controllers. Demand-reduction laws align more closely with anti-trafficking obligations.

4. Supporting empirical context

Although not trafficking-inflow studies per se, the following findings reinforce the mechanism identified in the literature:

- **ILO 2024:** Forced commercial sexual exploitation yields 73% of total global illegal forced-labour profits, making prostitution the most profitable trafficking sector.
→ Profitability makes demand-reduction central to prevention.
- **EU Commission 2016;** Swedish & Norwegian evaluations: Demand-reduction laws reduce the scale of prostitution markets, thereby reducing opportunities for traffickers.

- **National evidence (Germany, New Zealand):** Commercial sex venues in commercialised regimes create conditions where abuse and trafficking are harder to detect and more difficult to police.

These reinforce rather than replace the main inflow studies.

5. Conclusion

Taken together, the major international studies show a consistent and robust pattern:

- Legalisation and full decriminalisation **increase trafficking inflows** by expanding markets.
- Criminalising buyers **reduces trafficking inflows** by shrinking demand and limiting profitability for traffickers.
- No study finds trafficking inflows **reduced** by commercialisation.

This aligns with the core principle expressed across European and international evaluations:

Reducing demand reduces trafficking.

References

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Jakobsson, N., and Kotsadam, A. (2013). “The Law and Economics of International Sex Slavery: Prostitution Laws and Trafficking for Sexual Exploitation.” *European Journal of Law and Economics*, 35(1), pp. 87–107.

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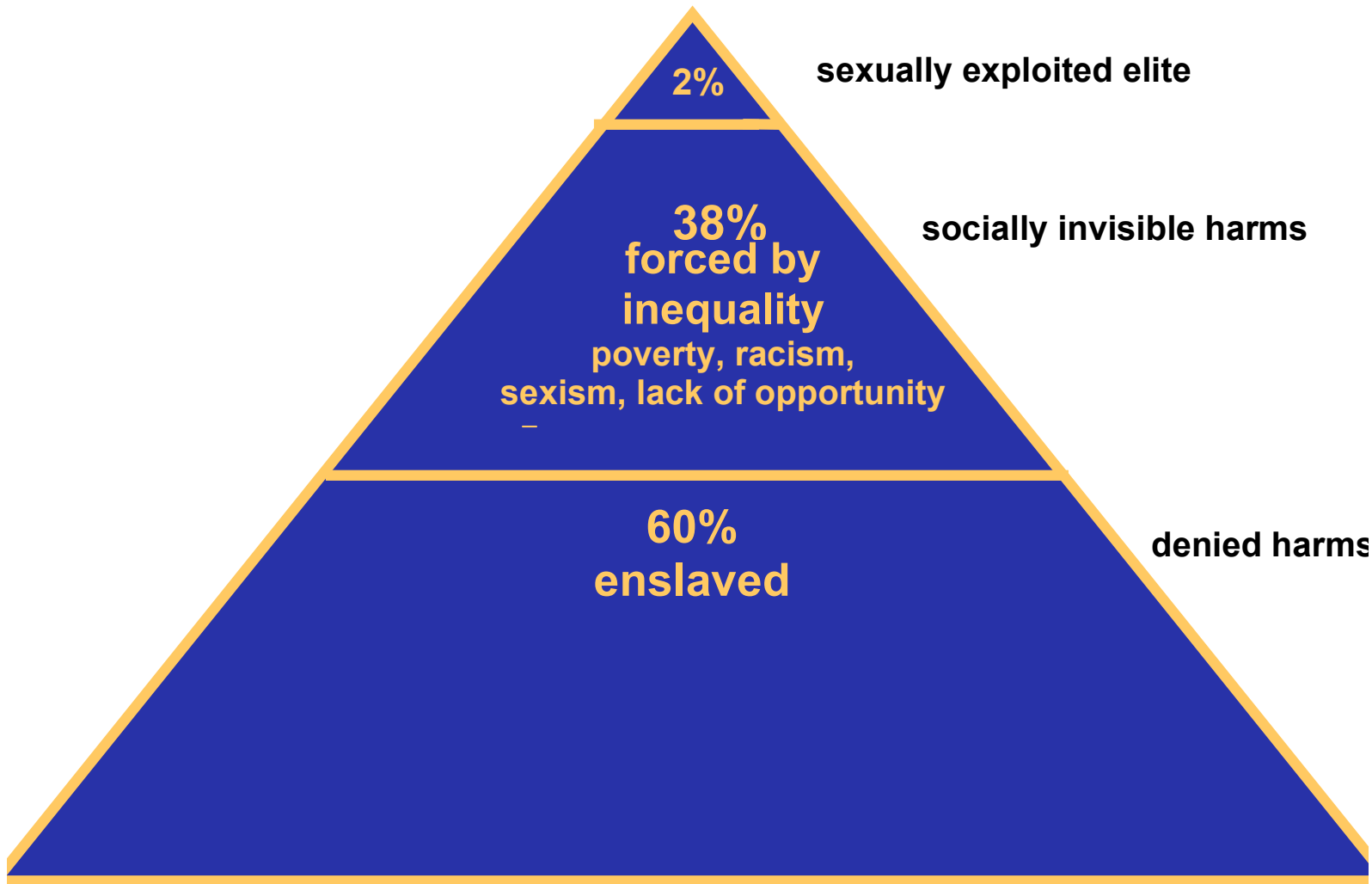
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Prostitution's Hierarchy of Coercion



There is a pyramid-like hierarchy in prostitution. At the top are a very few women - only about 2% of all those in prostitution - who service a few men for a lot of money in a short period of time in their lives - and then they get out, or are bought by one man who supports them.

In the middle section of the pyramid are women who need the money, who have had the option of sexual exploitation as a survival mechanism made very real to them by a history of incest or childhood sexual abuse, and who may face an emergency situation such as escaping a violent partner, losing a job, or having children with special needs. These are about 38% of all those in prostitution.

The farther you descend in the hierarchy, the greater the numbers of women in prostitution, and the less meaningful any discussion of choice is for them. At the bottom of the hierarchy are the largest number of women in prostitution, about 60%. These are the poorest people in prostitution. They have enormously restricted life choices. Many of these women have been physically coerced into prostitution.

Sources are from a large number of peer-reviewed scientific studies, from agencies who offer direct services to those in prostitution and to those who seek to escape it, and from policy experts.

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Christie Commission based proposition

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A Public-Value Case for Investment in tackling commercial sexual exploitation of prostitution in Scotland via the Prostitution (Offences and Support) (Scotland) Bill



The "Christie Commission" (Scotland)	2
Applying Christie to Commercial Sexual Exploitation.....	2
Prevention of prostitution - stop exploitation before it starts.....	3
Christie Principle:	3
Justification	3
Investment Proposition:	3
Protection - support victims and those at risk.....	4
Christie Principle	4
Justification:	4
Investment Proposition:	4
Prosecution - pursuing exploiters and perpetrators	5
Christie Principle	6
Justification:	6
Investment Proposition:	6
Partnerships - pursue whole-system collaboration	7
Christie Principle	7
Justification	7
Investment Proposition:	7
Unbuyable Policy Justification Summary	8
Investing in proactive prevention and support:	9
The Fiscal Case.....	9
Budget Policy Ask	9
Evidence & Key Studies	10
Bill's Estimated Annual Cost (as Introduced)	11
The Case for Wider Investment - Prevention, Exit & Recovery.....	11
Proposals for Government through secondary legislation	12
Strategic Advantages.....	12
Risks of Under-Investment.....	12
Conclusion	13

The "Christie Commission" (Scotland)

The **Christie Commission on the Future Delivery of Public Services** was established by the Scottish Government in 2011 to review and recommend reforms for public services in Scotland. The report outlined four core principles for reform:

1. **Services built around people and communities**
2. **Working together to achieve outcomes**
3. **Prioritising prevention, reducing inequalities and promoting equality**
4. **Improving performance and reducing costs**

Source: [Christie Commission on the Future Delivery of Public Services - Scottish Government, 2011](#)

The proposed Prostitution (Offences and Support) (Scotland) Bill, introduced on the 20th May 2025 by Ash Regan MSP, would: criminalise the **purchase** of sexual acts; repeal the criminal offence for people selling sex; pardon and disregard historic solicitation convictions; and establish a statutory right to support for people in, exiting and recovering from prostitution.

The Bill is designed to form a legal foundation that shifts criminality onto those who buy sex (the demand side), while treating those selling sex as people exploited and eligible for support and exit pathways.

Commercial sexual exploitation (CSE) of prostitution starkly exposes the reactive, exponential cost of failing to deliver on all four Christie Commission principles in this area. It equally represents a transformative opportunity for cost-saving reforms, if addressed proactively, to achieve major benefits for both exploited individuals and for Scottish society, through the enactment and robust implementation of the **Proposed Prostitution (Offences and Support) (Scotland) Bill**, 'Unbuyable Bill'.

Applying Christie to Commercial Sexual Exploitation

Christie Principle: *Prioritise prevention, reduce inequalities, promote equality*

Prevention of prostitution - stop exploitation before it starts

Christie Principle: Prioritising preventative approaches to reduce demand on public services.

- Prostitution generates **hundreds of millions** in avoidable costs to Scotland each year, from violence, addiction, homelessness, health harm and justice-system involvement.
- **£382.6m annual cost** to Scotland from violence alone (2025) - excluding addiction, homelessness, healthcare, or trafficking costs [\[1\] Hard-knock-life](#)
- **£382.6m annual cost** to Scotland from violence equates to 0.6% of the Scottish budget, around **£69 per person in Scotland**.
- Preventing exploitation mitigates against the reactive cost of full-spectrum harm: “*hundreds of millions annually*” in escalating, recurring, reactive state expenditure (A&E, homelessness, Policing, addiction services) [\[2\] Social & Economic Cost of Prostitution in France](#)
- **£300k - £350k** in lifetime public-sector harm costs, per person exploited in prostitution [\[3\] Social and Economic Costs of Prostitution and Other Forms of Sexual Exploitation](#)
- Sexual crimes have increased both in annual crime figures and latest quarterly crime [figures](#)
- Prostitution is one of Scotland’s highest-cost forms of gender-based violence in terms of severity of harm to individuals and economic and social costs.
- **Preventing exploitation** from occurring, through deterrents to sex buyer demand and support of those exploited, through early intervention, reduces market demand. Coupled with advocacy pathways to access financial stability and housing protection, this model delivers the highest return on investment.

Justification:

Every woman and child prevented from entering exploitation represents a **long-term saving of hundreds of thousands of pounds** in avoided reactive costs from health and justice harms, alongside immeasurable human benefit.

Investment Proposition:

Early action to prevent women from entering prostitution, by reducing market demand, **generates the greatest public savings** and tackles the root cause of inequality that drives sexual exploitation.

Protection - support victims and those at risk

Christie Principle: Services must be built around people and communities, involving them as active partners.

- Coordinated multi-agency support (e.g. Ipswich Strategy) **cut criminal-justice costs by 55%** and reduced serious violence and emergency interventions. [\[4\] Ipswich Prostitution Strategy - UEA Evaluation](#)
- Evidence from **Glasgow** shows specialist services return **£5.99–£6.82 per £1 invested**. [\[5\] VAWG Services SROI](#)
- Housing stability, trauma-informed care and safe-exit pathways reduce repeat victimisation and crisis <-> cost cycles.

Justification:

Investing in holistic support for those exploited or at risk **reduces demand** on acute public services: NHS, policing and safeguarding, while empowering recovery and economic independence.

Investment Proposition:

Empowering survivors with holistic support **cuts crisis costs**, improves long-term wellbeing, and respects human rights.

Investment in sustainable, consistent high-quality support services and advocacy for women and children while in, to exit and recover from prostitution **generates the greatest return on investment of public funding**. In demonstrating Scotland's values, by properly supporting survivors of commercial sexual exploitation, society benefits, as survivor support to recovery and rebuild lives, allows them to contribute positively to society.

Like Rape Crisis Centres and Domestic Violence Refuges, many front-line support services in prostitution are survivor-led, helping others from their own experience in prevention services, support without judgement and exit and recovery services, when that support is requested.

Prosecution - pursuing exploiters and perpetrators

Christie Principle: Tackling root causes and shifting resources to where they have greatest impact.

- **The most expensive harms** come from male violence, organised crime and exploitation.
- Target those who profit from exploitation, to disrupt **organised crime, drug markets and trafficking**, which drive wide and deep societal harms.
- The **highest-cost harms**, in prostitution: murder investigations, serious violence and sexual assault are overwhelmingly perpetrated by sex buyers and third-party controllers.
- Directing justice resources toward perpetrators lowers the volume of victim trauma, costs of major investigation and reoffending over time. Enforcement focused on exploiters **reduces future public cost burdens** and strengthens community safety.
- Repealing the S46 solicitation offence is an acknowledgement from the state that those exploited in prostitution **are not criminals**, which helps to build trust relationships with support services alongside the Police and other justice bodies.

Justification:

Shifting criminal-justice focus from the exploited to those who exploit **reduces high-harm reoffending and future public expenditure** by deterring one of the most costly and damaging crime drivers targeting violence against women and girls in Scotland.

Investment Proposition:

Closing the current gap in the law on the purchase of sex provides Police Scotland and other justice bodies with the tools they need to apply the law on sex buying consistently across locations, not limited by current laws, which make the purchase of sex illegal from adults, **only in public places**. COPFS and Police Scotland acknowledge sex buying as an entry crime and this is backed by evidence from the [Police in Sweden](#) and the [Swedish Prosecution Authority](#), where all purchases of sex acts have been illegal since 1999. Evidence over twenty-six years demonstrates that, further, often more serious and organised crimes, such as drug supply, trafficking and rape grooming gangs, are uncovered from sex buying crimes.

COPFS acknowledge in evidence to the Criminal Justice committee that sex buyer profiles overlap with those of other sexual and violent offences, including rape, sexual assault and domestic abuse. Deterrents at the root cause, with clarity in law that sex buying is a crime, as it is exploitation of the vulnerable, sends a clear societal message. This helps to embed a societal acceptance effect to enforcement, as we have seen evidenced with drink driving law, smoking ban indoors and even seat belt wearing. Upfront investment in clear, consistent laws and strong public messaging, such as the proposed 'sex is not for sale' and 'consent cannot be bought', has been evidenced as highly effective from other accepted societal changes.

Partnerships - pursue whole-system collaboration

Christie Principle: Strengthening partnerships to deliver better outcomes and better value.

- Sex-based violence, health, homelessness, addiction and policing systems all absorb the cost of exploitation - **no single agency can address this alone** - a holistic approach is required.
- International evidence from Nordic Model countries shows **integrated exit models** produce lower repeat violence, also evidenced in the UK's Ipswich Strategy, which delivered a **55% reduction in criminal justice costs [4]**.
- Multi-agency models reduce duplication and crisis-driven spend, reduce emergency health use and sustain secure housing and employment.
- Major savings across systems are available through aligning VAWG strategies with homelessness, health, addiction, and policing strategies.

Justification:

Collaboration delivers **better outcomes at a lower cost** than a fragmented service response. Services working together with a single door entry for survivors help to build the security and trust that is critically needed to begin a recovery journey, particularly where complex PTSD is present. Advocacy from the single-entry point, into other services, when needed, secures **better outcomes at lower overall cost** than fragmented crisis-driven responses.

Investment Proposition:

Investment organisations with proven track records and a wealth of experience in providing joined-up support models with demonstrable success in supporting those in prostitution, and those who wish to exit and recover a strong footprint that can be replicated across Scotland. Creation of a National Pathway can capitalise on existing, evidence-based work, from services like [TARA](#) / [Routes Out](#), making for swifter, more immediately effective solutions by focusing funding at the frontline of support delivery where it is needed most urgently.

Unbuyable Policy Justification Summary

Prostitution is not cost-neutral, it is one of Scotland's most expensive and preventable harms.

The economic evidence is clear and consistent:

- Violence-only costs: £382.6m per year (2025) = 0.6% of Scottish Budget annually
- Full-spectrum costs: substantially higher, reactive and escalating as demand for prostitution increases
- Intervention and investment upfront, saves public money while reducing human harm

Investing in proactive prevention and support:

- reduces long-term reactive expenditure
- delivers measurable public-value returns
- protects those most at risk
- breaks the exploitation <--> emergency response crisis cycle

The Fiscal Case

Christie Commission Principle	What it means for CSE OF prostitution	Fiscal impact
Prevention	Reduce entry into prostitution and demand from buyers	Avoids £300k–£350k lifetime harm per woman
Protection	Maximise survivor recovery and stability	Saves > £6 for every £1 invested
Prosecution	Target exploiters and controllers consistently like in Sweden	Reduces highest-cost violent offending
Partnership	Integrated service pathways	Cuts homelessness, A&E use and crisis policing

Budget Policy Ask

Treat Commercial Sexual Exploitation of prostitution as a **Christie-aligned prevention priority**, meeting cost-saving reform, recognising that:

Proactive investment now reduces avoidable reactive expenditure for decades to come, while reducing violence, inequality and trauma harms.

Provide sustainable funding to embed high-quality, consistent, proactive prevention and specialist support in national and local delivery plans from over 30 years of experience and successful outcomes from the Roots Out Glasgow/TARA Model.

Across five independent evidence sources, below, the economic case is consistent:

Evidence & Key Studies

Study	Citation	Relevance
[1] Hard Knock Life: Violence Against Women in Prostitution	Kail, Jarvinen & Miller (NPC, 2008)	Scotland-adjusted violence cost: £382,627,339.54 (2025)
[2] Social & Economic Cost of Prostitution in France	Mouvement du Nid & Psytel (2015)	€1.6bn national cost; €40k (£34k) per woman per year
[3] Social and Economic Costs of Prostitution and Other Forms of Sexual Exploitation	Nordic Model Now (2025)	Lifetime harm: £300k–£350k per woman
[4] Ipswich Prostitution Strategy - UEA Evaluation	University of East Anglia (2013)	Criminal-justice costs: ↓55% (£154,731 → £72,324)
[5] VAWG Services SROI	Glasgow City Council (2022)	£5.99–£6.82 return per £1 invested

- Violence costs are currently unsustainable and escalating: **£382.6m annual Scottish cost** with the full costs of MVAW substantially higher
- **Support exits + prevent entry = major public savings**
- Christie-driven reform **reduces demand on every pressured service system**

Bill's Estimated Annual Cost (as Introduced)

From the Unbuyable Bill's [Financial Memorandum](#), projected recurring annual costs are:

Cost category	Estimated annual cost (low – high)
Additional policing (recorded crimes & cases)	£33,390 – £100,700
Additional prosecutions (COPFS / courts)	£84,785 – £218,073
Scottish Prison Service (custodial sentences)	£48,931
Community Payback Orders (local authorities)	£2,215 – £6,645
Sub-total criminal-justice & policing costs	approx. £169,321 – £374,349
Specialist support services (Scottish Administration)	£884,442 – £1,248,212
Additional support for trafficking victims	£311,000 – £622,000
Total estimated annually recurring cost (Bill)	£1,364,763 – £2,244,561

Interpretation: These represent the additional direct costs to public bodies of enforcing the new offence, providing support services and dealing with anticipated prosecutions and support demand if the Unbuyable Bill is implemented.

The Case for Wider Investment - Prevention, Exit & Recovery

The Bill's figures are **modest** compared to the broader potential costs associated with commercial sexual exploitation, which include:

- Long-term healthcare (physical, mental health, addiction)
- Homelessness and housing support services
- Emergency services usage (A&E, crisis care)
- Social work, safeguarding, child-protection (intergenerational impact)
- Criminal justice and policing associated with violence, trafficking, and repeat victimisation
- Lost economic productivity, welfare dependency, unemployment

While national-level data for all those harms, worryingly, do not exist, multiple studies and international modelling (e.g. based on “lifetime harm per person” estimates) suggest that the **lifetime public cost per individual exploited** can run into hundreds of thousands of pounds. This means that a modest but sustained investment now could **prevent or mitigate very large future costs**, while delivering social value, dignity and safety for survivors.

Proposals for Government through secondary legislation

1. **Work with existing expertise** on non-judgmental prevention, support and routes out services to build a strong, consistent support footprint all across Scotland.
2. **Allocate a multi-year, ring-fenced “Exit & Recovery Fund”** covering housing, mental health, addiction, legal support, social reintegration and specialist trauma-informed support.
3. **Commission trauma-informed, specialist support services** for outreach, case management, harm reduction, recovery pathways, with capacity scaled to estimated need, building on **cross-agency partnerships** across health, housing, social work, justice community NGOs to deliver integrated support.
4. **Implement monitoring & evaluation framework** track key outcomes (individual exit rates, service uptake, reductions in emergency services, housing stability, re-victimisation) measure long-term savings vs. initial investment.
5. **Ensure nationwide coverage** to prevent a postcode-based patchwork; deliver equality of access across Scotland.
6. **Plan for flexibility and scaling** to build capacity for increased demand; tailor services to local needs; allow for scaling up or adaptation.
7. **Ensure the right data is captured** in all systems to help identify clear patterns of exploitation and address any improvements needed in implementation approaches to iteratively improve outcomes.

Strategic Advantages

- **Prevention over crisis:** Up-front investment reduces long-term emergency demand (health, housing, policing).
- **Cross-system savings:** By stabilising individuals (health, housing, social integration), there will be fewer repeat crisis calls, fewer emergency responses, less recidivism / re-victimisation.
- **Human rights & equality:** Investment supports survivors’ human dignity, reduces inequalities, advances social justice.
- **Policy alignment:** the Scottish Government supports the principles of the Unbuyable Bill, which aligns with the Scottish Government and COSLA Equally Safe Strategy and commitments to end MVAW and to end sex-based exploitation.

Risks of Under-Investment

- Without stable exit and support pathways, many people leaving exploitation may relapse or suffer ongoing harm - undermining the Bill’s full intent.
- Public services remain burdened - frequent crisis interventions, repeat homelessness, repeated emergency healthcare and policing.
- Geographic and socio-economic inequalities persist only some areas may provide support (postcode lottery), leading to inconsistent outcomes across Scotland.

Conclusion

Commercial sexual exploitation is one of Scotland's most expensive and preventable harms to women and girls.

Applying the Christie Principles to CSE demonstrates that:

- **Preventing exploitation saves public money and lives**
- **Protection services reduce costs and inequalities**
- **Targeting exploiters improves justice outcomes**
- **Partnerships deliver better value for every pound spent**

The Bill's projected direct costs to public services (\approx £1.36m–£2.24m annually) are modest compared to the **long-term, unallocated costs of unmanaged exploitation**. The Finance and Public Audit Committee are content with the [Financial Memorandum of Unbuyable Bill](#).

Much common ground has been presented from evidence taken by the Criminal Justice Committee and constructive engagement with stakeholders, including justice bodies, has resulted in agreement on a set of amendments I am progressing to remove barriers for support to a simple, 4.5 page, 11 schedule bill that can deliver a hugely positive impact. My Unbuyable Bill meets the government and COSLA's Equally Safe Strategy and commitments by parties and independent members of parliament on tackling the crisis of male violence against women and girls. It is a demonstrable investment for both Scotland's society, public services and economy.

Investing now in prevention, exit and recovery services is **not only socially responsible - it is also fiscally responsible and consistent with the Christie Commission's public-service reform principles.**