




Ending all forms of violence against sex workers


Principles:

- ◆ Sex Workers First
- ◆ Quality Support
- ◆ Learning and Innovation

"Thank you so much for being the organisation you are. To know we are not alone and supported means everything. I remember, back in the day, NUM's alerts were photocopies delivered to the walk up flats in London, that was 30+ years ago and you are still going and getting stronger. I feel so much safer knowing NUM exists and is so accessible. Thank you for all you do."

- NUM Member

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www.nationaluglymugs.org

Charity no. 112246

Audrey Nicoll
Chair, Criminal Justice Committee
The Scottish Parliament
Edinburgh
EH99 1SP

December 8, 2025

By email: justice.committee@parliament.scot

Re: Prostitution (Offences and Support) (Scotland) Bill

Dear Chair,

I am writing to follow up on two areas of evidence provided by Ash Regan MSP during her recent appearance in front of the committee, to ensure that members are aware of the true factual position.

Screening is not "a myth"

In response to a question from Katy Clark MSP about sex workers raising concerns that criminalising the purchase of sex would damage their ability to screen clients, Ms Regan replied: "Screening is a myth."

I cannot emphasise strongly enough that this point is completely and utterly false. As the UK's national sex worker safety charity, supporting more than 9,000 active sex workers, we know that they take a range of steps to screen clients ahead of meeting them. This can include requesting proof of ID, and/or pre-payments (to confirm identity via banking information), as well as using a range of screening tools, such as our own NUM Checker.

NUM Checker allow sex workers to screen details such as phone numbers, addresses and car registrations for prior warnings about safety or timewasting, as well as to submit safety alerts of their own.

The most recent full-year figures for our own NUM Checker tool show that it was used to make 585 reports of violence against sex workers across the year, while the tool sent out just under 850,000 alerts to our members. Sex workers used the tool to proactively screen clients on more than 18,000 occasions.

Other tools also exist – such as the sex worker-designed and operated app ClientEye – which we know are widely used by sex workers, including those who are not members of NUM.

The fact that Ms Regan is unaware of the custom and practices of sex workers, and the services they use to keep themselves safe, is further evidence of the lack of consultation she has undertaken in drawing up her Bill.

Evidence of harms caused by criminalising the purchase of sex

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Jamie Hepburn MSP asked Ms Regan: "When you have engaged with those who are opposed to your bill, and in whose perspective it would increase the likelihood of selling sex being less safe, what have they said?"

She replied: "I had a meeting with representatives of National Ugly Mugs. They put that perspective to me, and I asked them to show me the evidence for it, but there is none."

This is again a highly misleading characterisation. In the course of Ms Regan's consultation while drafting the Bill, which we would best describe as "cursory", NUM met with Ms Regan and subsequently submitted a 7000-word, 14-page document to her, setting out the evidential basis as to why sex workers oppose her proposals (including on safety grounds). Our evidence was not adequately reflected in the summary of consultation responses subsequently published by Ms Regan.

We know that the committee has been supplied with a vast array of evidence, both from a lived experience and academic perspective, as to how and why criminalising the purchase of sex makes life less safe for sex workers, and we see no point in rehearsing those arguments here.

However, we would invite the committee to consider whether Ms Regan's comments suggest that she has carried out adequate consultation in the course of drafting her Bill, and whether the evidence the committee has received backs up the above claims that she made during her appearance.

We would echo the comments of the Cabinet Secretary in her evidence to the committee, that "if it was a Government bill, in order to address the clear issues that we have identified with it, we would require, at the very minimum, significant consultation and engagement with the women who would be impacted by it". It is highly regrettable that such consultation has not been undertaken.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lynsey Walton'.

Lynsey Walton

Chief Executive, National Ugly Mugs