



**WOMEN'S  
SUPPORT  
PROJECT**

**WORKING TO END VIOLENCE AGAINST WOMEN**

## **Response to the Scottish Government's consultation 'A New Deal for Tenants'**

**April 2022**

*"I want my own house, to have my daughter  
back and really just to know myself and to be  
settled in my life."*

— Joanne, Inside Outside<sup>1</sup>

The Women's Support Project (WSP) is a feminist charity working to raise awareness around violence against women and girls (VAWG) and to improve services for those affected, including people affected by commercial sexual exploitation (CSE). There are clear links between child abuse, childhood neglect and domestic abuse and women's involvement in prostitution. These factors, along with poverty, problematic substance use, homelessness, trauma and mental health issues create vulnerability and inequality, which is exploited through men's payment for sexual activity.

This response focuses specifically on question number 10, which asks '**What measures could be implemented to support people involved in sex work, including women subject to commercial sexual exploitation in the rented sector?**'. We would like to start by expressing that our response to this question could not be contained within only a couple of pages. Women's housing context in Scotland is complex and their needs cannot be captured in a single question. Indeed, their needs in the rented sector cannot be separated from their housing needs in general, and the themes addressed in this response account for that. Moreover, this is the first time that a consultation has specifically included a question about the housing needs of women who sell or exchange sex, which is encouraging but problematic, as it clearly points to the lack of a gendered lens when designing a housing strategy for Scotland. As other Scottish organisations have pointed out already, the links between housing and gender-based violence, including CSE, are closely interrelated and cannot be side-lined if this strategy for the rented sector is to work for everyone in Scotland.

Tackling GBV has been highlighted as a priority area of work for governments in Scotland. In 2020, COSLA and the Improvement Service hosted an event exploring the collective leadership that is needed at a local and national level to tackle GBV and gender inequality. Recommendations included the urgent need to prioritise the safety and wellbeing needs of people experiencing GBV in both local and national decision-making, and an expectation that

---

<sup>1</sup> Inside Outside is a project coordinated by the Encompass Network which amplifies the voices and stories of women who are, or have been involved, in the 'sex industry' in Scotland. The full project can be found here: [www.insideoutside.info](http://www.insideoutside.info).

tackling GBV is everyone's business across all policy agendas. In fact, we believe that this consultation is an opportunity for the Scottish Government to design a housing strategy with a GBV lens, which aligns with the Equally Safe strategy, and which explores and addresses the specific situation for women who sell or exchange sex. In our view, only by addressing the links between housing and the range of ways in which GBV may be experienced can the government truly respond to the housing needs of all women.

Much can be said about housing and its links to CSE; however, we have included key themes which relate to the most immediate needs. It is our hope that going forward the government will consider further scoping and research into the breath of housing needs and experiences of women in CSE. The recommendations we put forth here are informed by the experiences of women we have worked with, and their voices are included throughout. It is also based on needs assessments conducted, the recent Encompass Snapshot<sup>2</sup> of specialist services for women affected by CSE, and our work with agencies and services. We are equally looking forward to reading the collective responses to this question from across the sectors and the suggestions made based on their own experiences and contexts. We see this consultation as an opportunity to open up the conversations around women in CSE and their needs with clear actions to follow.

We have divided this document into the key areas of need which we identified based on the above and the changes we want to see so that women involved in CSE can access adequate housing in the rented sector and beyond. However, firstly, we give an overview of the links between housing, gender and commercial sexual exploitation.

## Women, housing and commercial sexual exploitation

Housing and homelessness are a gendered issue and there is a complex, gender-specific dimension to women's experiences. As a result, any strategies or policies related to these issues must be developed using a gendered lens which recognises the specific challenges that women face. Some common themes for women experiencing homelessness include:<sup>3</sup>

- Single parenthood as risk of homelessness
- Poverty
- Heightened stigma and shame
- Adverse childhood experiences including abuse and time being looked after or in the care systems
- Domestic abuse as a pathway into homelessness
- Experiences of gender-based violence on the street or in unsuitable accommodation
- Compound trauma
- Poor physical and mental health issues often co-occurring with substance use and often rooted in trauma
- Lack of appropriate and safe specialised women-specific health services including access to sexual and reproductive health rights
- Fear of losing children and trauma of separation from children

---

<sup>2</sup> [https://www.encompassnetwork.info/uploads/3/4/0/5/3405303/encompass\\_snapshot\\_2021.pdf](https://www.encompassnetwork.info/uploads/3/4/0/5/3405303/encompass_snapshot_2021.pdf)

<sup>3</sup>

[www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf](http://www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf)

- Lack of safety in mixed gender services and avoidance of services where men are present.

In addition to these issues, women will experience multiple intersecting barriers which might increase their risk of becoming homeless. As FEATSA, the European Federation of National Organisations Working with the Homeless, has written: “certain groups of women such as women with children, young women, older women, women engaging in survival sex, women who identify as LGBTIQ, women with a migrant background, minority and Roma women and women living with disability are more likely to experience housing instability and homelessness.”<sup>4</sup>

Gender inequality also means that women’s housing options are impacted the disadvantages they experience in the labour market –such as part-time or precarious and/or low-paid employment<sup>5</sup>– or their overreliance on benefits due to having caring responsibilities. According to Engender, **women often pay a higher proportion of their income on housing**, and are

- less able to access adequate standards of housing
- more likely to live in overcrowded housing or poor conditions
- more vulnerable to housing insecurity.

The above inequalities can push women towards the sex industry or commercial sexual exploitation, they remain a huge issue whilst they are involved and can prevent them from leaving. The links between housing and CSE can be observed in a number of ways:

- high levels of women in street prostitution experiencing housing problems and homelessness during their involvement in prostitution.
- women forced to seek accommodation with pimps or abusive partners in order to prevent homelessness
- problems with location resulting in feeling isolated and living away from support networks<sup>6</sup>
- a lack of access to affordable and safe housing means women sell sex to afford high private rental costs.

In November 2021, the frontline services involved in the Encompass Network carried out a snapshot survey of the women they supported over one week. The Encompass Network is made up of organisations that provide specialist support to women at risk of becoming involved in, are currently involved in, or have exited selling or exchanging sexual activity / commercial sexual exploitation (CSE). Over the week, the 7 organisations which make up the Encompass Network supported 150 women. Of these 150 women over 50% women needed support in relation to housing and 22% in relation to homelessness. Almost a quarter of the women disclosed experiences of childhood sexual abuse and over half disclosed domestic abuse. 80% disclosed mental health issues and 16% had a physical disability.<sup>7</sup> The snapshot captured the complexity of womens lives and experiences and the range of services that should be connected to best meet their needs.

---

<sup>4</sup> FEANTSA, Guide for developing effective gender-responsive support and solutions for women experiencing homelessness.

<sup>5</sup> <https://www.engender.org.uk/content/publications/GENDER-HOUSING-AND-HOMELESSNESS---A-LITERATURE-REVIEW.pdf>

<sup>6</sup> Breaking down the barriers: A study of how women exit prostitution, Julie Bindel, Laura Brown, Helen Easton, Roger Matthews and Lisa Reynolds Eaves and London South Bank University (LSBU).

<sup>7</sup> Encompass Snapshot, <https://www.encompassnetwork.info/resources.html>

Therefore, it is vital to understand that women in CSE are not a homogenous group and so their housing needs will differ from one person to the other. A woman may be involved in exchanging sex for a place to stay, whilst another may be struggling to find affordable accommodation or pay a mortgage. As a result, their housing needs in the rented sector cannot be seen in isolation from other housing issues.

Below we outline the key housing needs we have identified with recommended measures to support women in CSE within and beyond the rented sector:

## 1. Homeless emergency accommodation

*“I met a very influential man. Big dangers came with being associated with him. I was his plaything, I was his entertainment. I was in a homeless hostel, getting phone calls at three o'clock in the morning. He said there was money to be made off of me ... He wanted to put me in a flat to do whatever he wanted me to. I was like, 'No' but he kept on and on at me. I was worried, not only what he would do but what his associates might do to me. I ran away to Olivia's, one of my friends who was also a drug user.”*

— Wendy, Inside Outside

Considering the needs in the rented sector of women who are involved in commercial sexual exploitation firstly requires recognising that women who are being exploited might struggle to secure rented housing in the first place due to being homeless, and women who are already homeless are more vulnerable to being exploited. As organisations like Engender and Scottish Women's Aid have repeatedly pointed out, ensuring access to safe, secure, stable and affordable housing must be a key consideration in the government's strategy to improve the housing needs of women in general and this requires understanding that men and women experience homelessness differently.

Amongst women involved in selling sex on the streets, there are high levels of 'hidden homelessness' whereby they have informal, unstable housing arrangements with associates, friends and family –such as using a friend's temporary hostel accommodation, derelict buildings/squats or staying with punters/clients. Sarah Jane, a participant from our Inside Outside project explained:

*“I moved in with a couple I knew. I ended up staying with them a lot because it was fine and handy for work. I was bringing money back from prostitution and it was keeping them in drugs as well. Their habits were getting kept along with mine so they were more than happy for me to stay. It suited them to have me involved [in prostitution]. Yep very much so!”*

Repeat homelessness is also very common. A study by Sheffield Hallam University<sup>8</sup> on street prostitution found that half the women experienced homelessness five times or more, and almost a third had experienced ten or more episodes of homelessness. Once women become homeless, it can be difficult for them to move out of that situation, and they may end up going through the experience repeatedly.

Women's difficulties in accessing adequate and stable housing can increase their vulnerability and risk of being sexually exploited. Some women experience coercion from their

---

<sup>8</sup> The Housing Needs and Experiences of Homeless Women Involved in Street Sex Work in Stoke-on-Trent (2009).

partners/pimps to sell sex and can become trapped in that situation due to the abuse. Women may have to sell sex to obtain money to pay for rent or mortgage to avoid becoming homeless.

In this landscape, emergency accommodation exists as an immediate safe alternative to homelessness. However, without consideration of the ways in which women experience homelessness, the experiences of gender-based violence they might be in or have gone through, and the particular dynamics of CSE, emergency housing services might prove unsuitable to women, pushing them back into unsafe situations and thus increasing their risk of being exploited.

Women involved in CSE have a range of needs due to their backgrounds and experiences of trauma, which current emergency accommodation may not always be able to accommodate, such as:

- Long-term emotional support focusing on their experiences of gender-based violence
- Post-traumatic stress disorder and complex mental health needs
- Advocacy to report instances of abuse and to engage with the justice system
- Problematic substance use
- Access to social benefits
- Support to exit the “sex industry” if they choose to do so.

Studies have shown the relationship between problematic substance use and involvement in street prostitution. Women sell sex to gain money to fund purchasing drugs for others and themselves.<sup>9</sup> This is often described as ‘survival sex’, where women sell sex as a last resort, to provide shelter, food, or fund severe addictions in a ‘work-score-use’ cycle.<sup>10</sup> Consequently, women in homeless accommodation can be targeted by men who will exploit their involvement in prostitution for things like money and drugs, which in turn makes it harder for women to engage with the support they need. In a joint study by the University of Dundee and Dundee Women’s Aid looking at gendered service provision for homelessness and substance misuse, a frontline worker explained: “when [women] went into the hostel and we knew they were involved in prostitution they were almost targeted by men, because they were seen as earners. They would be a guaranteed source of income, so people would buy their drugs to begin with and then quickly turn in to them going out and having to pay their debt. That kind of process was involved and their ability to get away for an appointment was really difficult.”<sup>11</sup>

Moreover, barriers to accessing emergency housing support can remove women’s opportunities to leave the “sex industry.” Some of these barriers include:

- Unwillingness to approach a service due to past negative experiences of stigma
- Being housed in mix-sex accommodation where they might be vulnerable to new, ongoing or further exploitation, such as exchanging sex for drugs or money
- Rules, such as night curfews, which can make women reluctant to access the accommodation due to selling sex at night
- Being excluded from accessing homeless accommodation due to having the No Recourse to Public Funds (NRPF) immigration condition or being undocumented.

Thus, emergency accommodation services play a key role not only in breaking the cycle of homelessness for women, but crucially in reducing their risk of being further sexually exploited

---

<sup>9</sup> Jeal, Nikki & Salisbury, Chris. (2004). A health needs assessment of street-based prostitutes: Cross-sectional survey. *Journal of public health*, 26: 147-51.

<sup>10</sup> McNaughton, C. and Sanders, T. (2007) Housing and Transitional Phases Out of ‘Disordered’ Lives: The Case of Leaving Homelessness and Street Sex Work. *Housing Studies*, 22(6): 885-900.

<sup>11</sup> UCL Institute of Health Equity. (2014). A Review of the Literature on Sex Workers and Social Exclusion.

in several ways. They can be a point of contact through which women can be risk assessed to be linked with a multi-agency approach of wrap around care and so provide some stability and connection. For some women with chaotic and complex lives, it could be the starting point to be informed of her rights and consider options. There is a wealth of international and national evidence that has shown how crucial a gendered lens is essential to successfully address the homelessness experienced by women. We will not delve into such evidence here, as we believe organisations like Scottish Women's Aid, Engender and others have already produced excellent reports on this. However, we want to highlight here that a gendered lens in homelessness would ensure that the emergency accommodation recognises the needs of diverse women, including those of women affected by CSE. Therefore, we recommend a review of the appropriateness and suitability of the types of emergency accommodation currently offered to women in Scotland, with the goal of understanding whether it is adequate and meets the needs of women experiencing GBV and CSE in particular.

Women will struggle to leave the cycle of homelessness unless the root causes of their homelessness are well understood, and support is provided so they can move into a more stable housing situation. For this reason, we believe it is crucial for homeless emergency services to develop and introduce robust risk assessments that consider the links between homelessness (particularly 'hidden homelessness') and gender-based violence, including CSE. Such assessment should include a routine enquiry question about experiences of gender-based violence and any involvement in CSE. This way, women can be linked in with relevant supports and the homeless service offered can consider safety in the context of CSE; for example, ensuring exploiters cannot access the accommodation where a woman might be temporarily housed. We have previously heard of women who were being exploited by multiple perpetrators whilst being homeless and upon engaging with a homeless service, they were placed temporarily in commercial holiday lets alone and without support. As a result, perpetrators continued exploiting the woman in her emergency housing and the cycle of abuse continued. These situations can only be avoided when proper assessments are in place with good understanding of the dynamics of exploitation, support is offered to women and staff are trained to identify CSE and perpetrator behaviours. A good practice response would involve induction and regular training on GBV including recognition of CSE as a form of abuse, in line with the Equally Safe strategy.

It is essential that staff have a trauma-informed approach when engaging with service users and particularly with women who have been subjected to CSE. The impacts of trauma when it comes to GBV are far reaching and it is important for workers to know the trauma responses of women and how this might impact their engagement with services (see Section 9 below for specific recommendations on this). As a worker from one of the Encompass Services explained: "women who are vulnerable, women who have faced gender-based violence do not always present as vulnerable. Sometimes they come in with an attitude. They're not this wee, shy, timid wee woman...crying. The reason they're like that is that they had to be like that to survive ... and the way that they present, and anything negative in their history of housing like noise complaints or fighting or arguing with their neighbours, doesn't negate how vulnerable they are."

The Women's Support Project is developing a network for service and agency workers called CSE Aware<sup>12</sup>, which aims to improve understanding of and practice responses to the needs of women who sell or exchange sex through resources and capacity building. We have already seen huge interest from workers across a range of services and sectors ask for further training and learning opportunities about CSE and responding to women. This includes a large number

---

<sup>12</sup> [www.cseaware.org](http://www.cseaware.org)

from the Housing sector. This demand for training along with discussions and work with colleagues in housing shows that workers in this sector are encountering women who sell or exchange sex and want the support to properly respond to them. Although CSE Aware aims to cover some of this gap, we strongly believe that agencies need to introduce their own induction and regular training which is informed by the experiences of women and the expertise of organisations that have been working in this area.

Moreover, as explained above, the needs of women in CSE are wide-ranging, from issues with problematic substance use, being separated from children, mental health issues due to trauma, continued abuse and harassment from perpetrators, among others. Given the complexities and how interconnected they are, the housing needs of women cannot be met by one single agency and a multi-agency response and partnership work is the only effective option.

While this section has addressed the needs of homeless women, emergency accommodation should not be considered a solution to homelessness or replacement for longer term solutions. Although emergency accommodation should support the immediate needs of women in CSE who are homeless, we favour the introduction of the Housing First model along with supported accommodation for women in CSE who need it (see Section 3, 'Supported accommodation designed for women in CSE' below). Protocols must be created for consistent approaches with women to transition from hostels/refuges into supported accommodation with a longer-term plan for moving into stable housing more easily. Following the Key Principles of a Gender-Informed Homelessness Service Response by FEANTSA, these protocols must be flexible, non-judgemental, and combat stigma and stereotyping.

#### Recommendations:

- Evaluate the appropriateness and suitability of the types of emergency accommodation currently offered to women and whether they meet the needs of victim/survivors of GBV, including CSE.
- Introduce robust risk assessments which consider the links between homelessness – particularly 'hidden homelessness' – and CSE.
- Include a routine enquiry question about GBV (which includes CSE) when assessing homeless women.
- Provide staff with regular training on the needs of women in CSE and trauma-informed responses. Training should be informed by women's experiences and the expertise of specialist organisations.
- Recognise the need for a multi-agency response to women in CSE and develop strong links between agencies.
- Build protocols for women to transition from emergency accommodation into supported accommodation.

## 2. 'Sex for rent'

*"It's sickening there are landlords who think they get away with sexually exploiting female tenants in need of a home. Keeping a safe roof over their head is only getting harder for women on the lowest incomes. We're worried even more tenants will be left vulnerable to this vile abuse of power."*

— Polly Neate, Chief Executive of Shelter

Women in unstable housing situations are often asked for sex in exchange of housing. Commonly called "sex for rent," this is an arrangement where someone offers housing in

exchange for sexual activity. This can range from individuals with a spare room to opportunistic landlords, past or present clients, pimps and people in their lives that may want to exploit their situation and their risk of becoming homeless. Situations of 'sex for rent' can also happen when a spare room is advertised with reduced rent for sex, when a landlord suggests exchanging sex in lieu of money or when a person on low income never enters into a tenancy agreement and instead is asked for payment in sexual favours. As well as being clearly exploitative, these arrangements mean a tenant does not have housing rights or security, making it an abusive and unstable housing situation for women which can lead to further trauma and possibly homelessness.

In 2017, a survey conducted by Shelter UK found that 6% of respondents had been asked for sexual favours in exchange for free accommodation, discounts on rent or paying off rent arrears. More recently, a Shelter and ComRes survey published in January 2021 found that 30,000 women in the UK were propositioned with 'sex for rent' offers between March 2020 and December 2020 on mainstream selling platforms. During the early stages of the pandemic, The Encompass Network<sup>13</sup> carried out a scoping of advertisements asking to buy sex placed by men on commercial advertising platforms. We found the ads to be particularly prevalent in high-rent areas such as Edinburgh and Aberdeen. Over 1,600 ads were placed with requests showing men were clearly aware of women's vulnerabilities:

- "Any single mums struggling with this lockdown and coronavirus"
- "Any desperate and cheap women"
- "Condom-free is preferred, students and single mums welcome. If you fancy getting pregnant that's an added bonus. If you are already pregnant that's cool too."

Women's heightened risk was noted as follows: "the national scoping exercise of online adverts provided that online sites were flooded with new images and there was a higher level of competition for income. In some cases this was resulting in men pushing boundaries and women engaging in riskier practices, often within their own home. A number of online advertisements made reference to Coronavirus. Services observed women advertising that they are new to the sector, and many justified their involvement due to unemployment/financial difficulties related to lockdown."

The pandemic context and subsequent increases in living costs are having a greater impact on women. This added vulnerability can be exploited through 'sex for rent' arrangements, which ultimately do not solve women's lack of housing, but increase their risk of further traumatising, abuse and homelessness. And whilst we recognise that 'sex for rent' is fuelled by women's financial situations and the lack of affordable housing, it is important to note that this issue is gendered with women being asked more frequently than men and their vulnerabilities exploited in this way. This reflects broader inequalities that reduce women's options and opportunities. Like all the issues we have included in this response, 'sex for rent' must be addressed using a GBV lens. Thus, affordable housing must be available specifically for women in CSE with recognition that they face specific barriers to access this. Additionally, women in CSE should have access to financial support to afford their basic needs. We believe that meeting these two conditions should reduce situations where women are asked for sexual favours in exchange for housing.

**Women with NRPF and 'sex for rent'** – we would also like to note the particular vulnerability faced by migrant women who have the No Recourse to Public Funds (NRPF) condition

---

<sup>13</sup> "Overview of domestic abuse/VAWG trends and experiences during COVID-19 lockdown, for the period 30/3/20 – 18/05/20." Scottish Government, May 2020.



attached to their immigration status. Because women with NRPF cannot access publicly funded support, which includes financial benefits, refuges and other government funded housing. This means that, when they become at risk of homelessness or they are in abusive or exploitative situations, their options become extremely limited. This can result in being propositioned for sex in exchange for a room to sleep or it can push women into exchanging sex for rent. And because their options are so limited, it can be incredibly difficult for women with NRPF to find safer and more stable housing situations.

On a justice level, women should have access to support and justice when individuals or landlords request sex in exchange of housing. Whilst it is illegal for a property owner to demand sexual favours in return for rent or accommodation, until now only one man has been arrested or convicted for it in the UK by March 2022. This is a discouraging result given the high numbers of individuals making such requests since the pandemic started, as shown above. Therefore, additional recourses are needed in order to eradicate instances of 'sex for rent' and to send a message that sexual exploitation is not tolerated in Scotland. Similarly, we recommend implementing mechanisms that allow reporting any private landlord who offers accommodation in exchange for sexual activity to the relevant local authority, which should then consider whether said landlords are "a fit and proper person" under the law relating to landlord registration and licensing of Houses in Multiple Occupation. Anyone who proposes 'sex for rent' should not be allowed to hold a landlord license. Finally, there is urgent need to review current legislation in order to assess whether it provides justice routes for women who have been victims of 'sex for rent.' Currently, forcing someone to participate in sexual activity is considered a crime in Scotland. Yet, there is no guidance or protocols which cover 'sex of rent,' meaning that instances of this form of exploitation might go unaddressed. A review should also consider introducing a specific law criminalising asking for sexual services in exchange for housing or rent reductions. Such law would be wide in its understanding of who may make such propositions. After all, it is not only landlords who might ask sex in exchange for housing, but also individuals with spare rooms or additional space to house a person within their existing homes.

#### Recommendations:

- Ensure sufficient affordable housing for all, and adequate access to housing for women in CSE who face additional stigma and barriers. Along this, it is essential that women receive financial support to afford their basic needs.
- Implement mechanisms so private landlords offering accommodation in exchange for sexual activity can be reported to the relevant local authority which should then consider if they are "a fit and proper person" under the law relating to landlord registration and licensing of Houses in Multiple Occupation.
- Review current legislation, its implementation and effectiveness in ensuring justice for victims of this type of exploitation. Forcing someone to participate in sexual activity is already a crime in Scotland and specific guidance and operational protocols should be issued covering how 'sex for rent' is included in this understanding.
- A legislative review should additionally consider introducing a law which makes asking for sexual services in exchange for housing or rent reductions a criminal offense. Any such legislation should cover registered landlords and individuals offering spare rooms in exchange for sex.

### **3. Supported accommodation designed for women in CSE**

*"This is the first time in a couple of years that I have felt secure and happy with my housing situation, and it can only get better."*

- Woman who participated in Basis' Housing First pilot<sup>14</sup>

Supported accommodation should be available for all women who have experienced any form of abuse or violence, including commercial sexual exploitation. However, Scotland currently offers services such as refuges/crisis accommodation for women experiencing domestic abuse, trafficking and some limited housing for young women who have experienced sexual violence through SAY Women. There is no provision of supported accommodation specifically for women at risk of or in CSE. Housing for victims/survivors of domestic abuse is provided by women's aid groups in local areas. Meanwhile TARA currently offers supported crisis accommodation for survivors of trafficking for sexual exploitation for up to 45 days and advocates on behalf of women with other agencies and services.

There is recognition of the vital nature of immediate and safe housing for women fleeing violent situations, particularly as there are recorded instances of women being murdered by abusive partners or ex-partners in shared accommodation. There is also a recognition that women can remain at risk of abuse for a long time after their immediate housing needs have been met through emergency accommodation. Additionally, women who are being sexually exploited face the added risk of violence from exploiters, pimps, past and current clients as well as organised crime. Although refuges exist for women and children fleeing domestic abuse, the pressure on these services and the specific focus on domestic abuse might mean that they cannot meet the range of needs and complex circumstances that women in CSE often present with. Indeed, there is a gap for women to access some of this supported accommodation and to remain in it. As a worker from Encompass Network services pointed out, being housed in unsuitable accommodation or housing that cannot meet her needs can result in women being removed from the service and back into homelessness: "a woman who actually ended up in a women's refuge situation, she struggled to engage with [the service] because she has complex needs and she's not the easiest person to engage with because of everything that's been going on. And because of that, they had to tell her to leave the accommodation because they couldn't justify her staying there if she wasn't going to engage in support. That was part of the tenancy agreement. Now she's back living in a hostel situation, and I'm concerned that this cycle will just continue ... and she's obviously back to being really, really concerned about her substance use. Will that then impact on her involvement in prostitution? Her mental health? All those sorts of things. It's hard for her. I understand the other services point of view. You need to have engagement from women, but I suppose it's about how do you get good engagement and balance [women's] housing needs at the same time."

Beyond women's refuges, there is a need for specialist supported accommodation which allows women to sustain stable housing and reduce the risk of entering or re-entering the cycle of homelessness as well as reducing their vulnerability to exploitation. Given the range of social, financial and health needs that woman in CSE can present, there is a need for non-judgemental accommodation designed specifically for them which enables them to maintain stable housing, recover from trauma, recover from substance misuse, find safety from abusive relationships, and exit prostitution if they wish to do so.

Basis in Leeds piloted a Housing First<sup>15</sup> model designed specifically for women in street prostitution. Women required support on homelessness, substance misuse, domestic abuse, mental and physical health issues, self-harm or suicide attempts, and having had children

---

<sup>14</sup> <https://hfe.homeless.org.uk/sites/default/files/attachments/Basis%20Evaluation%202017.pdf>

<sup>15</sup> Housing first is a model designed for homeless people with complex needs. The model moves homeless people into independent housing, giving them access to services so they can adjust to life in their community. Housing First emphasises people's choice and control using a harm-reduction approach. Basis, a service for women in Yorkshire, successfully piloted a Housing First service for women involved in street prostitution.

removed from their care, among others. These issues meant that existing models of supported housing had not been able to meet their needs. In addition to the Basis Housing First pilot, there are other excellent examples of practice in existence, which can be taken as a model. For instance, Commonweal Housing partnered with St Mungo's to develop the Chrysalis Project<sup>16</sup> piloting a model with a three-stage process built around Judith Herman<sup>17</sup>'s three stages of recovery from trauma: safety, remembering and mourning, and reconnection. Women progress through these stages in relation to the type of accommodation and level of support required. Stage one provides specialist hostel accommodation with 24-hour support available. Stage two means moving into a less intensively supported housing project, before moving into Stage three, when rent their own flat, where they live independently still with access to specialist support to maintain tenancies. Another Housing First project created by Threshold<sup>18</sup> in York highlighted that the settled, secure and adequate housing provided meant women felt safer and better able to plan their lives due to the stability and predictability of their lives.

Participative approaches to the design and delivery of housing support services must be used and include women with 'lived experience,' to ensure that these reflect the realities, challenges, and experiences of women. Among the services offered by supported accommodation, there should be transitional housing that allows for a 'breathing space' for women to decide their next steps and whether they need to exit the 'sex industry.' Without a space where women can exit repeated trauma, it can become very difficult for them to move on from their experiences and find other opportunities, even if they wish to exit CSE. In *The Life Story*<sup>19</sup>, a US project for women survivors of the 'sex trade', an advocacy worker explains: "it is absolutely critical for a woman who's been trafficked to access some place where she can exit the trauma. When she is always looking behind her, when she is always worried about further trauma, she can never come back to zero. She can never feel that moment of safety that allows her to recalibrate, that allows her to say 'OK, this is peace, this is safety. I can think about finding an exit'."

There is currently a gap in supported housing specifically for women in CSE in Scotland, which affords the opportunity for pilots to be co-developed with women with lived experience to ensure these are based on women's needs and evaluated thoroughly. The learning can be shared and used to inform the practice of wider services to support a group of women who, as evidenced throughout this response, are often excluded from accommodation currently provided. Moreover, staff working in such services would be trained to understand the dynamics and impact of CSE. Support would cover a range of areas, including exiting and it should be built on the basis that a woman should have control over what she wishes to do.

Alongside specific supported accommodation, it is essential that current refuge provision is flexible and can cater to women with complex needs. In their guide for gender-responsive support for women in homelessness, FEANTSA highlights the need to place flexibility at the core of these services: "a variety of options need to be given for women to choose from and while the ultimate goal is permanent housing, some women might need a high level of support in a residential setting for some time in their lives ... Women need to be given the choice and there needs to be flexibility in the degree of support provided depending on the situation women are facing at a particular point in their lives."

---

<sup>16</sup> University of Kent (2012), Evaluation of the Chrysalis Project: Providing accommodation and support for women exiting prostitution.

<sup>17</sup> J. Herman (1997), *Trauma and Recovery: the aftermath of violence – from domestic abuse to political terror*.

<sup>18</sup> [hfe.homeless.org.uk/sites/default/files/attachments/Threshold%20Interim%20Evaluation%202016.pdf](https://hfe.homeless.org.uk/sites/default/files/attachments/Threshold%20Interim%20Evaluation%202016.pdf)

<sup>19</sup> [www.thelifestory.org/housing](http://www.thelifestory.org/housing)

### Recommendations:

- Use previous learning and good practice from VAWG and Housing sectors along with Housing First pilots to develop a model of supported accommodation in Scotland designed specifically for women who sell or exchange sex with complex needs.
- Staff in such services should understand the dynamics and impact of CSE and support should cover a range of areas, including exiting and giving women control over what she wishes to do.
- Women with lived experience should be involved in the design of such supported accommodation.
- Current supported accommodation should be flexible to accommodate the complex needs that women with experiences of CSE may present with.

## 4. Social housing

*“Life, it’s not easy, it’s not fantastic but it’s liveable and it’s at times enjoyable. We’re in our own house, the first house I’ve ever felt safe. This house has to be pure and clean. Somewhere Jackson, my wee dog and I want to be.”*

— Wendy, Inside Outside

Stable housing with ongoing support (including advocacy, access to healthcare through partnership approaches and well-trained supportive staff) is a public health and economic necessity. Having somewhere stable to live is fundamental and it provides safety and security for women in CSE, many of whom have experienced high levels of abuse and violence. It can remove them from direct exploitation from partners/pimps and can offer a new start away from addresses associated with prostitution.

The Encompass Snapshot highlighted that over 20% of the women supported were exploited under the age of 18, with over 50% experiencing domestic abuse and around 60% highlighted safety as a concern. Jeal and Salisbury<sup>20</sup> found that almost two thirds of the women had experience physical, sexual or emotional abuse during childhood which was echoed by the 2013 finding of Bindel et al.<sup>21</sup> that 72% of women in CSE reported experiences of physical, sexual and verbal violence during childhood. The same study found that 50% of respondents had experienced some form of coercion, including pimping and trafficking. Other women had reported to services experiences of coercion and control from pimps and partners, which essentially limits and restricts women’s access to resources and support. Physical, sexual and verbal violence are also common experiences for many women in CSE and studies show that violence is a common and dominant feature. A study by Harding (2005) found that all of the women interviewed had experienced some form of violence, whether physical, emotional or sexual and Bindel et al. found that two-thirds of the women they interviewed experienced violence.

The provision of stable housing offers protection from violence, and harassment and allows women the space to consider options and longer-term futures. It can lead to improvements in physical and mental health with better connections and links into services for problematic substance use, harm reduction and support for trauma. Basis’ Housing First pilot also demonstrated that through this comprehensive support, women’s needs for other services, including emergency services, reduced over time and so reduced costs and resources. Ashley

---

<sup>20</sup> Jeal, N. and Salisbury, C. (2004) A health needs assessment of street-based prostitutes: cross-sectional survey. *Journal of Public Health*, Vol. 26, 2:147-151

<sup>21</sup> Capital Exploits: A Study of Prostitution and Trafficking in London, 2013.

Horsey, Chief Executive of Commonwealth Housing has acknowledged the impact on women when systems do not support their own work and resilience: *“When approached by St Mungo’s we recognised a problem that was all too familiar – women who have made tremendous strides in moving from a bad place in their lives to a much better place through their own hard work and the support available in the hostel setting from St. Mungo’s staff. However when they are ready to move on from St Mungo’s, we found that too many of the women when taking up their new tenancies, whether in social housing or in the private rented sector, were unable to sustain that progress and were falling back in to former behaviours and activities – undoing all the good work and use of resources, but far more importantly at a huge emotional, psychological and physical cost to the women themselves.”*

Social housing provides an opportunity for women to have long-term housing after living in emergency and/or supported accommodation. Social housing is one element of a pathway for women; thus, it is essential that support for women is provided or continues. At a minimum, housing staff should have a good understanding of the contexts, realities, challenges and needs women who sell, or exchange sex can face. Training must also cover non-judgemental practice as many women report fears of stigma and judgement if they disclose involvement in selling sex. As Wendy explained during our Inside Outside project:

*“I’ve been in services for years and whenever you discuss workin’ the streets, people don’t want to speak about it, don’t want to hear it, they don’t want to know. People are supposed to be able to deal with this kinda thing but they’re shuttin’ down on and tryin’ to get you to discuss other stuff that has no significance whatsoever to where you are. It just makes ‘em so uncomfortable, you can see that they think it’s dirty, it’s appalling, it’s disgraceful. It’s filthy and it’s wrong.”*

The stigma surrounding prostitution or the fear of being “outed” paired with previous negative experiences with services and other housing can make women feel reluctant to consider social housing tenancies as an option or something attainable for them. Additionally, women with complex needs may find it difficult to engage with the bureaucracy and slow processes that comes with social housing applications. Encompass Network services have worked with women who had been on housing lists for many years and who had to continue in unstable and dangerous accommodation, or in situations of ‘sex for rent’ whilst they waited for their application to proceed. It is therefore crucial that local authorities invest in providing holistic social housing support which meets the range of needs women have: from access to trauma support to consideration of their caring responsibilities and their vulnerability to exploitation when their basic needs are not being met.

Social housing has been designed without consideration of the specific contexts and needs of women. Consequently, some of the housing might not have space for children, for example, which will prove unsuitable for many women with families and result in further stress and disruption. Furthermore, the need for outside space, especially for children, was apparent during lockdown. Similarly, women need to be accommodated in housing that supports them to feel safe and avoid areas which are closely linked to selling or exchanging sex, for example, close to red lights districts, to saunas or known areas for drug dealing. Finally, for women in CSE, connections to existing supports such as family, friends and services can be a lifeline; and so, offering housing located many miles away from their support networks is counterproductive.

**Women with NRPF and social housing** – as mentioned in Section 2, not all women have access to social housing. Women subjected to the NRPF condition, including women with undocumented status, are unable to access housing and women’s shelters, which hugely

limits their options and pushes them into destitution and into situations of 'survival sex'.<sup>22</sup> The link between destitution and prostitution was highlighted by the English Collective of Prostitutes (ECP) when speaking about the early stages of the pandemic: "we see that it is the most destitute women that are still choosing to work now because most sex workers are mothers and the main reason why anybody goes into sex work is to feed their families and care for those around them."

A recent blog by Vicky Nyanga, founder and CEO of Project Esperanza, published on Rape Crisis Scotland's website<sup>23</sup> starkly lays out the situations women with NRPF face and the risk of exploitation they face: "These women are left to figure things out themselves and to navigate situations of either survival or death. They resort to staying with members of the community, sleeping on people's couches to escape being forced into selling or exchanging sex, or escaping sexual abuse at home only to be exploited further into sex work and the dangers that come with it sometimes by the very people they ran to. In this instance, women are trapped, left with no choice and are forced to go back to their abusers and endure further abuse. If not, she will become destitute with no support and no safety net."

Being effectively excluded from the basic right to housing and from financial support to cover their basic needs puts women with NRPF in a position of extreme vulnerability and potential for exploitation. Additionally, many migrant women have very limited networks in the UK, which makes it even harder for them to access other informal supports. We want to reiterate that the Scottish Government must provide solutions to the risk of homelessness that women with NRPF can face and access to long-term housing and support if they have been involved in CSE.

Ensuring suitable tenancies are available is only the beginning of the next phase for women in CSE, they can require ongoing support and aftercare to sustain tenancies, develop skills to budget and pay bills, and to claim benefits. This will consolidate their stabilisation and ensure that they do not return to a cycle of homelessness and emergency accommodation.

#### Recommendations:

- Women experiencing any form of abuse should be considered a priority group when allocating social housing.
- At a minimum, there must be training for staff around the needs of women who sell or exchange sex.
- Specific guidance should be co-developed with women with lived experience to outline standards and good practice
- Local authorities must invest to provide holistic housing support which meets the range of needs women have, from having access to trauma support to consideration of their caring responsibilities and their vulnerability to exploitation when their basic needs are not being met.

---

<sup>22</sup> West Yorkshire-based homelessness charity, Simon on The Streets, defines survival sex as "undertaken to meet immediate needs, financial or otherwise. This could include accommodation or somewhere to sleep, food, tobacco, drugs or alcohol. Survival sex is often undertaken due to poverty and not being able to meet immediate survival needs".

<sup>23</sup> <https://www.rapecrisisscotland.org.uk/news/blog/the-vulnerability-of-women-with-no-recourse-to-public-funds-sexual-violence-and-exploitati>

- The Scottish Government must provide solutions to the risk of homelessness that women with NRPF can face, access to long-term housing and support if they have been involved in CSE.

## 5. Affordable housing

At the time of this consultation, Scotland is moving to another phase of the COVID-19 pandemic, which has had major implications on people's financial situation. The uplift of £20 of Universal Credit to support people during the pandemic has ended with a loss of over £1,000/year for many families. This is coupled with a sharp rise in the cost of living with increases in energy bills, food, transport and petrol, meaning that many families are struggling to afford their basic needs. As we mentioned early in this response, women usually spend more of their income on accommodation and so the rise in other costs means they will have less money for rent and housing expenses. Added to this, recent statistics show that one in four children in Scotland are officially recognised as living in poverty<sup>24</sup>, and this is likely to increase to up to 38% by 2030/31.<sup>25</sup> If a child is in poverty, it is because their mother is in poverty.

The shortage of safe, secure and affordable social housing in popular areas like Glasgow and Edinburgh means there is increasing demand for privately rented homes. In recent times, Scotland's main cities are facing a spike in private rental prices: the "Private sector rent statistics: 2010- 2021" report highlighted that over the past 10 years there has been sizeable private rental increases with Lothian and Greater Glasgow, with cumulative increases above the rate of inflation between 2010 and 2021 across all property sizes. The most common type of property in the private rented sector in Scotland is a 2-bedroom property. From September 2020-2021, average 2-bedroom rents increased above inflation in 10 out of 18 areas, with the largest increases being 7.1% in West Dunbartonshire and 6.8% in the Ayrshires.<sup>26</sup>

Increases in housing costs along with reduced finances places women in more vulnerable situations. Being locked out of affordable housing or finding themselves unable to pay current rentals can put women at further precarity. Women who are not currently involved in selling sex may have to consider this as an option to afford stable housing. During 2020 and 2021, women who had not been involved in selling or exchanging sex previously reported feeling they had no option but to exchange sex to pay for housing and ensure they and their families could have their basic needs met. Kandi, a participant of our Outside project, explained:

*"When he left, there was times I didn't think I would make it. I had the kids so I had to, I had to keep going because I was all they really had then. I couldn't go running away. I didn't have that choice. The kids, see they never knew what I did, all those times they stayed with their gran or away at my sisters. I fitted my work round the kids the best I could, we were able to keep the house, that was really important to me. They still don't know. I mean, how could I tell my kids? How could I? I would never want either of them in that life. Never. No way."*

Many women already selling or exchanging sex lost income due to the pandemic, built up debts and arrears and continue to struggle to afford rents. Some women previously rented two properties, using the second one to meet clients. However, rent increases mean women have had to give up one of the properties and started seeing clients/punters in their own homes.

<sup>24</sup> <https://www.gov.scot/collections/poverty-and-income-inequality-statistics/>

<sup>25</sup> <https://www.gov.scot/publications/tackling-child-poverty-delivery-plan-forecasting-child-poverty-scotland/pages/2/>.

<sup>26</sup> <https://www.gov.scot/publications/private-sector-rent-statistics-scotland-2010-2021/pages/10/>.

This can make boundaries more difficult for women to maintain and increases their risk of abuse, violence, being reported for anti-social behaviour and ultimately of losing their homes.

Some women have entered debt to afford paying housing costs, which worsened their financial situation. Women borrowed money off loan sharks which again increases ongoing vulnerability and precarious situations. Research by the Centre for Social Justice found that loan sharks used coercive and violent methods to enforce payment, and 10% of all female borrowers had to provide sex for loans or sign agreements to provide sexual favours if they were to default on repayments<sup>27</sup>.

It is clear that more needs to be done to ensure everyone in Scotland can access their human right to housing. We agree with the proposal to introduce rent controls to ensure affordable housing as available to all. As we have evidenced throughout this response, exploiters constantly use women's poverty and homelessness as an avenue for exploitation. Therefore, alongside with legislation review that ensure women have legal recourse when they are being exploited or at risk of being exploited, it is essential that women are aware of and have good information on their legal rights when they have been offered to exchange sex for housing or money, or when they are forced to sign agreements that include sexual exploitation.

#### Recommendations:

- Introduce rent controls to ensure that housing is affordable for all and reduce situations where landlords take advantage of women with limited housing and financial options.
- Ensure women are aware of their legal rights if they are offered or made to sign agreements that include sexual exploitation.

## **6. Precarious rental conditions in private lets**

Women in CSE can face specific barriers to accessing private rentals including fear of reprisals if they disclose that they sell or exchange sex. Further, many private landlords and rental agencies require evidence of stable income and employment status. For many women involved in CSE, these requirements pose a barrier as the money women make can fluctuate and for many, there is no guaranteed monthly amount. Also, most payments from punters/clients will be in cash, meaning that larger amounts paid into bank accounts do not provide the evidence needed to secure a tenancy. A worker at the Edinburgh-based service Another Way, notes that many of the women she supports were already in precarious housing situations prior to the pandemic: *“one of the major issues around housing for women is if they're trying to get a lease, if they're trying to provide proof of income ... that can be really difficult. Similarly, if they're wanting to access housing support from third sector services or go through council housing, sometimes disclosing that they're involved can be a barrier to women getting accurate housing support and advice.”*

Many women have large gaps in employment history, some do not have any other employment history and cannot provide employer references. Staff who work with women in CSE report that landlords will only offer expensive tenancies which ask for high deposits or tenancies which have no tenancy agreement and, therefore, no protection if issues arise. The same worker from Another Way explained how the pandemic has exacerbated the challenges and barriers that women face when trying to access a safe and stable place to call home: *“it's very difficult for women to find housing, it really is ... what I've often found is that women end up in really expensive private lets ... because they may have a landlord who will accept [fewer references] if they put forward £1000 each month. We've also found that sometimes women*

---

<sup>27</sup> <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2022/03/CSJ-Illegal-lending-paper-WEB.pdf>



*are renting illegally in the sense that there's no legal tenancy agreement or lease. We've found that during COVID because women weren't renting from registered landlords or because they didn't have a tenancy agreement or lease, they weren't eligible for rent support ... that's led to them building up a substantial amount of arrears"*

Women in these situations are vulnerable to not receiving the same housing standards as required by law and for some this might mean they cannot access long-term stable housing. We therefore think it is necessary for the government to consider alternative ways for individuals to secure housing beyond proof of income. Some women might not have individuals in their lives that can sign as guarantors either. The above essentially excludes women who sell or exchange sex from private rentals and without sufficient social housing available, then their options again become limited. We would urge further consideration, research and action into this matter.

#### Recommendations:

- Explore ways in which women can secure a private let even when they cannot provide proof of income or secure a guarantor.
- Government should engage with stakeholders, including representative bodies such as the Federation of Landlords to discuss potential options to remove barriers for women to secure a private let.

## 7. Evictions

*"Women who are vulnerable, women who have faced gender-based violence do not always present as vulnerable. Sometimes they come in with an attitude. They're not this wee, shy, timid wee woman...crying. The reason they're like that is that they had to be like that to survive ...and the way that they present, and anything negative in their history of housing like noise complaints or fighting or arguing with their neighbours, doesn't negate how vulnerable they are".*

— Support worker, Encompass Network

Women in CSE who rent properties in both the social and private sectors can face a heightened risk of eviction. Clauses around anti-social behaviour might lead to eviction for women who use their rented homes to sell sex. Women who experience a range of health and social issues like problematic substance use and trauma symptoms may present as "difficult", which might lead neighbours to report them for anti-social behaviour, putting the tenancy of already vulnerable women in jeopardy. Moreover, we know from previous work that neighbours are often affected by the behaviour of visiting punters/clients and not the women themselves. Any evictions from temporary, social or private rented accommodation can put women in other risky situations, as Barbie disclosed in our Outside project:

*"On one occasion we got kicked out of a flat. People found out we were there, and it was awful how we were treated, it was in the middle of the night, there were police knocking on the door and all sorts ... I rented a flat from these guys - they were gangsters, proper gangsters, and they were just awful. They threatened to kick me out and keep all my money. They were just not nice people to deal with, horrible just horrible. It wasn't stable, it was very risky and it was dangerous and it was not safe."<sup>28</sup>*

In Scotland, it is not illegal for a woman to sell sex from her own home, but it is illegal for more than 2 women to sell sex at the same time in the same location. Landlords are understandably concerned about breaking the law and women are concerned about being reported to the

---

<sup>28</sup> <https://www.insideoutsidescotland.info/uploads/3/4/0/5/3405303/outside.pdf>

police or made homeless. In the private rented sector, clauses around prostitution in tenancy agreements are a common source of misunderstanding and confusion. It is a grey area and guidance around this can be unclear and unhelpful which allows for different reactions and interpretation from landlords. Even insurance companies are unclear and acknowledge confusion<sup>29</sup>.

We therefore recommend introducing clear and consistent guidance on how to apply regulations in a social housing tenancy agreement and anti-social behaviour regulations when the person in question is a woman who sells or exchanges sex. The guidance should clearly state how applying such rules could impact women with complex needs. We are also fully supportive of the recommendations made by the Everyone Home Collective (EHC) to prevent homelessness, specifically ending evictions into homelessness. Overall, we find it appalling that women in extreme vulnerability experiencing trauma would be evicted and left without a home. As the EHC mentions: “no-one should ever be discharged from institutions without anywhere to sleep that night. Ideally longer-term plans should be in place before discharge to support transitions from institutions into accommodation.” Women in CSE could then be referred to Housing First accommodation we recommended in Section 2 above.

#### Recommendations:

- Upskill staff in temporary accommodation setting and social housing on the specific needs of women in CSE to prevent situations where women are evicted due to the complexity of their needs.
- Landlords should be informed about the laws around prostitution to reduce situations where they threaten to evict women solely because they are selling sex from their rented property.
- Any guidance on anti-social behaviour and social housing tenancy agreements must provide clarity on the legal situation, whilst acknowledging the impact that applying such regulations could have on vulnerable women.
- Women should never be evicted into homelessness. Instead, they should be referred to specialist supported accommodation using a Housing First model.

## **8. Learnings from the pandemic**

Housing was the first line of defence during the pandemic, where homes become a public health tool used to curb the spread of coronavirus. Not only that, but the pandemic highlighted the need for housing to provide stability, safety, and comfort. It also starkly shone a light on who has access to money, resources and safe, stable housing. Unfortunately, for women in CSE there were many experiences that reflected the barriers that already existed which COVID-19 further compounded. During the pandemic, the Scottish and UK governments implemented a series of strategies to respond to people’s housing and financial needs. Some of these strategies proved successful in tackling some of the housing issues experienced by women. However, not all strategies were beneficial and as Scotland develops a new strategy for the rented sector, we believe it is essential to review the work done during the pandemic, and to understand what was beneficial and what added further pressure to women.

Between March 2020 and September 2020, the Encompass Network carried out two needs assessments and found that, for women in CSE, poverty, financial pressures and

---

<sup>29</sup> <https://www.cia-landlords.co.uk/advice/brothels-in-rented-property>

consequently housing were large concerns. CLiCK Scotland<sup>30</sup> also conducted a needs assessment during March-December 2020 and found that housing remained an urgent need for women. Given the urgency based on the levels of need and with no access to other financial supports, women in CSE were recognised by the Scottish Government as a High-Risk Non-Shielded group and the Community Health and Wellbeing Board at COSLA identified them as a priority group. This status meant that women were to be considered in strategic planning, but for too many women, the support they needed was lacking.

During the pandemic, the Encompass Network secured Scottish Government monies to set up an Encompass Crisis Fund to cover the cost of food, clothing, living essentials, energy bills, furniture and some support for housing arrears including rent. Women said that the financial support they received helped to alleviate the stress and worry they had been experiencing. One woman outlined her dire situation: *“I have been so anxious, I had no idea how I was going to pay my gas and electric, I’ve been sat in the dark the last few days.”* The Victim Fund through Victim Support Scotland received funding in June 2021 to be specifically available for women in CSE. Some women have reported reluctance to make applications, due to fears about being outed. For example, in the case of covering rent, women are required to give landlord details as payment is made directly to landlord. Some women were not comfortable with this due to it raising landlords concerns as to why financial support was needed and why she may be eligible for such a fund. The above shows how essential and beneficial it is for women in CSE to have financial support readily available to cover basic urgent needs, whilst also the need to consider ways in which women can access such funds without having to disclose their involvement in the ‘sex industry’ to third parties, such as landlords.

Women in CSE supported by Vice Versa had a variety of experiences of housing throughout the pandemic, and prior engagement with certain housing approaches or access to financial support stood out a protective factor: *“Those who have been involved in Housing First or received financial support through the Encompass Fund, Victim Fund, or other bits and pieces...that’s been a more positive experience for them.”* Similarly, a women’s worker at Routes Out, highlighted positive outcomes experienced working with local authorities to support the housing needs of women: *“Woman A has some very complex vulnerabilities as well as some city restrictions which meant the accommodation pool for her was ultimately smaller ... local authorities and housing support were very open to advocacy on this woman’s behalf and to work together with myself to achieve a suitable housing alternative for her.”*

Another learning from this pandemic was having strong protocols between agencies to find suitable housing for women who are at risk of homelessness. The same worker from Routes Out shared a case study which highlights the benefits of their strong links with homeless services: *“Woman B was made homeless due to domestic violence...this happened late in the day but luckily the protocol that Routes Out have with homeless services meant that emergency accommodation was arranged very quickly by phone and she could go straight there and then the following day appropriate women’s accommodation was made available to her ... after just one week she was in a longer-term placement with a higher level of support again.”* Yet, some organisations working with women have found that, as we moved out of lockdown, the sense of urgency to house women in need was lost, and instead communication on application processes became lengthy. One key learning from this pandemic is that it should not take a global catastrophe to respond to women who are in a housing crisis. Instead, any person who is facing homelessness should always be considered a crisis that requires urgent attention. We would, therefore, like to see improved processes to house women in need

---

<sup>30</sup> [https://www.clickmagazine.online/uploads/1/3/2/4/132453157/click\\_needs\\_assessment.pdf](https://www.clickmagazine.online/uploads/1/3/2/4/132453157/click_needs_assessment.pdf)

as soon as possible into adequate accommodation and reduce the amount of bureaucracy involved with the process.

Finally, we want to bring attention to the use of hotels and hostels and temporary accommodation. At the start of lockdown, people seeking asylum found themselves moved from their own flats into housing for indefinite time. Unfortunately, the impact on the mental health and wellbeing of those housed in this way was detrimental, including reports of people committing suicide. We will not go into detail here, as this is something that organisations working with refugees and asylum-seekers, including the Scottish Refugee Council and Refuweege, have already reported on. However, we would like to see an end to the use of hotels and hostels as long-term housing in any situation and guidance created to ensure this option is never considered. The dignity and safety of vulnerable people in situations of homelessness should always be the priority.

As we enter a new face of the pandemic, we should not lose sight that housing remains central to COVID recovery and learnings must be taken from earlier phases. The strategies implemented during lockdown for women in CSE can serve as examples of good practice and areas of improvement. Above all, any approaches to housing should follow Everyone Home's collective calls for "more homes for good health, no return to rough sleeping, and no evictions into homelessness".

#### Recommendations:

- Expedite housing applications, without sacrificing the quality and adequacy of the housing offered.
- Avoid placing people in unstable accommodation such as hotels and hostels as a long-term solution.
- Build stronger links and protocols between local authorities and support services for smoother transition into housing.
- Provide specific urgent financial support for women selling or exchanging sex which allows them to meet basic needs, like the Encompass Fund.
- Introduce better protocols for women to obtain both emergency, transitional and permanent housing.

## 9. Trauma informed approaches

Women in CSE can experience high levels of violence and trauma which can lead to post traumatic stress disorder. In the Encompass Snapshot, 16% of the women had been diagnosed with a mental health condition including post-traumatic stress disorder and complex post-traumatic stress. Over 30% of the women disclosed that they were exploited under 18; 23.5% experienced childhood sexual abuse; and over 80% of non-trafficked women had experienced domestic abuse. In addition, research exploring problematic alcohol use amongst female sex workers across England and Wales, found that alcohol use, before entry into sex work, was used as a coping mechanism to help overcome or deal with experiences of loneliness and abuse during childhood and/or adolescence<sup>31</sup>.

Some of the ways in which women may experience trauma include:

### **Childhood Sexual Abuse**

---

<sup>31</sup> Brown, L. (2013) Cycle of harm: Problematic alcohol use amongst women involved in prostitution. Alcohol Research UK and Eaves. <http://i1.cmsfiles.com/eaves/2013/11/Cycles-of-harm-Final%2CNovember-2013-0eabfc.pdf>

Due to the levels of violence experienced during childhood, for some women the trauma has had an impact on different aspects of their lives and how they engage with services. Women can have mistrust based on previous experiences and there can be a lack of recognition of the complexity of surviving while engaging with a multitude of agencies.

### **Trauma from witnessing other women's trauma**

Many women in CSE will witness abuse experienced by other women. Because of the dangers to themselves, women might not feel safe to intervene and do anything about it, which leads to them living with a constant fear that they will be harmed at any moment. In our project *Inside Outside*, Joanne described the levels of violence women face and the vicarious trauma through witnessing others violence:

*"I mean it wasnae unusual to be somewhere and you see a girl that's getting out a car that's just been raped or beaten, robbed. Out on the street you see that happening as well. It was quite a regular thing that happened. When I look back it is a terrible situation but it's something you just canny get involved in, because you're bringing yourself in to be a target as well. You kinda lost your human compassion for people, you just have to kind of cut yourself off and protect yourself really."*

### **Threat of murder**

The threats that some women in CSE, particularly those involved street prostitution or indoors in saunas, can extend to the threat of being murdered. Joanna also described a harrowing personal experience where a punter/client attempted to murder her:

*"From that second he just turned on me, putting the bra around my neck and really viciously beating me and strangling me. I was fighting for my life with him. I really was fighting for my life. This was actually during the day, at lunchtime during the day in a residential area. There was a young couple walking by with a pram, they had obviously heard the commotion in the bushes and came to see. I managed to get away from him, I got up and ran away from him. I had the bra tight around my neck. It was so tight I couldn't actually remove it. I had to cut it off my neck when I managed to get home."*

It is clear that women in CSE are often coping with the effects of trauma in a range of ways, and a supporting their basic needs – like housing – requires a good understanding of the impact that their experience of sexual exploitation and other experiences of abuse might be having in their lives. Women need safe spaces where they can articulate the specific trauma, they experienced in CSE. At the same time, women in CSE know what kind of services and support they need and have shared this openly in various contexts. Their experiences and ideas need to inform trauma-informed responses and the development of new approaches. Sarah Jane shared clear ideas:

*"There needs to be proper concrete support for women. They need secure accommodation, maybe supported living at the start. If they need to, get them on a script. Help them make it to appointments and things like that. Different services need to come to the women, certainly at the start. Have lots of stuff happening through the day to keep women occupied, to get them involved. There needs to be staff around during the day and at night 'cos I also know that's it's sometimes at night-time, the drugs get into your head and you just need somebody there and then. Most of all you need people who are genuinely interested in helping these women."*

We cannot stress enough that all services must ensure a trauma-informed response in their work and fully understand the impact of violence and stigma when they engage with and support women with experience of CSE. Barbie, a participant from our project *Outside*, shared

why it is so crucial that services feel safe for women, which includes considering the location of the service and the presence of other service users:

*“I hated the one I went to in my own home city, it was horrible. It was in a horrible location and just awful, and sometimes there were people wandering about the place. On some occasions, they had it on the same day as the drug clinic and then there were guys around as well, it was really uncomfortable. It was just really shitty and I hated going there, but I knew that I had to. I went because there was nowhere else to go.”*

Women who are considering exiting or who have exited the ‘sex industry’ often encounter they have lost the support they previously had from women who are still involved in CSE. This isolation can be very difficult as Barbie found:

*“All the people that I knew, they’re all still in, and very much in. I’m not close to them anymore because once you exit the sex industry you drift away from everyone in that world, even people that were your friends for many years. The underworld of sex work is very different, it’s not like the real world at all, it’s totally different and you must learn a new way.”*

Women need trusted relationships with staff who understand their needs, they require a single point of contact to avoid having to retell their story and workers who can advocate with her into other services. To achieve this, there must be effective working relationships in place between many relevant services. The recommendations from The Domestic Abuse and Trauma-Informed Practice companion pack<sup>32</sup> apply equally to women experiencing another form of GBV: “at a minimum, systems should endeavour to do no further harm. Yet, the way in which systems blame women or blame them for their efforts to manage their reactions can create re-traumatisation. Women highlight that a lack of consistent practitioners, being forced to continually re-tell their story, not being believed, long waiting lists or complex processes to access support, and physical service environments that feel unsafe and unwelcoming can be re-traumatising, consider what you can do to create a safe context for those you work with.”

The trusted relationship can take time to build and so there needs to be longer term consistency to avoid women going through the cycle of disengaging with support and re-engaging with support repeatedly. Sarah Jane describes the importance of these working relationships:

*“If I had not met my support worker, I would have been dead by now. She has saved my life on so many occasions. Sometimes just by being at the end of the phone, sometimes by sitting and speaking to me for hours. She kept me certain that I could stop. She was there for me, when I went off the rails, she stuck by me. She’d still be there for me. There was no judgement there. She has been the stable relationship for me. Something I never really had before.”*

#### Recommendations:

- Measures to support women should always be trauma-informed and not only defend their right to housing but ensure all their rights are upheld.
- Provide a non-judgemental space for women to explain their situations and to feel safe with sharing that information, but also safe to not disclose.
- Services should have a single point of contact so that women don’t need to retell their stories multiple times.
- Availability of female specific services which understand the unique and often complex needs of women.

---

<sup>32</sup> <https://education.gov.scot/media/kwilejb4/da-trauma-companion-pack.pdf>

- Consistency across the entire housing process – from assessment to allocation to accommodation.

## Conclusion

*“That’s what happens when you get out, you end up on your knees, with no money, homeless. Do you know what I mean? It’s not pleasant. When other women see or hear that you became homeless and penniless – of course they are going to stay in the industry and be petrified to leave with nothing to look forward to except a life of poverty.”*

— Barbie, Outside

Women in CSE are entitled to have their housing rights fulfilled and in fact they require this in order to make choices in their lives and achieve safety and stability. As part of a wider progress to enshrine housing as a human right for everyone in Scotland, there needs to be more affordable housing, more social housing, and rent controls in place to ensure that everyone has a safe, secure place to call home. And women in CSE need to be considered throughout.

There needs to be a move from siloed approaches towards partnership holistic interventions if women’s needs are to be met such as NRPF, a lack of rights to work, assistance with drug and alcohol misuse, homelessness, debt, poverty, poor mental and physical health, poor education, uncertain immigration status, lack of social support from family or other social networks, abusive relationships and escaping exploiters.

There are excellent examples of models of practice which have been shown to transform women’s situations. The exact model of service delivery should be tailored to each local area and co-developed with women with lived experience. Encompass Network<sup>33</sup> has proposed the key principles that underpin the effective delivery of support and exiting services for women involved in prostitution. These are also transferable to other issues such as housing as part of a multiagency approach:

- Holistic, tailored provision: A holistic package of specialist support should be tailored to the specific needs of each woman.
- A coordinated, multi-agency approach: Local agencies should work together, via a shared prostitution strategy, to support women to exit.
- Long-term: Exiting prostitution can be a lengthy and difficult process. Services should reflect this and work to provide continuity of care.
- Name the problem: Local strategies, and the agencies delivering them, should recognise prostitution as violence against women.
- Address on-street and off-street commercial sexual exploitation: Women prostituting in different locations share some common barriers to exiting.
- Be flexible and accessible: Services need to be flexible in order to enable women living in chaotic circumstances to engage with them.
- Monitor and evaluate: All services should collect monitoring data that supports the ongoing development of the local prostitution strategy, and which can be drawn on for evaluation purposes.

<sup>33</sup> [https://www.encompassnetwork.info/uploads/3/4/0/5/3405303/exiting\\_prostitution\\_what\\_next.pdf](https://www.encompassnetwork.info/uploads/3/4/0/5/3405303/exiting_prostitution_what_next.pdf)

We would like to end by citing Engender's previous call to action<sup>34</sup>: "the Scottish Government should now also include a commitment to develop a programme of work focussed on housing and homelessness interventions that prevent women's homelessness and respond to the needs of diverse groups of women and girls in Scotland." We fully support this and would add that any future work and developments must be gendered and should include the voices and experiences of women in CSE.

*"I love having my good wee hoose for me and my kids. I want to get clean, get a job – as a support worker or something wi' either drugs or with women who are involved in prostitution or sexual assault. Got money coming in, work for it. Do proper work for it. I wouldnae go back to that life, the drugs and prostitution. I would never want to go there again. I couldnae even imagine doing it now. That was back then. That was a chapter. That book's been shut."*

— Natalia, Inside Outside

## Further reading

Bury, L. (2011) *Men in the Shadows: Reaching the need of male partners of street-based sex workers – Evaluation Report. Open Doors Male Partners Project*. London: Open Doors, City and Hackney Primary Care Turst.)

CLiCK Scotland, (Mar-Dec 2020), The experiences and needs of women who sell or exchange sex or sexual images during the coronavirus pandemic in Scotland - [clickmagazine.online/uploads/1/3/2/4/132453157/click\\_needs\\_assessment.pdf](https://clickmagazine.online/uploads/1/3/2/4/132453157/click_needs_assessment.pdf)

CLiCK Scotland (2021), CLiCK Cast episode 5: Housing (2021) - [clickmagazine.online/click-cast-5-notes.html](https://clickmagazine.online/click-cast-5-notes.html)

CRESR (2009), The Housing Needs and Experiences of Homeless Women Involved in Street Sex Work in Stoke-on-Trent.

Encompass Network (2021), A Snapshot of Services - [encompassnetwork.info/uploads/3/4/0/5/3405303/encompass\\_snapshot\\_2021.pdf](https://encompassnetwork.info/uploads/3/4/0/5/3405303/encompass_snapshot_2021.pdf)

Encompass Network, (Sep 2020), COVID-19: Moving Out of Lockdown The experiences and needs of women in the sex industry - [encompassnetwork.info/uploads/3/4/0/5/3405303/moving\\_out\\_of\\_lockdown.pdf](https://encompassnetwork.info/uploads/3/4/0/5/3405303/moving_out_of_lockdown.pdf)

Encompass Network (2021), Exiting prostitution: what next? - [encompassnetwork.info/uploads/3/4/0/5/3405303/exiting\\_prostitution\\_what\\_next.pdf](https://encompassnetwork.info/uploads/3/4/0/5/3405303/exiting_prostitution_what_next.pdf)

Everyone Home Collective (2022), Platform for Change 2022 - [everyonehome.scot/pdf/eh-collective-platform-2022.pdf](https://everyonehome.scot/pdf/eh-collective-platform-2022.pdf).

Everyone Home Collective (2022), Response to the Scottish Government's consultation on new duties to prevent homelessness - <https://homelessnetwork.scot/wp-content/uploads/2022/04/Consultation-on-new-duties-to-prevent-homelessness.pdf>

FEANTSA, Guide for developing effective gender-responsive support and solutions for women experiencing homelessness –

---

<sup>34</sup> <https://www.engender.org.uk/content/publications/A-WOMANS-PLACE---GENDER-HOUSING-AND-HOMELESSNESS-IN-SCOTLAND.pdf>



[www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf](http://www.feantsa.org/public/user/Resources/resources/Guide%20supporting%20and%20solutions%20for%20women.pdf)

University of Dundee and Dundee Women's Aid (2019), Gendered Approaches to Service Provision: Research Report -

<http://www.dundeeomensaid.co.uk/uploads/genderedapproachestoserviceprovision.pdf>

Scottish Government (2020), Improving housing outcomes for women and children experiencing domestic abuse -

<https://womensaid.scot/wp-content/uploads/2020/12/Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf>

Scottish Women's Aid (Aug 2019), Domestic abuse: a good practice guide for social -

[womensaid.scot/wp-content/uploads/2019/08/Domestic-abuse-guidance-for-social-landlords-FINAL.pdf](http://womensaid.scot/wp-content/uploads/2019/08/Domestic-abuse-guidance-for-social-landlords-FINAL.pdf)

Shelter Scotland (2018), Sex for rent in Scotland - Topic briefing -

[assets.ctfassets.net/6sqgfrl11sfj/Ms0Qu5JNhsCyojON3KNes/fbef4353d596b9c5b804c8dfd6bd1bc7/FINAL\\_Sex\\_for\\_rent\\_in\\_Scotland\\_Topic\\_Briefing.pdf](https://assets.ctfassets.net/6sqgfrl11sfj/Ms0Qu5JNhsCyojON3KNes/fbef4353d596b9c5b804c8dfd6bd1bc7/FINAL_Sex_for_rent_in_Scotland_Topic_Briefing.pdf)

University of Kent (2012), Evaluation of the Chrysalis Project: Providing accommodation and support for women exiting prostitution -

[https://www.commonwealhousing.org.uk/static/uploads/2014/02/Commonweal\\_Chrysalis\\_Final\\_Report\\_2610121.pdf](https://www.commonwealhousing.org.uk/static/uploads/2014/02/Commonweal_Chrysalis_Final_Report_2610121.pdf)

University of Leeds (2018), An evaluation of Basis Yorkshire's Housing First pilot -

[basisyorkshire.org.uk/wp-content/uploads/2018/03/Basis-Housing-First-Final-Report-March-2018.pdf](http://basisyorkshire.org.uk/wp-content/uploads/2018/03/Basis-Housing-First-Final-Report-March-2018.pdf)

University of York, (2016), Evaluation of the Threshold Housing First Project for Women Offenders -

[hfe.homeless.org.uk/sites/default/files/attachments/Threshold%20Interim%20Evaluation%202016.pdf](http://hfe.homeless.org.uk/sites/default/files/attachments/Threshold%20Interim%20Evaluation%202016.pdf)

## Contact

For further information or to discuss this consultation response, please get in touch with the Women's Support Project:

Email: [enquiries@womenssupportproject.org.uk](mailto:enquiries@womenssupportproject.org.uk)

Phone: 0141 418 0748

Website: [www.womenssupportproject.org.uk](http://www.womenssupportproject.org.uk)