TRANSPARENCY REPORT 2023

VIVASTREET UK

www.vivastreet.co.uk



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INTRODUCTION

Our mission

Safe, trusted advertising, free from stigma, giving all professionals the tools they need to succeed.

At Vivastreet, our top priority is to provide a safe and trusted platform for our community. We do this by having robust protections and controls in place, and through partnerships with specialist charities, policy makers, and law enforcement. We use these partnerships to reduce harm and ensure that there is an appropriate response to any attempts to misuse our platform, while prioritising the welfare and safety of our users.

Vivastreet recognises our role as one of the most prominent Adult Services Websites (ASWs) in the UK and we take our position in this space seriously. We strongly believe that any business operating in the adult industry has a responsibility to understand and mitigate the risks involved, and we feel it is important to give visibility on the steps we take to act responsibly.

This Transparency Report outlines our ongoing and proactive efforts to protect the safety, privacy, and wellbeing of our community, and we hope it provides insights into how Vivastreet works to protect our users in the day-to-day operation of our business.

For any questions or comments on this report, please contact press@vivastreet.com.



USER SAFETY AND WELLBEING

SAFETY PARTNERSHIPS AND INITIATIVES

NATIONAL UGLY MUGS

Vivastreet has partnered with National Ugly Mugs (NUM), the national sex worker safety charity, for several years and in 2023 we were proud to co-launch a Vocational Support Services programme.

The programme has been designed by NUM's expert team and aims to meet the unique needs of the community. It features a broad range of activities, tools, and resources to assist sex workers across the UK in exploring, planning, and reaching their career goals including how they can leave sex work if they wish to do so.

To achieve this, the programme offers sex workers free access to a number of services including CV writing workshops, budgeting and planning tools, e-learning courses, interview training skills, peer to peer support groups, therapy sessions and bursaries.

"This workshop provides the secret to a greater understanding of yourself in a fun learning environment, packed with knowledge and guidance delivered in a friendly manner and in bitesize manageable amounts, to not only work on during the workshop but also take you forward in your career and life."

Attendee at NUM vocational support workshop, 2023

CLIENT EYE



ClientEye is a global safety app created for sex workers, which enables anonymous reporting of problem clients with fellow app users. The app also allows sex workers to screen potential clients to see if they are associated with negative reports made by others in the community. Reports can cover a range of issues, from no-shows and timewasters to dangerous or abusive clients. As part of our

commitment to sex worker safety, Vivastreet provides all customers advertising in the Escort and Massage category with free access to the ClientEye service.

In 2023, Vivastreet customers undertook more than 1.2m searches on the Client Eye platform.



CUSTOMER SUPPORT

SUPPORT SERVICES HUB

The wellbeing of those who advertise on Vivastreet is extremely important to us, and we understand it can often be difficult for sex workers to identify the right support services available to them. For this reason, we created a dedicated Support Services Hub, where users can find links to specialist charities and organisations who provide non-judgmental advice and support on everything from health and safety, through to financial, legal, and employment issues.

In addition, Vivastreet offers guidance and advice to users on how to work safely, through regular communications via our blog and social media. This advice is informed by polling of our users, and our work with sex worker charities and law enforcement.

"I think it's an amazing safety site and also very friendly and helpful and actually offers a lot... It seems to really care and try to do everything to help and protect sex workers and educate, and offer help, information and protection".

Vivastreet customer, 2023

INCOME MAX

At Vivastreet, we understand that the ongoing cost-of-living crisis has severely impacted sex workers, both mentally and financially. This is why we are partnered with IncomeMax to help our customers receive the financial support they need.

IncomeMax is an organisation that provides expert financial support and guidance to help improve individuals' financial wellbeing and maximise their income.



Our partnership with IncomeMax has so far enabled 184 Vivastreet customers to access over £600,000 of extra income and entitlements, which otherwise would have been unclaimed.

Through identifying additional areas of income owed to our users, we aim to help them obtain greater autonomy over the choices they make for their future.



ASSISTING LAW ENFORCEMENT

We view cooperation with law enforcement as essential to tackling exploitation and a key part of our efforts to keep our community safe. We therefore work closely with police forces in the UK and internationally, as well as with agencies such as the National Crime Agency (NCA) and the National Police Chiefs' Council (NPCC)

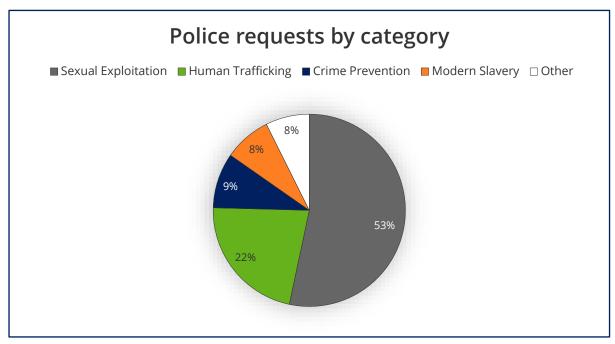
We assist law enforcement by:

- Maintaining robust safety and security measures, to detect potentially exploitative activity.
- Proactively reporting any content of this nature to the police.
- Responding to police inquiries in relation to their own investigations.
- Providing documentary evidence, to support prosecutions, and witness testimony in court, to help secure convictions.

We have a dedicated Safeguarding Team that responds to requests for information or assistance from law enforcement, upon receipt of appropriate documentation and authorisation.

In 2023 we continued to deepen and extend our engagement with police forces across the country, providing training about how we work to detect and disrupt exploitative activity, and how we can support officers in their investigations. As a result of this increased engagement, we received and responded to 883 requests for information from law enforcement agencies in the UK, up from 693 in 2022. In 2023, our standard response times to police requests was 12 hours.

A breakdown of the type of request from law enforcement can be found below:





Protecting our users' privacy

The National Police Guidance on sex work is clear that the vast majority of services advertised on ASWs such as Vivastreet are provided by independent sex workers, and that these workers should not be the focus of police activity. Vivastreet only shares user data where we believe a user may be at risk, where there is evidence of misuse of the platform, or where required to by law, upon receipt of the appropriate legal documentation and authorisation from law enforcement. Our Privacy Policy outlines how we will treat the personal information provided to us by our customers.



TACKLING MODERN SLAVERY AND HUMAN TRAFFICKING

We work closely with governments, regulators, law enforcement, non-governmental organisations, charities, and other companies in the fight against slavery and human trafficking.

In addition to responding to direct requests for information from the police, Vivastreet proactively reports any content that raises suspicions about illegality or safety to law enforcement.

Historically, we have made referrals directly to the relevant individual force, or through a bespoke partnership with National Ugly Mugs, the national sex worker safety charity. However, the regional nature of UK policing, and the fact that exploitation can occur across the boundaries of the 43 different police forces in England and Wales, has meant that we have long advocated for a central national reporting point for potentially problematic content.

We are pleased, therefore, to have launched an industry first partnership with the Tackling Organised Exploitation (TOEX) National Team, under which all our proactive referrals to law enforcement in England and Wales are handled on a centralised basis.

In 2023, we proactively referred 1660 adverts to TOEX. We operate a low threshold for any concerns of exploitation or wrongdoing, and make referrals based on recognised indicators, as agreed with expert officers within the TOEX team. This risk framework includes a grading denoting particularly high-risk content, which accounted for 3.25% of all referrals made to TOEX in 2023.

We have also established formal referral pathways with the Police Scotland National Human Trafficking Centre, for Scottish referrals, and the Garda National Human Trafficking and MDS Unit, for Irish referrals.

"It is clear that Vivastreet are keen to protect their users from harm and work with charities and police to safeguard victims of exploitation. Together, Vivastreet, TOEX, the NCA and law enforcement can disrupt those that seek to exploit others."



TOEX, 2022

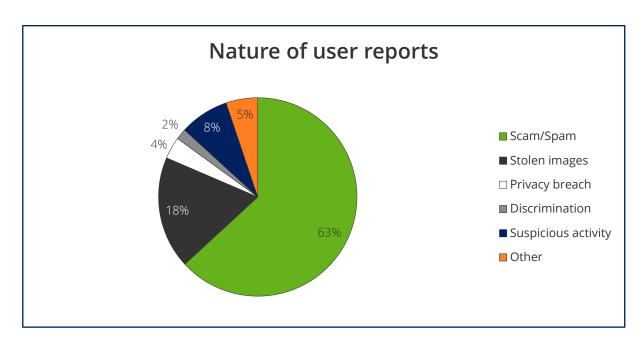


USER REPORTING

We encourage users to report any issues or concerns directly to Vivastreet by using the report this ad feature clearly signposted on every advert published on our platform.

Our dedicated Safeguarding Team manually review all content that is brought to our attention by users through this process. Any advert that does not meet Vivastreet's Terms and Conditions is removed, while we swiftly report any potentially problematic content or activity to law enforcement.

Vivastreet UK received 49,535 reports direct from site visitors via this flagging feature, of which 32,253 were in the adult services category. This is down from 60,209 total reports in 2022, which we believe is a result of our new Crimestoppers partnership – detailed below – which provides a new route for many reports of this nature. Users may flag adverts for a range of reasons, for example if an advert is suspected to be spam or contains stolen photos. Users can also indicate if they believe an advert contains potentially problematic or illegal content. For 2023, the breakdown of user reports was as follows:



Alongside making reports directly to Vivastreet, we also encourage users to report any suspicious content or behaviour direct to our partners: Unseen & Crimestoppers.



UNSEEN/MODERN SLAVERY HELPLINE



Vivastreet works in partnership with Unseen, the charity that operates the UK's Modern Slavery Helpline. Vivastreet users can report any concerns about potential exploitation via a button on each advert. Any reports made using this feature go directly to Unseen, who use their experience and expertise in this area to promptly respond to the issue.

CRIMESTOPPERS

Vivastreet now works in partnership with Crimestoppers, to provide a safe, anonymous route for site visitors to report any safety or welfare concerns they have about an advertiser on the platform.



Our partnership with Crimestoppers further strengthens our safety and security measures and allows us to take advantage of their unique expertise in anonymous reporting of potential criminality.

"The charity Crimestoppers began working with Vivastreet in April 2023 to provide a service through which those using the Vivastreet website could pass on their concerns about adverts that suggest criminal activity could be taking place. The aim of the partnership is to provide people with the peace of mind that they will stay anonymous, to encourage them to pass on information which may safeguard vulnerable people and help stop crime. Our partnership shows Vivastreet's commitment to being a responsible business, promoting safety and security."

Crimestoppers



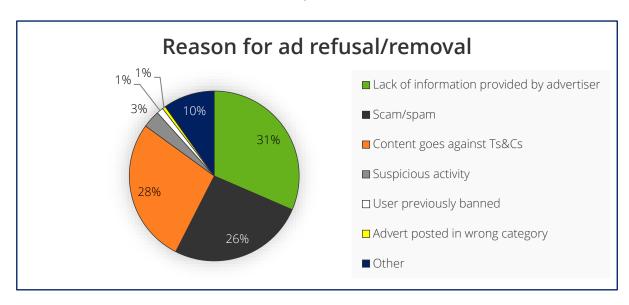
CONTENT MODERATION

As part of our commitment to protecting our users, we invest significant time and resources into continually improving our safety and security systems and processes.

We operate a robust and multi-stage risk assessment process prior to publication of all adverts on our platform, whereby they are automatically screened for any content that violates our Terms and Conditions or indicates potentially problematic activity. Our safety measures and processes include the use of third-party digital ID verification software, YOTI, as well as industry leading anti-trafficking technology and a combination of both software and human moderation. In addition, we maintain a list of prohibited terms and wider risk factors pertaining to potential harm and exploitation, which are regularly updated. We ensure that all adverts are screened for these prohibited terms and risk factors, with a view to identifying and reviewing potentially harmful content.

Our moderation processes are constantly updated and refined, based on our own experiences and feedback that we receive from law enforcement and partner organisations, to ensure that we are able to identify and remove as much potentially problematic content as possible, prior to publication.

In 2023, Vivastreet's Al and human moderation teams made over 2,900,000 moderation decisions and refused or removed over 900,000 adverts.



Vivastreet's dedicated team of moderators are a crucial part of our ongoing work to combat exploitation. We constantly look for opportunities to learn from the best practice of others and have sourced training for the team from a variety of specialist charities, including Stop the Traffik and Justice and Care.



DRIVING UP INDUSTRY STANDARDS

Alongside our work with NGOs and law enforcement, Vivastreet works with the UK Government to support wider efforts to mitigate harms experienced by sex workers and to stop exploitation.

In recent years, we have worked with the Home Office and National Crime Agency (NCA) to develop a set of Voluntary Principles for Adult Services Websites (ASWs), which aim to raise standards across the industry by setting clear responsibilities for platforms. These principles require ASWs to take all reasonable and practicable steps to prevent exploitation on their platforms and set out best practice for identifying suspicious material on sites, engaging with law enforcement agencies, and implementing robust safeguarding processes.

In 2023, we were delighted to formally accept an invitation from the Home Office to sign up to implement the Voluntary Principles and believe it would be beneficial for all ASWs to adopt them.

In addition to our work with the Home Office, we have been following the passage of the Online Safety Act in the UK, which will impose new requirements on all platforms to ensure that they have systems and processes in place to prevent their use for harms including trafficking and exploitation. While the precise regulatory requirements for ASWs under the Act have not yet been determined, we look forward to its implementation and believe that imposing new standards on platforms will help protect sex workers and allow us to continue to focus on the safety and wellbeing of our users.

"The Home Office and law enforcement partners, including the National Crime Agency maintains a close and collaborative working relationship with Vivastreet to identify and put in place initiatives to remove content and prevent and disrupt sexual exploitation on their website."

Chris Philp MP, Minister of State in the UK Home Office, 2022

