

PROFESSIONAL STANDARDS DEPARTMENT

Information Assurance & Vetting

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**Lancashire
Constabulary**
police and communities together

Ben Yates
What Do They Know

Sent via email to: - request-260749-b422130b@whatdotheyknow.com

06 May 2015

Dear Mr Yates,

FREEDOM OF INFORMATION APPLICATION REFERENCE NO: 6600/15

Thank you for your request for information received by Lancashire Constabulary on the 28/03/2015, which was as follows:-

Please provide the following;

1. Your current policy on how you police and deal with premises known to be used for the purposes of prostitution, for example; brothels and massage parlours.

Please note I am seeking information relating to how you tackle the issue in reality, for example a policy of tolerance verses straightforward criminality, not simply in relation to national or regional policy.

2. Please provide a detailed summary of commercial premises known to you to be being used as a house of prostitution, as of the date of this FOI request.

This information should ideally span the last four years (2014, 2013, 2012, 2011) and preferably be provided in a table. It should include;

- the trading name of the establishment***
- the location of the premises (where possible full postal address should be provided)***
- what (if any) action has been taken at this premises, this should include official action (such as arrests, raids, searches etc) and unofficial action (such as random visits and enquires in relation to other issues/incidents)***
- number of arrests at each premises (list the total number of arrests for each offence at each premises eg: 1 arrest for x, 4 arrests for y)***
- other comments or notes of importance about the activity at the premises such as complaints by local residents etc.***

Note that I do not want private homes or residences included in the data you provide - purely commercial premises such as office buildings, former shops etc.

3. List the organisations, charities, non-profits and unions you work with to help provide support with sex workers within the area you have policing responsibility for.

4. Finally, please provide total number of arrests by offence for other crimes related to other forms of sex work such as street solicitation or kerb crawling over the same period.

Your request has now been considered and unfortunately the information you are seeking cannot be provided at this time.

In order to provide an answer to this request (in particular Question 2), this would require a manual read through of all offences and reports that meet these criteria and it is felt that this would take in excess of 18 hours. It is also worth noting that it may be possible that some of the information you have requested in Question 2 may not even be recorded/held.

Due to this workload this task cannot be completed within the 18 hour 'Appropriate Limit' (as defined in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004). As a result, Section 12 of the Freedom of Information Act 2000 applies and regrettably this task cannot be undertaken at this stage. This letter serves to act as a refusal notice for this request, as per S.17 (5) of the Act.

Although the application of Section 12 to a request removes the force's obligations to provide information under the Freedom of Information Act, as a gesture of goodwill I have supplied some information relative to the remainder of your request, which was more readily retrievable. I trust this is helpful, but it does not affect our legal right to rely on the fees regulations for this request.

1 – A copy of the Lancashire Prostitution Strategy can be found at the end of this letter. Please note that this policy is under review and may be subject to change. The attached strategy is the foundation of how we currently deal with both 'on' and 'off' street sex work. The primary objective is to safeguard the sex worker and work with external partners to offer direction and support as and where necessary but also being mindful that our duty also covers enforcement in terms of the sex worker and also the service user, at times.

3 – Lancashire Constabulary works with a wide variety of partner's in this area. They include but are not limited to;

- Horizon
- Street Link
- INSPIRE
- Local Councils
- NHS

4 – A search was conducted of our custody systems using the following parameters;

- Anyone Arrested between 01/01/10 and 31/12/15 (inclusive)
- As above and Arrest/Detain/Additional Charge marker is 'A' (Arrested)
- As above and Original Reference Number IS NULL (not a 'Cloned' record)
- As above and HO Class IN ('02401', '02417', '02418', '02419', '02700', '07201', '07202', '07203', '07106', '07107', '07108', '07109', '07114', '10701', '16501', '16502', '16504', '16701', '16702')

The following results were returned;

HO Charge Title	2011	2012	2013	2014	Grand Total
Loitering or Soliciting for Prostitution	4	15	23	17	59
Trafficking for Sexual Exploitation	0	4	4	3	11
Causing, Inciting and Controlling Prostitution for Gain	0	0	0	1	1
Keeping a Brothel	3	0	0	1	4
Paying for Sexual Services	0	0	1	2	3
Grand Total	7	19	28	24	78

NOT PROTECTIVELY MARKED

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request an internal review of our decision, you should write to the Information Assurance & Vetting Manager, Information Assurance & Vetting, Police Headquarters, Saunders Lane, Hutton, Preston PR4 5SB or alternatively send an email to information@lancashire.pnn.police.uk. Details of the Constabulary's Freedom of Information Complaint Procedures can be found attached to this email.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner for a decision. Generally, the Information Commissioner's Office cannot make a decision unless you have exhausted the complaints procedure provided by Lancashire Constabulary. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely

James Boston
Information Assurance & Vetting

NOT PROTECTIVELY MARKED

This information has been provided in response to a request under the Freedom Of Information Act 2000, and is correct as at the date originally provided.



Lancashire Constabulary

Policing Prostitution Strategy

2011 – 2014

Due to the current review of PPU policies and procedures and forthcoming MASH implementation do not use these links for guidance on Public Protection matters- Please contact PPU compliance unit at HQ for assistance.

Statement of Intent

The policing of prostitution is evolving from a purely enforcement based approach to a victim centred approach which considers the needs of both individuals and communities. The intention of this strategy is to offer a framework of direction for divisions, based upon the themes contained in the ACPO document “Policing Prostitution and Sexual Exploitation”. This sets out effective practice in responding to prostitution. It is acknowledged that each division in Lancashire is totally unique and diverse both in demographic, cultural and economic structure. This document is intended to assist as a strategic decision making tool in order to minimise the risk, threat and harm that prostitution can cause our varied communities.

The Policing of prostitution presents many challenges that need to be addressed. Society holds various opinions with regard to prostitution, none more notable than the following;

- Prostitution is a moral issue not criminal
- Prostitution is an anti-social behaviour problem
- Prostitution is a crime of abuse and exploitation
- Prostitution is an issue of social care and welfare
- Prostitution can be a career choice

The ‘Ipswich Murders’ in 2006 together with the 3 murders of on-street sex workers in Bradford in 2009 and early 2010, only highlight the danger and vulnerability of people engaged in this work. It has been reported that sex workers are between 60 and 120 times more likely to become victims of homicide¹ and 56% of assaults on sex workers go unreported². In addition to these figures, it is also reported that between 62% and 68% of sex workers will report that they have been raped³. Lancashire Constabulary acknowledges these considerable risks of a vulnerable group and will attempt to reduce risk and threat through information sharing and joint working.

There are many factors at play, which can be summarised under two main headings. The first is the continual association between on-street prostitution and addiction to illegal drugs, often heroin and crack cocaine. This not only motivates those already engaged in prostitution, but also acts as an incentive to both women and men to become sex workers in the vain search for, what some may perceive as, easy money. The second is the off-street prostitution linked to organised crime – a lucrative business for those in control of such establishments.

This strategy sets out the expectation that the force and divisions will respond to policing the different facets of prostitution. Engagement of relevant partner agencies will assist us in meeting the challenges presented by policing the sex industry in all its forms. It is anticipated that each division will scope out the level of this problem and interact with either existing external support programmes or embark upon a multi-agency approach of prevention, support and proactive policing methods. This approach will deliver law enforcement outcomes, as well as supporting the individual with appropriate services. By proactively policing with our partners, we will endeavour to intervene early and break the cycle of drug abuse and related sex work activity. This in turn, will provide value for money savings to the criminal justice system and the health service, as well as positive outcomes for individuals, their families and the local community.

There is a need to understand the nature of sex work within our geographic areas. We should know who our sex workers are and who organises their activities. To understand the existence and level of coercion involved and to seek out evidence of trafficking, will better protect our communities and can uncover hidden harm.

The risk, threat and harm that can be inflicted on communities by prostitution include:

- Harassment of people – generally women, by kerb crawlers;
- Environmental – e.g. discarded syringes and used condoms;
- Noise/visual pollution – sex workers and those associated with them loitering in the neighbourhood, sex workers' cards in phone booths;
- Associated crimes– e.g. drug dealing, robbery, blackmail, protection;
- Loss of real-estate and other economic value to the neighbourhood – low house prices and restricted business opportunities;
- Exposure to risk by the vulnerable, especially children and young people, which can lead to serious violent and sexual crimes, causing long-lasting physical and emotional harm to the individual, and threats or acts of violence to their families.

Working pro-actively with our multi-agency partners will improve our understanding of these issues. We will be better placed to both investigate and offer our support. The main ethos that will run through this strategy is the need to reduce harm and increase public confidence, utilising approaches that consider risk, threat and harm to all. This will increase our overall quality of service to all our communities affected by the issues of prostitution.

Strategic Principles

The key principles of this strategy are as follows:

- A firm stance that our approach to prostitution is a victim-centred one.
- The safety of the people engaged in sex work is paramount.
- The elements of risk, threat and harm to all individuals is considered when addressing the principles of increasing public confidence.
- Ensure that each division has the correct analytical data upon which to base their operational plan.
- Enforcement of the law alone, will only displace not solve the issue.
- To establish a multi-agency approach to both on and off street prostitution and to consider all members of the community.
- To enforce the law and ensure that Offender intelligence is gathered, disseminated and monitored for both the personal safety of the sex-worker and also the prevention of further offences.

Strategic Aims for Policing Prostitution

For 2011 – 2014:

To recognise that everyone involved **matters** and to work positively towards that goal, we have to achieve the following:

- **Safeguarding / Prevention**

Issues of vulnerability of sex workers must be addressed. In addition cognisance must be given to travelling sex offenders who use street sex workers. These individuals do not necessarily distinguish sex workers from any other members of the community when they commit offences. Intelligence and monitoring of those committing acts of kerb crawling is vital to safeguarding.

On-street prostitution can encourage anti-social behaviour problems to flourish and concerns for safety by members of the local community have to be addressed. Pro-active intelligence led policing alone, will not prevent this activity. Displacement of the problems is not considered a positive outcome. Multi-agency working must be encouraged in order to protect individuals and communities.



- **Intelligence Gathering / Sharing**

Divisions need to understand the nature of sex work in their areas and the extent to which it blights the community. Without a formal assessment by local based Officers and the deployment of an Officer or member of the Support Staff, divisions will be unable to offer the correct level of operational support to any programme of multi-agency intervention. Awareness of both on-street and off-street prostitution is paramount, together with the identification of the problems that are associated with each type of activity. It is acknowledged that 63% of on-street sex workers reported that their main reason for prostitution was to pay for drugs, compared to 1% of sex workers who are based in private premises. The link between off-street prostitution and organised crime must also be acknowledged. This can involve the trafficking of victims for the purpose of sexual exploitation. Acknowledgement and consideration should be given to the existence and particular vulnerability around Male and Transgender sex workers; as well as sex workers who base themselves at home. It is recommended that Divisions should work with the assistance of partner agencies, to make sure that reporting mechanisms are in place, thereby ensuring that sex workers are not isolated without the correct support and the ability to report violence, even if only via a 3rd party i.e. Ugly Mugs. It is also noted that child sexual exploitation is inextricably linked to prostitution and that whilst this can be a precursor to prostitution, it is usually hidden from view. This strategy on prostitution will naturally support other force policies which work to combat the abuse of children and young people. Acknowledgement is also given that sex-workers can also be mothers or fathers and safeguarding considerations must be given, should this information be divulged.



- **Bringing Offenders to Justice**

Sex workers

Our approach to prostitution is a victim centred one. However, we also have a duty to investigate, arrest and prosecute offenders. The overall objective of a multi-agency approach to sex work is to support and educate in order for the worker to remove themselves from the cycle of abuse and exploitation. Currently there are two lines of disposal which strive to promote a lifestyle change amongst sex workers.

- Engagement Support Orders (ESO)
- Conditional Cautions (CC)

There is disparity nationally between the use of ESO and CC. Both essentially aim to regulate the offending behaviour that street sex workers engage in. They are obligated to attend a set number of meetings with drugs services and any other relevant partners. In areas where drugs test on arrest is available, it is suggested that sex work is a trigger offence to ensure early assessment by drug treatment services.



- **Punters**

The legislation in relation to kerb crawling was amended in the Sexual Offences act 2003. (See Appendix C)

Lancashire Constabulary has a duty to robustly investigate all crimes and to consider the needs of the community. Crimes associated with prostitution must be dealt with in this manner. These crimes are not only victim-centred but can also affect the local community.

It is established, that enforcement of the law alone is not an adequate solution and a more holistic approach with our multi-agency partners will provide the correct direction. It is also acknowledged that there are partner agencies, that offer educational training support programmes, such as the 'Change Course' (see Appendix B) that can be utilised to change the behaviour and attitude of offenders, towards sex-workers and thereby ultimately reduce the level of associated crime.



- **Pimps**

It is a fact that on-street prostitution has an entrenched correlation with illegal drug use by the sex worker. It is also noted that the sex-workers employed off-street, reports that the use of illegal substances by them, is rare in comparison. However, the off-street activities have also been traditionally proven, as a direct link to organised criminal behaviour. Obtaining the supporting evidence of such activities can be difficult but by the use of potential lines of investigation such as; financial, immigration and taxation, together with Covert Human Intelligence Sources (CHIS), revealing the control of any organised crime may now be proven. This area of investigation is by its very nature 'hidden from view' and can offer the abuser of this situation, the opportunity to operate at times with a degree of complacency. This complacency can be used to our advantage to provide an opportunity for Lancashire Constabulary to target the areas that are perceived to be 'safe'.

Human Trafficking for sexual exploitation together with illegal gambling and drug supply has the potential to be a lucrative business, so long as demand outweighs the supply. When entering into an investigation of this nature, consideration must be given to early engagement with The Serious and Organised Crime Agency (SOCA) and also the United Kingdom Human Trafficking Centre (UKHTC), in order to ensure that the correct operational risk assessment and planning of the operation can take place. The abused victim who is found at the centre of this 'high profits and perceived low risk of detection' situation, will also be fearful of their exploiter. Lancashire Constabulary has the duty to pursue investigations of this nature and support victims to come forward without the fear of retribution from their exploiter and ultimately offer the continued support to encourage them to provide evidence for Court in order to secure a conviction.

- **Public Confidence**

On-street prostitution fuel fears regarding risks to public safety. Prostitution can be a signal crime and an indicator that an area is in decline. This reflects upon how effective and responsive the police are seen to be, to the concerns of the community. It will naturally have an adverse effect on public confidence.

The ability to work together with our multi agency partners is vitally important and the holistic support would be provided by the following agencies:

- Specialist prostitution project/service
- Community Safety Partnerships
- Health (including sexual and reproductive and mental health service)
- Local authority housing services
- Drug and Alcohol services
- Social Services
- Children's services
- Probation service

It is the responsibility of each division to ensure that the correct level of engagement is made with all agencies and to ensure that their knowledge of all support programmes is complete.



Implementation

It is envisaged that by working with our partners, the delivery of a simultaneous programme of enforcement and holistic support would lead to positive early intervention. The MARAC victim panel is yet another line of directed support, should the individual be referred based upon professional judgement from a support agency.

Appreciation must be given to the fact that the individuals who engage in the activity of prostitution are not only victims of both physical and psychological abuse but the majority are vulnerable individuals in their own right. They require the same respect and level of service that every member of the community expects. Crimes committed against prostitutes will be dealt with by the same level of diligence and expertise, as would any other reported crime. Divisional and community priorities will dictate the level of investment provided to this area of business. However, direct links with partner agencies will often reduce the amount of police resources required to protect individuals and communities and bring offenders to justice. A divisional SPOC for sex workers and relevant partners can ensure that all intelligence is fed in to our systems and that vulnerability and exploitation are reported and dealt with effectively. This central point of contact for the division could be either a designated Police Officer or member of the Support Staff.

The UK Network of Sex Work Projects (UKNSWP) is a charitable organisation which pro-actively supports sex workers. Nationally it's members, who generally work in sex work projects, alert other areas with information on violent offenders through a scheme called " Ugly Mugs and Dodgy Punters." (appendix A) There is work on-going with the NPIA and the UKNSWP to set up a national protocol so that the intelligence on attacks on sex workers could be shared with forces. Police forces have used the information contained in these reports to pro-actively manage risk in areas frequented by sex workers. In addition sex workers who have reported acts of sexual violence anonymously through the scheme have been approached through the projects and been encouraged to make formal complaints the police. This has increased the both the reporting rate and conviction rate for crimes against sex workers.

Governance

- This Prostitution Strategy is owned by the Public Protection Unit, G Division.
- Identification of a divisional lead is required in order to drive and support this work. At 6 monthly meetings, this point of contact can share best practice in order to not only promote their work but to also enhance the operational effectiveness within this area of business.
- Information will be available via the reporting mechanism of the TTCC meetings and collated into the quarterly QPR document of the Public Protection Unit.

Tactical Options

1. Through local TTCG nominate staff to assist divisions to understand the nature of sex work in their geographic areas
2. To establish a local protocol with partners to close the intelligence gap in relation to sex workers.
3. To enhance the force intelligence collection plan, in relation to sexual exploitation by formalising the process in which a “ Ugly Mugs “ report can form part of our intelligence system (in a similar way to Crime Stoppers).
4. To undertake targeted enforcement operations in problematic areas in conjunction with our partners with the aim of identifying vulnerable individuals and ensuring that drugs treatment is readily available.
5. To pro-actively police off street premises with a view to identifying trafficking and wider organised criminal gangs.
6. To utilise relevant CII powers in order to regulate activity being offered through the internet which is taking place in our local communities.

Performance Monitoring

1. Establishment of contact with local sex work project/ partner agencies for ALL divisions within the Constabulary.
2. Numbers of referrals of sex workers to drugs services.
3. Number of people arrested for offences relative to controlling, exploiting and trafficking.
4. Number of people arrested for paying for sexual services and number then referred on to a 'Change Course'.
5. Number of assaults reported by people engaged in prostitution.
6. Number of intelligence reports created which originated from the 'Ugly Mugs' reporting scheme. (see Appendix A)
7. Increase in conviction rate of crimes against sex workers.
8. Numbers of ASB calls relating to street prostitution.

To be reported quarterly through the Public Protection Portfolio and 6 monthly through the force tactical tasking process.

Summary

It is recognised that prostitution is inextricably linked to illegal drugs and organised crime. The victims of this exploitation are vulnerable individuals. Any strategy should work simultaneously, to investigate associated crimes against these individuals and impose, when required, legal interventions upon the sex workers. However, it is also acknowledged that with the assistance of our partners we need to offer support, together with direction, through the courts if necessary, to exit individuals from sex work all together altogether.

To achieve the balance between enforcement, community engagement and a reduction in the level of prostitution, it will require pro-active intelligence led policing together with partner agencies intervention and the assistance of area support programmes. This will not only establish the true level of prostitution in Lancashire but enable targeted enforcement of the law, thereby promoting confidence from within the Community.



Appendix A

Ugly Mugs Database

The aim of the Ugly Mugs scheme is to:

- Improve the safety of sex workers and to reduce crimes committed against them by alerting them to dangerous individuals operating in their area.
- Systematically record and monitor crimes against sex workers.
- Enable third party reporting of crimes against sex workers.
- Assist sex workers, where possible, to report assaults to the police.
- Improve liaison between sex workers, sex work projects and the police.
- Contribute to successful investigation & conviction of those who commit crimes against sex workers.
- Deliver the message that any violence against sex workers is unacceptable and criminal.



This scheme has been successfully running in Merseyside for a number of years. The police and the Ugly Mugs Project Team (Armistead Street Project) received funding in 2006 from the Home Office to employ an Independent Sexual

Violence Advisor (ISVA) to support sex workers who have been raped and sexually assaulted. The ISVA co-ordinates the work of the multi-agency partners and supports the sex worker through the criminal justice system if a formal complaint is made. The ISVA will work with the partner agencies to provide a developed exit strategy, created for that individual.

- Over the past 3 years, 34 cases have gone through the Criminal Justice System, as a direct result of information received via the Ugly Mugs system.
- Of these 34 cases there has been a 93% success rate at Court. As a result of these convictions, the total amount of years allotted to the defendants was 124 years.
- 83% of all referrals made to Ugly Mugs, proceed into the Criminal Justice System.
- Over the past 18 months there has been a 400% increase in the number of referrals onto the scheme, which in turn has provided Merseyside Police with an increased awareness of the true situation of prostitution in their area, together with an abundance of high quality intelligence.

Appendix B

‘Change Course’

Lancashire Constabulary may wish to consider the ‘Change Course’ which is an approach made to offenders who obtain or attempt to obtain, the services of a sex worker. Nottinghamshire, Avon and Somerset and Greater Manchester Police to name but a few, have been offering this course for some time. The Change Course is offered to kerb crawlers who admit the offence. It aims to educate them not only about their own behaviour and how it impacts upon their family but also how their activities have a negative effect upon the local community, as well as the lives of the sex workers. The 1 day course is self-financing, as the attendees pay for their places for the day, as opposed to paying a fine at Court for the offence. The attendance and full participation on this course provides an alternative to obtaining a criminal record and they will receive either a Conditional Caution or Acceptable Behaviour Contract, to refrain from entering this area again. The residue of monies accrued from this course, can then be utilised by partner agencies to provide such things as; improved street lighting in the area that the offences took place, CCVT, ANPR cameras and personal alarms for the sex workers.

Evaluation has established that after successful completion of the Change Course, the re-offending rate for all participating areas is calculated at only 2% . The acceptance of an offender on to the Change Course, is only offered once. Should the individual re-offend for an offence of the same or similar nature, then they will be directly referred for court disposal.

Appendix C

The Law relating to prostitution

Controlling, exploiting and trafficking

The offences principally directed against those who exploit others through prostitution include controlling prostitution for gain and causing or inciting prostitution for gain both of which have a maximum penalty of 7 years (Sexual Offences Act 2003). These offences replace a number of old offences found in the Sexual Offences Act 1956 such as living off the earnings of a person involved in prostitution.

The main offence relating to brothels is keeping a brothel used for prostitution, the penalty for which is 7 years (section 33A of the Sexual Offences Act 2003).

The Sexual Offences Act 2003 introduced the offences of trafficking into, **within** and out of the UK for sexual exploitation (section 48-50 of the Sexual Offences Act 2003). These offences cover both adults and children and carry penalties of up to 14 years.

The Sexual Offences Act 2003 also introduced new offences specifically in respect of the exploitation of children and young people. These are causing or inciting child prostitution, controlling a child prostitute and arranging or facilitating child prostitution (section 48-50). The new offences cover the prostitution of both boys and girls and all carry a maximum penalty of 14 years.

Section 21 of the Policing and Crime Act 2009 amends the Sexual Offences Act 2003 to introduce closure orders. These allow the police to apply to a court for an order closing premises associated with specified prostitution or pornography

related offences for up to three months (which can be extended by up to 3 months if the court deems it necessary). However the total period for which the order has effect must not exceed 6 months.

Paying for sexual services

The Sexual Offences Act 2003 has been amended by the Policing and Crime Act 2009 to introduce a new offence which makes it illegal to pay for sexual services of a prostitute subjected to force, threats (whether or not relating to violence) or any other form of coercion or any form of deception of a kind likely to induce or encourage the person involved in prostitution to provide those services. It is not a valid defence for a defendant to argue that he did not know the person involved in prostitution had been subject to force etc. The maximum penalty is a level 3 fine (section 53A Sexual Offences Act 2003).

In respect of the abuse of a child through prostitution, the 2003 Act introduced an offence of paying for the sexual services of a child, for which the maximum penalty is life when the child is under 13 and the offence involves penetration; otherwise 14 years when the child is under 16, or 7 years if the child is 16 or 17.

The Sexual Offences Act 2003 has been amended by the Policing and Crime Act 2009 to create an offence of soliciting a person in a street or public place for the purpose of obtaining sexual services from that person as a prostitute. This can include a person soliciting from a vehicle in a street or public place and replaces the offences of kerb crawling and persistent soliciting found in the Sexual Offences Act 1985.

Men and women involved in street-based prostitution

The Street Offences Act 1959 criminalises loitering or soliciting for the purposes of prostitution. It is an offence for a person persistently to solicit or loiter in a street or public place for the purpose of prostitution. Conduct is persistent, for the purpose of this offence, if it takes two or more occasions in any period of three months. The maximum penalty is a level 3 fine or an Engagement and Support Order.

[1] Loman & Fraser 1995

[2] Church, Henderson, Barnard & Hart 2001

[3] Farley, Baral, Kireman & Sezgin, 1998; Farley & Barkan 1998