



EUROPEAN POLICY BRIEF

PREVENTING EXPLOITATION AND TRAFFICKING IN THE SEX WORK SECTOR



This brief recognises that prostitution policy regimes can be identified as repressive, restrictive and integrative, or a combination of these. It therefore recommends a policy approach that is context-sensitive, suggesting measures against violence, exploitation, and trafficking that can be implemented in each type of regime. The main strategies for preventing exploitation are those that can reduce sex workers' vulnerability, limit opportunities for exploitation, and build alliances between sex workers, NGOs, and authorities. The brief also recommends a collaborative form of governance that has proven successful when developing innovative policy measures in other politically sensitive domains.

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INTRODUCTION

The last decade has seen debates over which measures are most effective in combatting trafficking in human beings (THB) in the sex work sector. Demand-side measures such as client criminalisation have been at the forefront. However, these debates have not led to any form of unified policy stance across member states. For instance, client criminalisation has been recommended by some states and opposed by others. This policy brief, based on three studies conducted within the DemandAT work package on prostitution policy, offers policymakers analytical tools and data that can assist in clarifying these debates. The first study is a comparative investigation of how demand-side measures operate in three countries with different legal approaches to sex work (Sweden, Germany and New Zealand). The second study is based on a qualitative interview survey with Swedish men who purchase sex. The third study outlines a classification of prostitution policies, proposing a new general tripartite policy typology using the labels *repressive*, *restrictive* and *integrative*.

While the comparative study of prostitution policies in Sweden, Germany and New Zealand identifies a number of implications for each of the different policies, the available evidence is insufficient for drawing conclusions as to the impact of these policies on the amount of sexual services bought or sold, and on whether these policies have impacted on THB quantitatively. There

is also limited data on what impact the different policy types have on clients' behaviour in regards to exploitation and THB. In light of the sector-specific challenges – such as the stigma associated with selling and purchasing sexual services, as well as the hidden nature of exploitation and THB – it is difficult to find conclusive evidence on the precise impact of different policy approaches. Despite these limitations, it is possible to present a number of statements about how the different policies tackle demand and how they influence the relationship between authorities and participants in the sex work sector. This can have implications for the ability to detect, report and prevent coercion, violence, exploitation and THB, all of which occur to varying extents in the context of all three policy regimes.

Apart from the lack of reliable data, another sector-specific challenge is that sex work is a politically and morally charged field. National authorities, policy-makers and stakeholders have their own understanding of what commercial sex is, what is problematic about it and what should be done to reduce or regulate it. It should therefore be made explicit that this policy brief does not recommend any of the three policy types. Rather, it encourages shifting the question from which demand-side measures are 'best' at reducing exploitation and THB in the sex work sector, to asking instead *which measures are possible in the different policy settings*. Since different understandings of commercial sex lead to different policy paradigms, this will influence the kind of crime-preventive measures that can be taken, as well as the effect they will have. Applying this policy context-sensitive approach, this brief agrees with the conclusions of the research on domestic work carried out within the framework of DemandAT; namely that the issue of 'demand' cannot be approached without simultaneously addressing the 'supply' side (Ricard-Guay 2016a, 2016b). In the case of sex work, the vulnerabilities faced by sex workers must be addressed. Furthermore, the brief seeks to align the policy context-sensitive approach with the fundamental principles and recommendations aimed at increasing sex workers' rights, health and safety, as adopted by major international human and labour rights organisations, and developed in collaboration between sex workers, service providers, researchers, government officials, NGOs, United Nations agencies and development partners (see for instance ILO 2010; WHO et al. 2013; HRW 2014; Amnesty International 2016).

EVIDENCE AND ANALYSIS

1. A more explicit typology of prostitution policies is needed

Through the comparative DemandAT study of prostitution policies, significant overlaps, ambiguities and contradictions in currently used policy categories have been identified, which make them unfit for comparative analysis. We suggest a more coherent and less ambiguous typological framework, where policy regimes are viewed in terms of countries' approaches to prostitution, including both their intentions and specific actions. These three general policy types can be viewed in terms of *repressive*, *restrictive* and *integrative* prostitution policy regimes.

- *The repressive* policy regime is based on an understanding of commercial sex as a negative social phenomenon in itself. The intent of a repressive policy is to eliminate the sex work sector with the aid of criminal law, with bans against the sale and/or purchase of sex and third-party involvement, and awareness-raising campaigns.
- *The restrictive* regime views commercial sex as negative in itself, but it operates with a more pragmatic approach. It uses criminal and administrative law to regulate the *conditions* under which sex work takes place, for instance employing laws against soliciting, zoning regulations and/or strict licensing systems.
- *The integrative* regime views commercial sex as a multifaceted phenomenon *containing* negative elements. Sex workers are seen as a category of service providers who are subject to stigma and specific risks in their work. An integrative policy thus seeks to integrate the sex work sector into the existing social and legal structures with the aid of labour and administrative law and 'codes of conduct' for authorities and operators within the

sector, including initiatives to combat the stigmatisation of sex workers and improve their working conditions.

A summary of the specific features of the different policy regimes is shown in the table below. These policy regimes are 'ideal types' in the sense that they do not exist in their conceptual purity. When assessing and applying this typology to an actual country case, one must be aware that there are no 'perfect fits', and that one country might be operating with two or three different regimes at the same time.

Table 1. Main features of the repressive, restrictive and integrative policy types.

Policy type	Repressive	Restrictive	Integrative
<i>Understanding of commercial sex</i>	Negative social phenomenon.	Negative social phenomenon.	Multifaceted social phenomenon containing undesirable elements.
<i>Intention</i>	Eradicate the sex work sector in order to protect society and/or those selling sex from harm.	Restrict the sex work sector in order to protect society and/or those selling sex from harm.	Integrate the sex work sector into societal legal and institutional framework in order to protect those selling sex from harm.
<i>Ideology</i>	Religious, moral harm or radical feminist.	Religious or moral harm.	Rights-based.
<i>Policy instruments</i>	Criminal law prohibiting selling and/or purchasing sex and third-party facilitation. Campaigns aimed at deterring the sale and/or purchase of sex. Exit, or behaviour rehabilitation programmes for those selling and/or purchasing sex.	Criminal and administrative law, and/or local ordinances regulating under which <i>conditions</i> sex sales can take place, i.e. laws against soliciting, zoning laws or licensing systems. Might prohibit third-party involvement. Exit, or behaviour rehabilitation programmes for those selling and/or purchasing sex.	Labour, commercial and administrative law regulating sex workers' employment rights and obligations, and specific legislation protecting them from exploitation. Detailed implementation directives, and codes of conduct for authorities and operators. Campaigns and initiatives with the aim to combat stigma and promote collaboration between sector and authorities.
<i>Impact on sector</i>	Always operates illegally.	Can operate legally, but under conditions more restrictive than those of other service sectors.	Can operate legally under conditions similar to other service sectors.
<i>Impact on legal situation of sex workers</i>	No access to labour rights, not possible or difficult to access social security systems, seek social and medical assistance on own terms, self-organise, collaborate with each other and/or with authorities.	Partial or no access to labour rights, might have difficulty accessing the social security system, seeking social and medical assistance on own terms, self-organising, collaborating with each other and/or with authorities.	Full access to labour rights, can seek social and medical assistance on own terms, can self-organise, collaborate with each other and authorities, and influence self-regulation (i.e. develop codes of conduct and ethical standards in sector).

Source: Petra Östergren (2017a).

2. Assessing policies requires focus on total impact

The assessment of a policy requires empirical studies at the level of practice. This means evaluating how the policy is expressed through the various policy components, focusing on its *total impact* according to four key variables, what we call the '4 i's': 1) intention, 2) instruments, 3) implementation, and 4) impact. This 4i perspective takes into account local variations, acknowledging that a given country may be operating with more than one policy type (e.g. the policies of some regions or cities can be restrictive while others are integrative).

Using this typological framework, we can compare Sweden, New Zealand and Germany as examples. The Swedish policy regime is repressive: commercial sex is considered to be a negative social phenomenon that should be eliminated primarily with the help of criminal law. Purchasing sex is illegal, as well as all third-party activities. The dominant policy rationale is based on a kind of feminist ideology that equates all prostitution with male violence against women. In contrast to Sweden, New Zealand has a multifaceted understanding of commercial sex and regulates the sector by standard labour and administrative law, but adds specific legislation and codes of conduct for authorities and business owners in order to protect sex workers from violence and exploitation. The policy is informed by a human rights ideology. Finally, Germany combines both restrictive and integrative policy elements. The integrative policy elements can be observed at the level of national law, since it is not a criminal offence to sell or purchase sexual services, and the stated aim is to move the sale of sexual services from the domain of 'immorality' to that of 'labour'. At state and city levels, however, there is a range of different regulations and practices, ranging from restrictive to integrative.

3. The quantitative impact of policies on the sex work sector and THB is unknown

Due to unreliable and/or lack of data, it is not possible to draw any conclusions as to the quantitative impact of different policies on the sex work sector in the different countries, e.g., in terms of the amount of services bought and sold. Nor is it possible to measure, much less conclude, what impact the different policies have on the extent of THB. Advocates for a repressive policy claim that client criminalisation deters traffickers, whereas representatives of the integrative policy argue that criminalisation may actually stimulate more criminal activity within the sex work sector (by driving it underground). There is not enough evidence to determine the validity of either claim or draw conclusions in this regard. Given the sector-specific challenges of the field, it is unlikely that we will be able to find conclusive evidence that would clearly support either claim. Nevertheless, it is possible to make a number of observations about the different policy regimes.

4. Observations regarding policy effects in different regimes

- *Different policies tackle demand differently.* In Sweden, demand is approached through criminal law, making it illegal to purchase sexual services, and by awareness-raising campaigns aimed at discouraging men from purchasing sex. In Germany, there are initiatives that encourage cooperation between clients, NGOs, and government bodies, resulting in codes of conduct and information campaigns that warn and inform clients about trafficking. New Zealand has a greater focus on empowering sex workers and influencing intermediaries. New Zealand has encouraged the development of codes of conduct for sex work premises, specifying measures to protect sex workers and prevent violence and exploitation (OHS 2004). Emphasis is placed on collaboration between sex worker-led service organisations, police and other authorities to warn and prevent crimes against sex workers.
- *Repressive regimes might be an obstacle to detecting, reporting and preventing crimes.* Interviews with Swedish men who purchase sex suggest that, in a policy context where most aspects of the sex work sector are criminalised, it is unlikely that clients who suspect crimes against a sex worker will approach the authorities for fear of prosecution. In regards to clients, it comes down to their *individual ability* to identify crimes such as coercion, violence, exploitation and THB, and *individual responsibility* combined with *individual willingness to risk* being charged when reporting suspected crimes to the authorities.
- *Different policy regimes influence the relationship between participants and authorities differently.* The comparative research carried out within the framework of the DemandAT study, as well as the research of others, suggests that those who sell or purchase sexual services in Sweden express greater distrust of the police, social service agencies and NGOs, than in Germany and New Zealand. Since the legal changes in Germany and New Zealand toward a more integrative policy, sex workers and clients seem to show greater trust in the authorities. Under a repressive policy, as is the case of Sweden, it is more difficult for actors in the sex work sector, agencies and authorities to cooperate than in the restrictive or integrative approaches. As mentioned, this lack of cooperation can have implications for preventing and reporting crime. An integrative policy is more likely to enable opportunities for collaboration and trust-building between participants in the sex work sector

on one hand, and sex worker-led organisations, NGOs, government bodies and authorities on the other. The result in a more integrative policy is a better flow of information that can inform workers about risks and dangerous elements (such as violent clients, exploitative managers and street harassment from other members of the public).

5. Policies in all the countries suffer from inconsistencies

All public policies are complex. They confront sector-specific challenges, suffer from inconsistencies and produce unexpected outcomes and unintended consequences. This is also the case with the prostitution policies in the three countries studied. The various sex work-related laws, measures and regulations are not always compatible, and/or might lead to unwanted consequences. Also, the stated aims might not be consistent with practises and outcomes. For instance:

- *In Sweden*, despite a strong discursive commitment to protect those selling sex, the various prostitution laws and anti-prostitution discourses have had an adverse effect on sex workers, including the hampering of safety procedures, fear of being subject to police surveillance and difficulties faced by NGO's and social agencies in implementing harm reduction measures. Furthermore, selling sex as a migrant is grounds for expulsion from Sweden (Östergren 2017b). And, even if it is not possible to legally engage in sex work, income derived from selling sex must be taxed, leaving workers in a double-bind.
- *In Germany*, even if the stated aim with the 2002 Prostitution Act was to give sex workers labour rights, the actual regulations drafted and implemented at local levels have led to a precarious legal standing for those selling sex, making it difficult for sex workers to operate legally. Furthermore, the Prostitutes Protection Act of 2017 will grant authorities extended control over sex workers, for instance via strict licensing systems and mandatory registration, which risk creating a two-tiered system whereby those unable or unwilling to comply must operate outside the law.
- *In New Zealand*, the contradictions are fewer, but it is illegal for migrants to work in the sex work sector (it is not possible to be granted a visa on the basis of engaging in the sex work sector, whereas one can obtain work permits for work in other sectors). This restriction means that labour laws and other legal protection ensured by the Prostitution Reform Act of 2003 do not apply to immigrants. Hence, migrants caught selling sex risk deportation.

POLICY IMPLICATIONS AND RECOMMENDATIONS

This brief does not recommend any one of the three policy regimes (repressive, restrictive or integrative), since each has different intentions as well as different understandings of what commercial sex is. Rather, we propose that efforts be concentrated on investigating and assessing which measures are *possible* in the different policy settings as they pertain to reducing violence, exploitation and THB. We therefore propose six general recommendations that can be applied in all three policy contexts.

Empowerment, understood as the transformative potential of people to achieve positive changes by asserting their rights, usually by group action, and so gaining greater power to solve problems, has been a long-standing guiding principle in the 'bottom-up' approach to policy (Gardner & Lewis 1996). This is also what international human rights bodies regard as the *essential* principle that must underlie all operational approaches to sex worker health programmes (WHO et al. 2013). The first recommendation is therefore to:

- Ensure the process of **community empowerment**, whereby sex workers are empowered and supported to address, for themselves, structural and everyday constraints on their safety, and to improve their access to services and measures that will reduce their vulnerability to crimes such as exploitation and THB.

The pervasive stigma associated with sex work, in combination with discrimination based on gender, ethnicity, HIV status or other factors, negatively impact the health and safety of sex workers. This includes harassment and violence by clients, operators or others, and negligent and discriminatory attitudes by public agencies and law enforcement officials. The second recommendation is therefore to:

- Take action to **reduce the stigma** associated with involvement in the sex work sector. Measures to reduce stigma include improving public attitudes towards sex workers, providing agencies, authorities, NGOs and the general public with nuanced and non-stereotypical information about sex work (including the difference between forced and voluntary engagement).

What is known as a 'collaborative form of governance' has proven useful in politically sensitive and adversarial domains. In addition, one of the main principles underlying the human rights recommendations for comprehensive health programmes for sex workers is community participation and leadership (WHO et al. 2013). A third general recommendation is thus to:

- Employ a formal, **consensus-oriented and deliberate decision-making process**. This entails that public agencies and authorities seek and respectfully engage with stakeholders to develop and implement policy (Ansell and Gash 2007). All care must be taken to ensure that sex workers and sex worker-led organisations are included as stakeholders.

The sex work sector shares similar traits with the domestic work sector. One of these traits is that the work often takes place in private locations, such as households. Another is that the two sectors are often unregulated, and/or that employers and customers do not abide by regulations. A third is that many workers in these two sectors are migrants, placing them in disadvantaged positions in an illegal/informal sector. As noted by the DemandAT studies on trafficking for labour exploitation in the domestic work, these factors place domestic workers in an especially vulnerable position. Hence, domestic workers will be less susceptible to exploitative practices if they are provided with necessary legal or social protection that reduces their vulnerability. The DemandAT study on domestic work concludes that efforts to tackle the demand-side cannot be separated from addressing such vulnerabilities, and calls for the adoption of a 'comprehensive approach' to tackling THB, one that addresses its 'multiple dimensions' through a combination of 'multi-level actions' (Ricard-Guay 2016a; 2016b). A fourth general recommendation, therefore, is to:

- Acknowledge that the solution to exploitation and THB in the sex work sector does not lie in any one single 'anti-demand' measure. Instead, there is a need to **explore a multitude of measures** on several levels in order to reduce worker vulnerability, which are feasible and applicable in their specific policy contexts. Here it is essential to underline the importance of not conflating sex work with THB.

All prostitution policies face inconsistencies, and the often complex set of sex work-related laws, regulations and measures - however well intended - can have harmful effects. For instance, client and third-party criminalisation, laws against soliciting and zoning laws can hamper sex workers' abilities to undertake their own safety measures; licensing systems can create a 'two-tier' situation, forcing those who cannot comply to operate illegally and at greater risk; and immigration and anti-trafficking laws can exacerbate the existing vulnerability of migrant sex workers. A fifth recommendation, therefore, is that:

- When assessing or revamping prostitution and anti-trafficking policies, policy-makers need to **conduct a thorough inventory** of all sex work-related regulation, assessing the de facto impact on the safety of those selling sex ('the 4i's'). In this process, sex workers must also be consulted. A similarly pragmatic and collaborative approach is to be applied when considering the impact of any proposed measure.

To support undocumented migrant workers is an effective instrument to reduce the incentives for exploitative employment and can decrease the volume of the shadow economy (Cyrus 2003). A

sixth general recommendation, relating to undocumented migrant sex workers, and primarily (but not exclusively), applicable in restrictive and integrative policy contexts, is to:

- Empower workers by **providing legal certainty** and access to the system of legal protection. Even if sex work is not considered an occupation, an argument can be made that supporting basic labour standards should apply. The parallel can be drawn to the situation for other illegally employed workers. As a response to an EU directive (the Employer Sanctions Directive), it was ruled that although an activity is considered illicit, illegally employed workers have, for instance, the right to enforce payment of back wages and associated social security payments.

The above recommendations apply to all three types of regimes. Below are recommendations aimed specifically at each type of regime.

Recommendations for repressive regimes

Under a repressive regime, the sex work sector cannot operate legally, and sex workers do not have access to labour rights. This effectively excludes the possibility of using ordinary legal means to reduce worker vulnerability, discourage inappropriate client requests and limit opportunities for exploitation by employers and other third parties. However, there are still other measures that could be applied. It should be acknowledged that the underlying logic of a repressive prostitution regime can be that harm and vulnerability is only reduced if the sex work sector is fully eradicated.

As mentioned, the relationship between authorities and actors in the sex work sector in a repressive regime is characterised by a lack of trust. Laws such as client criminalisation can also be an obstacle to preventing and reporting crime. Policy-makers supporting a repressive policy regime must therefore recognise that there might be a need to proactively adopt measures that explicitly counterbalance some of the policy drawbacks. It is also vital for sex workers to be able to turn to law enforcement officials in order to report crimes, without fear of being prosecuted or placed under surveillance. Measures to consider in achieving these aims could be to:

- Ensure that sex workers can access health and safety services that are non-conditional and non-discriminatory.
- Implement ‘amnesty’ practices. If the purchase of sex is illegal, a client who reports a crime committed against a sex worker, or who suspects such an impending crime, could be granted immunity from prosecution for purchasing sex. The same could apply to intermediaries.
- Offer to suppress the name and occupation of a sex worker, client or third parties if they appear as witnesses in court.
- Change/avoid implementing third-party laws when the activity strictly concerns assisting in sex workers’ safety measures without reimbursement.
- Create ‘police-liaisons’ to whom migrant and domestic sex workers can turn in the event of a crime. A system of this kind would obviously require some sort of ‘firewall’ between these police-liaisons and those law enforcement officials that uphold the prostitution legislation (such as sex worker, client and third-party criminalisation), so that sex workers would not risk being subject to prosecution, police surveillance or expulsion.

Recommendations for restrictive and integrative regimes

Under the restrictive and integrative policy regimes, the sex work sector can operate legally, either partially or in its entirety. It is also possible for authorities and the parties in the sector to collaborate. Policy-makers and stakeholders are therefore provided with similar measures aimed at preventing violence, exploitation and trafficking in these regimes. However, it must be emphasised that restrictive measures (such as zoning and soliciting laws or licensing systems) will reduce sex

workers' choices and hence increase their vulnerability. The harmful impact that repressive and restrictive policies have on sex workers' health and safety is the reason why human rights bodies instead advocate for a full decriminalisation of the sex work sector (what we call an integrative policy regime) (WHO et al. 2013; Amnesty 2016).

Measure that we have found, in both and restrictive and integrative policy contexts, and that we can recommend for reducing sex worker vulnerability and limiting the risk of exploitation, are the following:

- Strengthen sex workers' labour rights, as well as introducing appropriate sector-specific laws (e.g., allowing those who no longer wish to do sex work to receive social welfare benefits without any 'quarantine' period).
- Promote workplace safety by creating non-exploitative work spaces. This includes setting up codes of conduct for sex premises, including codes that apply when hiring and contracting new workers, as their lack of experience may make them more vulnerable to being manipulated.
- Create safer environments for street-based sex work, including access to peer-based support and services, safe spaces, voluntary use of facilities where sex work can take place, and police patrols that are there to ensure the safety of sex workers.
- Introduce general safety tools such as disseminating information or tips about safety to, and between, sex workers, via social media or text-messages, and provide health services to sex workers who have experienced violence.
- Equip authorities to prevent exploitation and trafficking. This could include targeted training to increase a nuanced understanding of these crimes, initiatives such as the creation of 'police liaisons' that build trust with the sex work community, formal and informal information channels set up in order to warn and prevent crimes against sex workers.
- Enforce and strengthen demand-side measures such as laws that explicitly prohibit pressuring a sex worker to provide services, support for organisations that work with clients and information that provide clients with nuanced information about how to detect signs of exploitation and THB and how to act if violations are detected.
- Set up a 'firewall principle' between labour inspection, immigration control and law enforcement in order to protect migrant sex workers. That is, waving the obligation to report irregular migrants to immigration authorities.

RESEARCH PARAMETERS

The basis for the **comparative study** looking at Sweden, Germany and New Zealand, was a desk-based analysis of existing research on legislation, its implementation and its effects as documented in English and Swedish. The German partner in DemandAT contributed with information on Germany, based on publications in German. Furthermore, expert and stakeholder interviews were conducted in two cities in each country for the purpose of gaining additional insight about the three countries (to grasp aspects of the national debates and laws that would have escaped our attention if we would only have used written sources). Local actors provided their own observations and interpretations related to their contexts of practice. This local knowledge provided access to nuanced, contextual and site-specific aspects of policy. A combination of different approaches was chosen since it allows for an understanding of policy texts as well as how local policy-relevant actors interpret policies (Yanow 2000). In each country, we chose the capital city and another city with a relatively large population as interview locations, under the assumption that local conditions could generate different interpretations: in New Zealand, the capital city of

Wellington and the city of Auckland; in Germany, the capital Berlin and the city of Cologne, situated in different states with distinctively different implementation practices; and in Sweden the capital Stockholm and the city of Malmö, which distinguishes itself from Stockholm in that it is known for adopting 'unconventional' methods' emphasising harm reduction. Following Weitzer (2014), we chose an approach with few cases that has the value of allowing in-depth analysis, outlining major similarities and differences and identifying best practices. Interviews were of a semi-structured nature, focusing on general questions as well as questions relevant to each context. They were recorded and later transcribed. Interviews were conducted with representatives of NGOs focusing on topics like sex workers' rights, sexual health, trafficking in human beings or on political lobbying as well as with social workers, authorities and government officials, researchers and other interest groups.

In the **interview study** we interviewed 18 men (17 Swedish and one Norwegian; which we included since the Norwegian law criminalising the purchase of sex is similar to that of Sweden). Participants were recruited through an online advertisement placed on various online forums, including blogs and social media (WordPress, Twitter and Facebook) as well as websites where people who look to sell and buy sex communicate. Interviews were carried out using a mixed set of methods depending on the preferences of participants. Participants were given the option of answering a collection of open-ended questions via a face-to-face interview, telephone, chat or e-mail. The option of participating via e-mail was added upon request by participants. Those who preferred this option were sent the document that we used as a guide during all interviews and then filled in their answers and sent it back. The interview data consisted of 6 face-to-face interviews, 8 telephone interviews, 1 chat interview and 5 e-mail interviews. Out of the 5 participants who answered the questions via email, we followed up with face-to-face interviews with 2 of them. The questions we posed covered four areas: (1) questions about their age, gender, occupation, income etc.; (2) questions about their experiences of purchasing sex; (3) questions regarding the situation of the sex workers whom they had paid for sex and about selling sexual services in general; and (4) questions concerning law, policy and society. All interviews were conducted in Swedish.

Of the 18 subjects interviewed, 14 had purchased sex in Sweden, while 17 had purchased sex in countries other than their own. All participants defined themselves as 'male' and 'Swedish' (besides the Norwegian who described himself as 'male Norwegian'). All besides one defined themselves as 'heterosexual'. One described himself as 'bisexual'. One described his sexual orientation as 'largely heterosexual', another one described it as 'heterosexual with other experiences'. All shared the experience of having purchased sex from women, although some mentioned also having other experiences and preferences.

Participation in our study was based on self-selection, which implies some bias to our data. Those who participated did so out of interest to talk about the topics we were investigating. This means that our participants shared the predisposition to discuss and reflect about the matters we set out to study, at least to some extent. This kind of reflective attitude might not be true of all men who purchase sex. Thus, our findings should not be interpreted as generalisable for all clients, but they represent a segment of clients who reflect about ethical issues in a context where buying sex is illegal.

The typology was based on an inductive method, where empirical data provided the basis for the formulation of concepts. This is a research method similar to that which Bailey (1994) terms as an inductively formed 'indicator level classification'; this kind of classification begins with empirical clusters, which are then 'covered' by conceptual labels. Kluge (2000), who has explained the indicator level classification process, calls the end result of empirical analyses combined with theoretical knowledge 'empirically grounded types'. The three policy types were developed with the help of data collected in the DemandAT comparative prostitution policy study, the researchers' previous work on Swedish prostitution policy, ethnographically informed studies from several countries as well as available studies of sex work and policy analysis generally, including the emerging field of 'anthropology of policy' (Shore, Wright & Però 2011). In trying to develop this tripartite typology, we searched for patterns, similarities and differences that could form specific types. Simultaneously, we elaborated the main properties of the types and the suitable type labels, checked to make sure there was sufficient internal homogeneity within each type (i.e., that the

national cases within each type resembled each other) and sufficient heterogeneity (i.e., that there were unambiguous differences between the types). Moreover, we sought out what Kluge refers to as Weber's 'meaningful relationships', that is, not only empirical correlations between the properties within a type, but a relationship between the different types that makes sense. According to Kluge (2000), it is these relationships that form the basis of empirically grounded types, so that we not only describe, but also understand and explain these relationships. In the last stage, we described the types extensively, just as Kluge (2000) recommends, by means of the combination of attributes and meaningful relationships, and finally, we characterised the types as 'ideal types'. Most importantly, we tried to delimit potential grey zones and ambiguities and then refine the classifications without losing the nuance or characteristics of each specific policy type.

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