



Global Alliance Against Traffic in Women

CRIMINALISING CLIENTS ENDANGERS SEX WORKERS AND CREATES BARRIERS TO EXITING SEX WORK: LESSONS LEARNED FROM THE ANTI-TRAFFICKING INDUSTRY

Brief to the Senate Legal and Constitutional Affairs Committee
on Bill C-36: Protection of Communities and Exploited Persons Act

Submitted 8 September 2014

by the Global Alliance Against Traffic in Women, International Secretariat (GAATW-IS)
and Global Alliance Against Traffic in Women - Canada (GAATW-Canada)

Authored by Ms Julie Ham, Associate, Global Alliance Against Traffic in Women, International Secretariat (GAATW-IS)

Criminalising clients endangers sex workers

The Global Alliance Against Traffic in Women, International Secretariat (GAATW-IS) strongly opposes introducing criminal penalties against the clients of sex workers. This conclusion is based on our 20 years of working with and learning from sex workers and specifically, our 2011 research of client criminalisation or 'end demand for prostitution' approaches, *Moving Beyond 'Supply and Demand' Catchphrases: Assessing the uses and limitations of demand-based approaches in anti-trafficking*.¹ We found that criminalising sex workers' clients does not reduce sex work or trafficking. Instead, it infringes on sex workers' rights and obstructs anti-trafficking efforts.

In summary, GAATW strongly opposes criminal penalties against sex workers' clients as this approach:

- Has not reduced trafficking;
- Threatens sex workers' income security and working conditions, by increasing competition amongst sex workers, and decreasing opportunities for safe screening procedures;
- Has not stopped violent or abusive clients who are more experienced at evading law enforcement, but has ended up impacting less experienced clients;
- Dismisses and silences the concerns, priorities and knowledge of sex workers;
- Increases law enforcement power over sex workers; and
- Increases stigma against sex workers.

Criminalising clients threatens sex workers' income security and working conditions

Criminalising clients may end up necessitating risky work practices and increasing the risk of violence. Less 'demand' or less business can put sex workers in situations where they feel pressured to take on more dangerous clients, work longer hours, lower their rates, or engage in unsafe work practices. Sex workers may feel the need to work alone and/or work in more isolated locations, in order to avoid detection by law enforcement.²

The Global Alliance Against Traffic in Women

191/41 Sivalai Condominium, Soi 33, Itsaraphap Rd, Bangkok-yai, Bangkok 10600, Thailand

Tel. 66-2-864-1427/8 Fax. 66-2-864-1637

E-mail: gaatw@gaatw.org Website: www.gaatw.org

Criminalising clients increases law enforcement power over sex workers

Globally, sex workers rights groups have identified police brutality and police harassment as one of the greatest threats of violence against sex workers.³ Even if only one party is criminalised, transactions still have the potential for police harassment and exploitation. Increasing criminal penalties against sex workers' clients reinforces law enforcement power over sex workers⁴ and (1) entrenches the traditional mistrust between sex workers and law enforcement; (2) does nothing to address abuse and exploitation by law enforcement (e.g. confiscating sex workers' earnings); and (3) reduces the likelihood that sex workers will inform law enforcement if they need assistance or if they experience violence.⁵

Criminalising clients increases stigma against sex workers

The stigma around sex work can make it harder for individuals to exit sex work and/or access health services and labour rights protections. In Sweden, there is general consensus that the *Sex Purchase Act* has endangered sex workers' health and well-being.⁶ Incredibly, the government's 2010 official evaluation argued that the increased stigmatisation and risks faced by sex workers was a positive result of the Sex Purchase Act; in other words, endangering sex workers helps 'fight' prostitution.

Criminalising clients may target certain groups of clients more than others

Some have expressed strong concerns that the criminalisation of clients would result in law enforcement targeting men already under increased police surveillance, such as men in working-class, immigrant, and visible minority communities or clients of street-based sex workers.⁷ Movements against the growing prison-industrial sector have also articulated reasons against using incarceration and criminalisation as the primary solution for social and economic issues. Research has found that 'John schools'⁸ or educational programs to 'rehabilitate' male clients may change attitudes but not behaviour, and have not shown to be a cost-effective strategy for reducing sex work.⁹

*Of course, it would be possible to extend the logic of the "penalise the buyer" approach to all forms of sex commerce: a total ban on all forms of sexualised entertainment and pornography involving actors/models; raids on private homes and monitoring of private bank accounts to ensure that people are not using the internet to access sex workers; phone taps to ensure that telephone sex is not being consumed. But most would balk at the civil liberties implications of such an approach.*¹⁰– Dr. Julia O'Connell Davidson

*The purchase of sexual services is a typical surveillance crime. If resources are allocated, more crimes can be detected and penalized. According to police officers interviewed in the evaluation, the number of reported could be "multiplied if this crime was a priority in everyday operations". With this reasoning, one can get the kind of criminality one desires. The police activity itself produces more and more crimes, which in turn can justify why more resources are needed to combat sex purchase via policing.*¹¹– Department of Criminology, Stockholm University

Using criminalisation and incarceration to address a moral opposition to prostitution can have serious long-term effects on people's access to employment options and social inclusion.¹² Approaches that call for criminalising clients and other 'exploiters' can also end up criminalising individuals in the sex industry who are not sex workers, e.g. maids, receptionists, business owners.

Criminalising clients may not be effective in capturing abusive clients

'End demand for prostitution' approaches that seek to punish all clients is an ineffective strategy of reducing violence against sex workers, as sex workers still stress that they are unable to get their concerns taken seriously by law enforcement and other authorities. Sex workers rights groups and their allies have strongly advocated for addressing violence against sex workers (mainly police violence, but also including violent clients). The 'end demand for prostitution' or client criminalisation approaches, however, argue that no distinction should be made between what sex workers define as exploitative or abusive behaviour, and what sex workers define as a consensual, commercial transaction.

Prostitution-abolitionist ideas can normalise violence against sex workers

It is possible that prostitution-abolitionist perspectives can lead to the harms they are ostensibly against. Clients with similar attitudes as abolitionists (e.g. sex workers are commodities, it is impossible to 'rape' a prostitute) may be more likely to be violent or abusive than clients that subscribe to a sex workers' rights perspective (e.g. sexual services should be negotiated between a worker and client, sex workers have the right to work safely). A 2003 study found that men who saw prostitution as just another sector of work were more likely to be concerned about women trafficked into prostitution. Clients who were most likely to use the services of trafficked persons shared abolitionist ideas that sex workers were commodities and that payment signified ownership, not exchange.¹³

Barriers to exiting sex work: Lessons learned from the anti-trafficking industry

The federal government's proposal to allocate 20 million dollars (CDN) towards funding exit programs for sex workers appears to be a progressive exception within the criminalisation framework proposed in Bill C-36, but we are strongly concerned that this may be used to fund repressive approaches to exiting sex work. Our concerns are based on the dismissal of diverse sex worker perspectives in previous hearings and consultations by the federal government, and the contradictions between Bill C-36 and the *Bedford v. Canada* decision by the Supreme Court of Canada.

We are concerned that Bill C-36 may encourage a repressive approach to exiting sex work, including programs that force or coerce individuals out of the sex work sector against their will. We note that the following has not been stated by the federal government. However, we offer the following 'lessons learned' based on our extensive experience challenging repressive anti-trafficking measures and urge the Canadian federal government not to create a context in which the following could occur.¹⁴

The problem of conditionality: In our 2007 report, *Collateral Damage*¹⁵, we challenged the common state practice of conditionality or offering support to victims of trafficking upon the condition that they assist law enforcement officials in the prosecution of suspected traffickers. Such conditionality is illegal under the international law on trafficking in persons.¹⁶ GAATW argued that the needs of law enforcement officials should not outweigh the needs of victims of trafficking. We are concerned that supports for exiting the sex work sector may follow a similar trend. Given the demonisation and misrepresentation of sex workers' clients implicit in Bill C-36, we are concerned that sex workers may be coerced to assist law enforcement officials in the prosecution of clients in order to be eligible for supports and services.

Manufacturing crises to deliver crisis intervention: The termination of the Operation Help program in Saskatoon demonstrates the dangers of exiting, ‘rescue’ or ‘rehabilitation’ programs that rely on coercion and traumatisation. In a *CBC News* article, an Operation Hope worker argues that sex workers are more receptive to ‘rescue’ when they are in crisis; in this instance a crisis triggered by arrest.¹⁷ The use of traumatising law enforcement measures to essentially promote crisis intervention programs is highly unethical. Sex worker organisations have developed ethical and responsive models for exiting, yet we are concerned that the criminalisation of clients fosters a climate that tacitly supports the use of force or coercion by social service providers.¹⁸ The choice to exit sex work should not be made under the threat of legal consequences or bodily harm.

Prioritising law enforcement as funding recipients: It is not stated who will be prioritised for funding. However, we are concerned that this funding may exclude sex worker support organisations who do not subscribe to the federal government’s view of criminalising clients. By definition, an approach that espouses the criminalisation of clients authorises law enforcement to govern sexual activity between consenting adults. In this context, there is a concern that any increases in funding will prioritise law enforcement bodies over community programs. This trend has been noted by SWAN Vancouver¹⁹, a Canadian GAATW Member Organisation. In a recent article for the *Anti-Trafficking Review* journal²⁰, SWAN notes that a 2012 funding call by the Status of Women Canada, supports the connection between the criminalisation of clients, or ‘demand’, and the expansion of law enforcement power.²¹ We are concerned that legislation criminalising clients will prioritise law enforcement interventions instead of community-based solutions, particularly given that sex workers continue to associate law enforcement with punishment rather than protection.

Decriminalise sex work

GAATW supports the removal of criminal penalties around consensual adult sex work. Decriminalisation would reflect the *Bedford v. Canada* decision by the Supreme Court of Canada. UN representatives and researchers have advocated the decriminalisation of sex work, as a strategy to reduce violence²², increase public health²³, reduce HIV²⁴, prevent corruption²⁵, protect sex workers’ rights²⁶, facilitate anti-trafficking efforts²⁷, reduce police abuse²⁸ and reduce migrant sex workers’ risk of abuse and deportation.²⁹ New Zealand’s Prostitution Reform Act (2003) remains the most significant example of a decriminalised approach to sex work and has been effective in reducing police corruption, strengthening sex workers’ rights and strengthening safe sex practices.³⁰

With regard to adult sex work that involves no victimization, criminal law should be reviewed with the aim of decriminalizing, then legally regulating occupational health and safety conditions to protect sex workers and their clients, including support for safe sex during sex work. – 21(c), Guideline 4, Office of the UN High Commissioner for Human Rights and the Joint UN Programme on HIV/AIDS.³¹

Decriminalisation, along with the institution of appropriate occupational health and safety regulations, safeguards the rights of sex workers. – Anand Grover, UN Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.³²

About the Global Alliance Against Traffic in Women – International Secretariat

GAATW has always supported sex workers' rights and valued the crucial role sex workers have in the anti-trafficking movement. From the start of the Alliance, GAATW has demanded a respectful voice for sex workers in global anti-trafficking discourses, criticised law and policy that did not differentiate between sex work and trafficking in persons, and documented the harm to sex workers (and others) of anti-trafficking measures.

The Global Alliance Against Traffic in Women (GAATW) is an Alliance of more than 120 non-governmental organisations from Africa, Asia, Europe, North America, Latin America and the Caribbean. The GAATW International Secretariat is based in Bangkok, Thailand, and coordinates the activities of the Alliance, collects and publicises information, and advocates on behalf of the Alliance at regional and international levels. Member Organisations include migrant rights organisations; anti-trafficking organisations; self-organised groups of migrant workers, domestic workers, survivors of trafficking and sex workers; human rights and women's rights organisations; and direct service providers.

¹ Full report available here:

http://www.gaatw.org/publications/MovingBeyond_SupplyandDemand_GAATW2011.pdf

² E.g. New Zealand Government. (2008). *Report of the Prostitution Law Review Committee on the Operation of the Prostitution Reform Act 2003*. Wellington: Ministry of Justice. Available online at:

<http://www.justice.govt.nz/policy/commercial-property-and-regulatory/prostitution/prostitution-law-review-committee/publications/plrc-report/documents/report.pdf>

Östergren, P. (n.d.). *Sex workers Critique of Swedish Prostitution Policy*. Available online at:

http://www.petraostergren.com/pages.aspx?r_id=40716

World AIDS Campaign. (2010). *Sex Work and the Law: The Case for Decriminalisation*. Available online at:

<http://www.desirealliance.org/conference/Sex%20Work%20and%20the%20Law%20-%20case%20for%20decrim-2.pdf>

Urban Justice Center Working Group on Sex Work and Human Rights. (n.d.). The truth about demand. *Media Toolkit*.

Available online at: <http://sexworkersproject.org/media-toolkit/>

Dodillet, S. & Östergren, P. (2011, March 3-4). *The Swedish Sex Purchase Act: Claimed Success and Documented Effects*.

Conference paper presented at *Decriminalizing Prostitution and Beyond: Practical Experiences and Challenges*, The Hague, Netherlands. Available online at: <http://gup.ub.gu.se/records/fulltext/140671.pdf>

³ E.g. GAATW. (2009, August 31-September 4). *Asia Regional Consultation: Consultation Report*. Bangkok:

GAATW. Available online at: <http://www.gaatw.org/resources/conference-reports/613-gaatw-asia-regional-consultation-arc-report>

Ditmore, M. (ed.). (2005). Sex work and law enforcement. *Research for Sex Work, 8*. Available online at:

<http://www.nswp.org/sites/nswp.org/files/research-for-sex-work-8-english.pdf>

van Beelen, N. & Rakhmetova, A. (2010). Sex work and violence. *Research for Sex Work, 12*. Available online at:

<http://www.nswp.org/resource/research-sex-work-12-sex-work-and-violence-englishrussian>

Östergren, P. (n.d.). *Sex workers Critique of Swedish Prostitution Policy*. Available online at:

http://www.petraostergren.com/pages.aspx?r_id=40716

⁴ Urban Justice Center Working Group on Sex Work and Human Rights. (n.d.). The truth about demand. *Media Toolkit*.

Available online at: <http://sexworkersproject.org/media-toolkit/>

⁵ English Collective of Prostitutes. (2004, December 4). *Criminalisation: The Price Women & Children Pay - A Response to the Government's Review of the Prostitution Laws*. Presented at the conference *No Bad Women, No Bad Children, Just Bad Laws*, London (UK). Available online at:

<http://myweb.dal.ca/mgoodyea/Documents/UK/Criminalisation%20-%20The%20Price%20Women%20and%20Children%20Pay%20ECP%202004.pdf>

Mai, N. (2010). *Migrant Workers in the UK Sex Industry: Final Policy-Relevant Report*. Available online at:

<https://metranet.londonmet.ac.uk/fms/MRSite/Research/iset/Migrant%20Workers%20in%20the%20UK%20Sex%20Industry%20Policy-Relevant%20Findings2.pdf>

International Union of Sex Workers (IUSW). (2009). *The Way Forward: A Call for Action to End Violence Against Women in the Sex Industry*. Available online at:

<http://myweb.dal.ca/mgoodyea/Documents/Health%20and%20wellbeing/IUSWLondonVAWresponse.pdf>

- ⁶ Dodillet, S. & Östergren, P. (2011, March 3-4). *The Swedish Sex Purchase Act: Claimed Success and Documented Effects*. Conference paper presented at *Decriminalizing Prostitution and Beyond: Practical Experiences and Challenges*, The Hague, Netherlands. Available online at: <http://gup.ub.gu.se/records/fulltext/140671.pdf>
- ⁷ Wilcox, A., Christmann, K., Rogerson, M. & Birch, P. (2009). *Tackling the Demand for Prostitution: A Rapid Evidence Assessment of the published research literature. Project Report*. Home Office. Available online at: <http://webarchive.nationalarchives.gov.uk/20100113210150/http://homeoffice.gov.uk/rds/pdfs09/horr27c.pdf>
- Walker, S. (1999). The John School: A diversion from what's needed. In N. Lopez (Ed.), *Some Mother's Daughter: The Hidden Movement of Prostitute Women Against Violence* (165-168). London: Crossroads Books.
- ⁸ 'John schools' are educational programs offered by law enforcement to men charged with prostitution-related offences. The first John School, the *First Offender Prostitution Program (FOPP)* was implemented in San Francisco (US) in 1995. For more information, see Walker, S. (1999). The John School: A diversion from what's needed. In N. Lopez (Ed.), *Some Mother's Daughter: The Hidden Movement of Prostitute Women Against Violence* (165-168). London: Crossroads Books.
- ⁹ Wilcox, A., Christmann, K., Rogerson, M. & Birch, P. (2009). *Tackling the Demand for Prostitution: A Rapid Evidence Assessment of the published research literature. Project Report*. Home Office. Available online at: <http://webarchive.nationalarchives.gov.uk/20100113210150/http://homeoffice.gov.uk/rds/pdfs09/horr27c.pdf>
- Initiatives to "end demand" for prostitution harm women and undermine good programs*. Best Practices Policy Project. Available online at <http://www.desireealliance.org/resources/endeddemand.htm>
- ¹⁰ O'Connell Davidson, J. (2006, July 27). Men, middlemen, and migrants: The demand side of "sex trafficking". *Eurozine*. Available online at: <http://www.eurozine.com/articles/2006-07-27-davidson-en.html>
- ¹¹ Dodillet, S. & Östergren, P. (2011, March 3-4). *The Swedish Sex Purchase Act: Claimed Success and Documented Effects*. Conference paper presented at *Decriminalizing Prostitution and Beyond: Practical Experiences and Challenges*, The Hague, Netherlands. Available online at: <http://gup.ub.gu.se/records/fulltext/140671.pdf>
- ¹² English Collective of Prostitutes. (2004, December 4). *Criminalisation: The Price Women & Children Pay - A Response to the Government's Review of the Prostitution Laws*. Presented at the conference *No Bad Women, No Bad Children, Just Bad Laws, London (UK)*. Available online at: <http://myweb.dal.ca/mgoodyea/Documents/UK/Criminalisation%20-%20The%20Price%20Women%20and%20Children%20Pay%20ECP%202004.pdf>
- Walker, S. (1999). The John School: A diversion from what's needed. In N. Lopez (Ed.), *Some Mother's Daughter: The Hidden Movement of Prostitute Women Against Violence* (165-168). London: Crossroads Books.
- ¹³ O'Connell Davidson, J. (2003). 'Sleeping with the enemy'? Some problems with feminist abolitionist calls to penalise those who buy commercial sex. Available online at http://www.researchgate.net/publication/231932152_Sleeping_with_the_enemy_Some_Problems_with_Feminist_Abolitionist_Calls_to_Penalise_those_who_Buy_Commercial_Sex
- ¹⁴ For example, see GAATW's 2007 report *Collateral Damage: The Impact of Anti-Trafficking Measures on Human Rights around the World*. Available online at: http://www.gaatw.org/Collateral%20Damage_Final/singlefile_CollateralDamagefinal.pdf
- ¹⁵ Pg. 21-22, http://www.gaatw.org/Collateral%20Damage_Final/singlefile_CollateralDamagefinal.pdf
- ¹⁶ The Legislative Guide to the Protocol states that "support and protection shall...not be made conditional upon the willingness to cooperate in legal proceedings" (par.62), <https://www.unodc.org/unodc/en/treaties/CTOC/legislative-guide.html#traffickig>
- ¹⁷ This is also recommended in the report of the United Nations High Commissioner for Human Rights on the *Recommended Principles and Guidelines on Human Rights and Human Trafficking* (E/2002/68/Add.1).
- ¹⁸ Saskatoon prostitute rescue program on hold. *CBC News*, 24 March 2014 Available online at: <http://www.cbc.ca/news/canada/saskatchewan/saskatoon-prostitute-rescue-program-on-hold-1.2581968>
- ¹⁹ E.g. PEERS Victoria (<http://www.safensexwork.ca/>) and the now closed PEERS Vancouver (<http://peersvancouver.wix.com/3>)
- ²⁰ Or Supporting Women's Alternatives Network. More information can be found at swanvancouver.ca
- ²¹ Clancey, A., Khushrushahi, N. & Ham, J. (2014, forthcoming). Do evidence-based approaches alienate Canadian anti-trafficking funders. *Anti-Trafficking Review*, 3.
- ²² *Status of Women Canada, Local Safety Audit Guide: To prevent trafficking in persons and related exploitation, Public Safety Canada*. Available online at: <http://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/lcl-sfty-dtgd/index-eng.aspx>
- ²³ E.g. Rekart, M. L. (2005). Sex-work harm reduction. *The Lancet*, 366(9503), 2123-2134. Open Society Foundations. (n.d.(b)). *10 Reasons to Decriminalise Sex Work: A Reference Brief*. New York: Open Society Foundations. Available online at: <http://www.opensocietyfoundations.org/sites/default/files/decriminalize-sex-work-20120713.pdf>
- Report of the Special Rapporteur on extreme poverty and human rights, Ms. Magdalena Sepúlveda Carmona, to the UN Human Rights Council, Twenty-third session, Addendum: Mission to Namibia (1 to 8 October 2012)*, UN Doc. A/HRC/23/36/Add.1, 17 May 2013, Section E (paras.50-53 and associated recommendations)

- Report of the Special Rapporteur on violence against women, its causes and consequences, Rashida Manjoo, to the UN Human Rights Council, Twenty-sixth session, Addendum: Mission to India, UN Doc. A/HRC/26/38/Add.1, 1 April 2014, paras.20-21, recommendation at para.78(e)*
- ²³ E.g. Office of the United Nations High Commissioner for Human Rights and the Joint United Nations Programme on HIV/AIDS. (2006). *International Guidelines on HIV/AIDS and Human Rights: 2006 Consolidated Version*. Available online at: <http://www.ohchr.org/Documents/Publications/HIVAIDSGuidelinesen.pdf>
- Grover, A. (2010). *Report of the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental*. Presented at Human Rights Council, Fourteenth session, 27 April 2010. Available online at: <http://www2.ohchr.org/english/bodies/hrcouncil/docs/14session/A.HRC.14.20.pdf>
- ²⁴ E.g. Beyrer, C., Crago, A-L., Bekker, L-G., Butler, J., Shannon, K., Kerrigan, D., Decker, M.R., Baral, S.D., Poteat, T., Wirtz, A.L., Weir, B.W., Barré-Sinoussi, F., Kazatchkine, M., Sidibé, M., Dehne, K-L, Boily, M-C. & Strathdee, S.A. (2014). An action agenda for HIV and sex workers. *The Lancet*, Early Online Publication, 22 July 2014, doi:10.1016/S0140-6736(14)60933-8
- Das, P. & Horton, R. (2014). Bringing sex workers to the centre of the HIV response. *The Lancet*, Early Online Publication, 22 July 2014, doi:10.1016/S0140-6736(14)61064-3
- Shannon, K., Strathdee, S.A., Goldenberg, S.M., Duff, P., Mwangi, P., Rusakova, M., Reza-Paul, S., Lau, J., Deering, K., Pickles, M.R. & Boily, M.-C. (2014). Global epidemiology of HIV among female sex workers: influence of structural determinants. *The Lancet*, Early Online Publication, 22 July 2014, doi:10.1016/S0140-6736(14)60931-4
- ²⁵ E.g. Harcourt, C., Egger, S., & Donovan, B. (2005). Sex work and the law. *Sexual Health*, 2(3), 121-128.
- ²⁶ Weitzer, R. (2009). Legalising prostitution: Morality politics in Western Australia. *British Journal of Criminology*, 49(1), 88-105.
- ²⁷ E.g. Open Society Foundations. (n.d.(b)). *10 Reasons to Decriminalise Sex Work: A Reference Brief*. New York: Open Society Foundations. Available online at: <http://www.opensocietyfoundations.org/sites/default/files/decriminalize-sex-work-20120713.pdf>
- Ham, J. (2011). *Moving Beyond 'Supply and Demand' Catchphrases: Assessing the Uses and Limitations of Demand-based Approaches in Anti-Trafficking*. Bangkok, Thailand: Global Alliance Against Traffic in Women (GAATW). Available online at: http://www.gaaww.org/publications/MovingBeyond_SupplyandDemand_GAATW2011.pdf
- ²⁸ E.g. Decker, M.R., Crago, A-L., Chu, S.K.H., Sherman, S.G., Seshu, M.S., Buthelezi, K., Dhaliwal, M. & Beyrer, C. (2014). Human rights violations against sex workers: burden and effect on HIV. *The Lancet*, Early Online Publication, 22 July 2014, doi:10.1016/S0140-6736(14)60800-X
- Kerrigan, D., Kennedy, C.E., Morgan-Thomas, R., Reza-Paul, S., Mwangi, P., Win, K.T., McFall, A., Fonner, V.A. & Butler, J. (2014). A community empowerment approach to the HIV response among sex workers: effectiveness, challenges, and considerations for implementation and scale-up. *The Lancet*, Early Online Publication, 22 July 2014, doi:10.1016/S0140-6736(14)60973-9
- ²⁹ E.g. Brock, D., Gillies, K., Oliver, C., & Sutdhibhasilp, M. (2000). Migrant sex work: A roundtable analysis. *Canadian Women Studies*, 20(2), 84-91.
- ³⁰ New Zealand Government. (2008). *Report of the Prostitution Law Review Committee on the Operation of the Prostitution Reform Act 2003*. Wellington: Ministry of Justice.
- ³¹ Office of the United Nations High Commissioner for Human Rights and the Joint United Nations Programme on HIV/AIDS. (2006). *International Guidelines on HIV/AIDS and Human Rights: 2006 Consolidated Version*. Available online at: <http://www.ohchr.org/Documents/Publications/HIVAIDSGuidelinesen.pdf>
- ³² Grover, A. (2010). *Report of the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental*. Presented at Human Rights Council, Fourteenth session, 27 April 2010. Available online at: <http://www2.ohchr.org/english/bodies/hrcouncil/docs/14session/A.HRC.14.20.pdf>