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Business doing pleasure?

A comparative interview study of experiences of vulnerability and strategies of resistance amongst sexworkers in Sweden and the Netherlands

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Abstract

Sexwork is a complex phenomenon. There are different forms of legislation surrounding the issue, ranging from complete decriminalization/legalization to complete criminalization. In this thesis, the cases of Sweden and the Netherlands are compared. Utilizing critical phenomenology and an intersectionality framework, interviews with sexworkers in Sweden and the Netherlands were conducted and analyzed. The aim was to understand how the interviewees experienced vulnerability in their work as sexworkers, and to gain insight into the ways in which they coped with and resisted these vulnerabilities. The main findings were that the interviewees all experienced similar forms of vulnerability, related to experiencing a lack of agency in their work and life, stigmatization and abjection. The degree to which these vulnerabilities were experienced differed somewhat between the interviewees in Sweden and the Netherlands, but were largely consistent between the cases. It was also found that the interviewees in both countries utilized similar forms of resistance against the challenges they faced, though larger-scale political resistance was more accessible for the interviewees in the Netherlands. Lastly, it was found that sexworkers with intersecting marginalized identities experienced layered forms of vulnerability in their work, and that they overall had less access to community and resistance strategies.

Key words: sexwork, vulnerability, resistance, intersectionality, interviews
Word count: 19983

1. Introduction

On September 14th of 2023, the European parliament passed a resolution "against prostitution" by adopting a non-binding report: *Regulation of Prostitution in the EU: Its Cross-Border Implications and Impact on Gender Equality and Women's Rights.* The motion originally included references to the so-called Nordic model and a call for a EU-wide policy based on this model, but these parts were omitted in the final resolution. As a result, the responsibility for policies on prostitution will remain with the individual member states, at least for the time being (Ellena 2023).

Europe is divided when it comes to the topic of prostitution, or as it is often termed, sexwork. Sweden, among some of its Nordic neighbors, has adopted the Nordic model, in which the client is criminalized, while other European countries have policies ranging from complete criminalization to complete decriminalization. Apart from the member states, there is a multitude of organizations and unions advocating for the rights, health and safety of sexworkers all over Europe (Zandt & Richter 2021). Both the public and the media seem similarly divided on the topic, arguing on the one hand that prostitution and sexwork are social ills that need to be eradicated from society, and on the other hand that they are inevitable parts of modern society not necessarily associated with violence and oppression (Dodillet, 2009, s. 26).

The debate in the European parliament was in some ways unique, as it invited sexworkers and prostitutes to speak about their experiences in the sex industry and to share their insights as to what they believe be the best way forward (Ellena 2023). These voices are seldom heard in policy circles, and are only rarely consulted in policymaking. As such, through including these voices in the debate, the parliament is signaling that the stories and experiences of sexworkers and prostitutes *matter* in a very real way. In light of this, I chose to conduct an interview study with sexworkers in Sweden and the Netherlands about their experiences of sexwork, the vulnerabilities they face in their work, and the ways in which they cope with or resist these vulnerabilities. I believe that a greater understanding of these factors is crucial

if we are to create better and more inclusive policy about sexwork for all sexworkers, in Europe and beyond, and that we can only gain this understanding from speaking to sexworkers themselves.

For this thesis, sexworkers from Sweden and the Netherlands have been interviewed. All interviewees identify as sexworkers, and are part of sexworker-led organizations that view sexwork as legitimate work. As such, these are the sexworkers that are implicated in this thesis, and the scope of the research is thus limited to these individuals.

1.1 Purpose

The purpose of this study is to contribute to a greater understanding of the vulnerabilities that sexworkers in Sweden and the Netherlands face and the strategies they use to resist or cope with these vulnerabilities. Focus will also be on how the sexworkers' identities, beliefs and backgrounds affect their experiences as sexworkers, their vulnerabilities and strategies of resistance. This aim is closely related to the chosen methodology for this thesis. The intricacies of this methodology is elaborated further on, but for now it is sufficient to say that it posits that it is not possible to understand a phenomenon without engaging with the lived experience of those who have experienced said phenomenon (Al-Saji 2017, pp. 146; 149). As such, if we want to understand the experiences of sexworkers in Sweden and the Netherlands, we have to ask the sexworkers themselves about it.

The broader aim of this research project is further connected to both the theoretical framework and to the comparative aspect. This study uses intersectionality theory as the theoretical framework. Intersectionality theory is normative, and has the explicit aim of sociopolitical transformation (MacKinnon 2013, pp. 1023-1024; Fahs & McClelland 2016). Taking a quick glance at Sweden and the Netherlands, it becomes clear that in neither country are sexworkers supported and protected by the existing social and legal frameworks (though in both cases this is said to be the aim)

(Östergren & Dodillet 2011.; Vanwesenbeeck 2011). In order to create policy around sexwork that succeeds in its stated aims, we need to come to a better understanding of the lived realities of sexworkers, what problems and opportunities they face, what makes them vulnerable and resilient, and what they need to feel protected, supported and respected. It is a key aim of this thesis to contribute to such understanding.

As such, the research question is: How can we understand the vulnerabilities faced by sexworkers in Sweden and the Netherlands, as well as the strategies of resistance used to navigate these challenges?

1.1.1 Relevance for political science

This research project is relevant from a political science perspective, not only because it involves an examination of a phenomenon that is seemingly always politically and socially relevant. Prostitution, or sexwork as it will be referred to hereafter, is often termed "the worlds oldest profession", and has proven to be a remarkably constant feature of past and present societies all over the world. It is politically controversial and yet continuously debated in feminist circles and beyond. This thesis thus attempts to contribute to the understanding of this complex phenomenon through asking sexworkers themselves about their experiences with it.

This thesis also speaks to the fact that research can have impacts that are fundamentally both personal and political. Absent from most debates on sexwork is a purposeful analysis of the many ways in which these are issues that depend not only on women's rights and patriarchal structures, but also on the multitude of intersections of race, class, sexuality and other marginalized identities of those in sexwork (Pocock 2015, p. 1). This thesis aims to begin to amend this, and to contribute to a more nuanced understanding of the experiences of sexworkers in Sweden and the Netherlands in relation to their diverse identities, backgrounds and circumstances. It is arguably relevant to the discipline of political science to seek to understand what makes a marginalized group vulnerable, how legal frameworks affect different individuals and groups differently based on their age, race, gender,

background and sexuality, and to understand the various ways in which these groups resist and cope, in order to create better laws, policies and to provide care and support for those that need it.

In this thesis, vulnerability will be conceptualized along the lines of Brown (2021, p. 210) as "the probability of experiencing a loss (...) relative to some benchmark of welfare". As elaborated below, this probability is inescapably affected by a range of factors related to the identities of individuals and groups, such as race, gender, age, ability and sexuality. Similarly, resistance will be defined as strategies or practices that are used to resist, co-opt, disrupt or challenge negative stereotypes, representations or measures of control.

1.2 Background

Lena Edlund and Evelyn Korn have argued that, throughout history, "while attitudes toward prostitution have vacillated between condemnation and laissez-faire, the prostitute herself has suffered a consistently poor reputation" (2002, pp. 207-208). For centuries, cultural, social and legal practices have served the purpose of identifying and displacing prostitutes and sexworkers to keep them a safe distance from "respectable" society. Echoing Foucault, the existence of commercial sexuality has nearly always been associated with a condemnation of "improper" sex acts (Rodríguez García, van Nederveen Meerkerk & van Voss 2017, p. 12).

Though prostitution and sexwork has often been termed "the world's oldest profession", commercial sex did not become entirely commodified until the rise of industrial society, the nation state and the beginning stages of globalization (ibid.). Especially for women, using sex for purposes other than procreation was (and still is) more or less openly criminalized. In all patriarchal societies, female promiscuity has been rebuked as it not only threatens the ability of men to establish paternity, but also the ability of women to secure good partners. Further, female promiscuity as a means to securing material gains threatens the traditional roles of women as caregivers and

men as family heads and breadwinners. As such, prostitution and sexwork threaten the very premise of the patriarchal, nuclear family (ibid.).

In the nineteenth century and onward, the increased commercialization of sex in modern capitalist societies seems to have been followed by increased moral condemnation, both due to its associations with degeneracy and disruptive behavior, but also due to it being understood as degrading for those doing it. In the second half of the nineteenth century, those involved in prostitution were increasingly presented and perceived as victims in countries where feminist movements had gained ground. This was the beginning of the connections between prostitution, migration, male violence, economic oppression and (sexual) trafficking that are still being discussed to this day (Rodríguez García, van Nederveen Meerkerk and van Voss 2017, p. 12-13). By the late 1800s, a movement for the end of the "white slave traffic" emerged in Britain and eventually spread internationally. Since then, there have been several both national and international initiatives to combat trafficking (especially for sexual purposes), and the view of prostitution and sexwork as harmful social ills have become increasingly influential (ibid.).

1.2.1 Sweden

Sweden was the first country in the world to criminalize the purchase of sexual services, but not the sale of them (Jämställdhetsmyndigheten 2023). The law, in Swedish known as *Sexköpslagen* ("the sex purchase law"), was introduced in 1998 in the wake of the proposition "kvinnofrid" (literally "women's refuge") (SOU 2010:49, pp. 14). Within this proposition, it was emphasized that prostitution was a social harm with dire consequences for both individuals and society at large. It was further presumed that criminalization of the purchase of sexual services would have a deterrent effect on buyers. Another argument for the law was that it would have a deterrent effect on foreign actors looking to establish prostitution organizations in Sweden (prop. 1997/98:55). The proposition also established prostitution as a part of men's violence against women, and so it became tied to the question of how to achieve wider gender equality in Swedish society. The measures against prostitution

are thus part of the national strategy against men's violence against women (skr. 2016/17:10) and are also influenced by the government's plan of action against sex trafficking (ibid.). A related law that is often used in conjunction with *sexköpslagen* is the pandering law, or *kopplerilagen* in Swedish. This law makes it illegal to "encourage" or economically benefit from another person's exchange of sexual services for compensation (SFS 1962:700, ch. 6). It is also illegal to lease a residence, knowing it is or will be used for the purposes of pimping[1] or selling sexual services (ibid.).

Importantly, due to the fact that the sale of sexual services is not illegal, the person selling the sexual service is not awarded the status of plaintiff in case of a trial. Instead, the seller is most often given the role of witness (BRÅ 2022 103; 105-107).

The law was amended in 2011 to increase the potential penalty for the crime to incarceration for up to a year, though most commonly the conviction leads to a fine (*dagsböter* in Swedish) (BRÅ 2022, p. 19). The definition for the crime can be found in chapter 6, paragraph 11 of the Swedish criminal code (*brottsbalken*) and runs as follows: "One who acquires a temporary sexual connection through compensation will be convicted of purchase of sexual service and receive the penalty of a fine or imprisonment for up to one year" (SFS 1962:700, ch. 6 § 11) [own translation]. This applies even if the compensation has been promised or provided by another party. "Temporary sexual connection" refers to the procurement of a sexual service such as intercourse or other types of sexual service (prop. 1997/98:55). The term "compensation" refers not only to money and financial means, but may also refer to e.g. alcohol or narcotics (ibid.).

Apart from the state measures against prostitution and sexwork, there are several organizations in Sweden offering different kinds of support and help for persons selling sex. Most of this work is oriented towards helping people *get out of*

[1] The action or practice of controlling prostitutes and arranging clients for them, taking part of their earnings in return

prostitution and sexwork, offering protection from pimps and support in finding other means of income (Jämställdhetsmyndigheten, n.d). These organizations can be either state-sponsored or independent (Talita, n.d., Inte Din Hora, n.d.). Some organizations, such as Red Umbrella, are not aimed at getting people out of prostitution and sexwork, but rather at strengthening the rights and political influence of active and former sexworkers (Red Umbrella Sweden, n.d.). These organizations tend to not view sexwork and prostitution as violence, and offer support to those that have no intention to get out of it (ibid.).

1.2.2 The Netherlands

The history of Dutch policy towards prostitution and sexwork can best be summarized through the notion of pragmatic tolerance. Though brothels were illegal in the Netherlands between 1911 and 2000, they were generally tolerated as long as no obvious nuisance or exploitation had occurred. As for street prostitution, both soliciting and purchasing sexual services had also been tolerated as long as it had occurred in the so-called "tippelzones" that existed in the major Dutch cities (Hubbard, Matthews & Scoular 2011, p. 2). As such, though it has never been entirely illegal in the Netherlands, there have been strict regulations concerning when, where and how sexual services may be sold and bought. An important change to the legislation occurred in 2000, when pragmatic tolerance was replaced by a legalization of sexwork and prostitution and the integration of (licensed) brothels into the formal economy (ibid.). The legislation was passed largely on the assumption that it would provide better protection for the most vulnerable sexworkers such as underage workers and trafficking victims (ibid. pp. 8-9). The legalization model means that prostitution and sexwork are legal professions under certain circumstances, set down by the state. Sex services can only be sold under regulations governed by both criminal law, but also labor laws and other types of legislation. These regulations are what makes the legalization model different from decriminalization models. Mandatory health checks, work permits, licenses for brothels and adherence to tolerance zones are some of the regulations in place for the sex industry in the Netherlands. Brothels were legalized and the criminalization of

"pimping" was removed at the same time. A minimum age of eighteen for sexworkers was set, though it has now been changed to twenty-one. The responsibility for enforcement, management and administration of the sex industry was given to the Dutch municipalities, which were required to draw up their own bylaws and licencing codes to regulate how brothels were to be operated, and to provide basic services and protection of the workers' physical and mental health. The municipalities also became responsible for enforcing the regulation of prostitution in cooperation with other authorities such as the Aliens Department, the Factories Inspectorate and the Tax and Customs Administration (ibid. pp. 9-10).

The Dutch government does have some measures of support for those that "would like to leave prostitution", for instance through providing help with submitting complaints and providing information about rights and obligations. There are also "leaving the life" programmes available for sexworkers, in which they receive support and help finding other work, a new home or appropriate care (Government of the Netherlands, n.d.). Other measures in place as a result of legalization are there to allow control and oversight over the industry, for instance through making it compulsory for sexworkers to carry identity cards (Oudtshoorn 2004, p. 172).

As in Sweden, there are non-governmental organizations and unions in the Netherlands that advocate for the rights and health of sexworkers, and that can offer support and help when needed (Sexwerkexpertise, n.d.; Prostitution Information Center, n.d.; Red Light United, n.d.). These organizations have also been influential in protesting against governmental measures to restrict or control aspects of the sex industry in the Netherlands. Many are also focused on ensuring the rights and livelihoods of migrant workers, who may not be able to enjoy the rights that Dutch sexworkers are ensured (ibid.). Some of these organizations work as labor unions, providing legal advice and support, and some (Soa AIDS Nederland, n.d.) are working primarily to prevent STDs and STIs among sexworkers.

It is important to note that on the 15th of March 2020, based on emergency orders due to the COVID-19 pandemic, all licenced brothels in the Netherlands were closed. Apart from losing their source of income, sexworkers were especially hard-hit by the pandemic, as most were not eligible for economic relief from the government. On May 18th, 2021, sexworkers were allowed to begin working again (France-Presse 2020).

1.3 Terminology

The concepts of prostitution and sexwork are not uncontroversial. The debate around which term is most appropriate runs parallel to the broader debate on sexwork that has incused Western feminism in the last few decades. The intricacies of this debate and the multitude of positions that feminists adopt within it will be dealt with in more detail later on, but for now it is sufficient to say that the main dividing line concerns whether prostitution and sexwork should be seen as work in the conventional sense of the word, or as an iteration of violence (Jaggar, 2018 pp. 110-111). The terms "sexwork" and "sexworker" are most often used by those occupying the first position, while "prostitution" and "prostitute" or "prostituted person" are most often used by those who occupy the latter, though this division is not always entirely clear. It should also be noted that, apart from being associated with very different ideological positions, these terms also differ in their respective associations. While "prostitution" is commonly associated with the act of exchanging sexual services (most often heterosexual penetrative sex) with money or resources, the term "sexwork" can be used to connotate a range of acts and services, including but not limited to: stripping, escorting[2], sugar-babying[3] and pornographic work (Haak 2019, pp. 68-69; 104). What follows from this is that the term chosen can be seen as a standpoint. Since this thesis builds on interviews with persons engaged in sexwork,

[2] Escorts are generally independent contractors who offer their time for money, often to wealthier clients. Escorting can, but does not necessarily involve sexual services.
[3] Sugar babying, also called sugar dating, refers to a transactional sexual relationship between an (often older) wealthy person and a "sugar baby". Payment can be received by way of money, gifts, or other material benefits in exchange for companionship or a dating-like relationship.

the terms and definitions that they choose to use can actually in itself provide a lot of information about how they experience their lives.

As the aim in this thesis is to conduct the analysis from as neutral a position as possible, no single term will be used. When it comes to previous research and theoretical discussions, the terms are often used interchangeably. However, sometimes one term is privileged over another for ideological or political reasons. During the interviews, all of the participants requested that the term "sexworker" be used to refer to them, as was deemed more neutral than e.g. "prostitute". For this reason, the term "sexworker" will be used when discussing the interviews and in the analysis section. The choice to use the terms that were used by the interviewees was thus deliberate, and a key part of the bracketing process which is elaborated in the methodology section. Through using terminology preferred by the interviewees in this study, I attempt to limit the potential influence of my own preconceptions, attitudes and beliefs about what prostitution and sexwork entails on the analysis.

Some delineations will be made with regards to the kinds of sexwork that are implicated in this essay. These terms will primarily be used to describe transactions involving sexual acts in return for money or other resources. These acts can also take place online, for instance through so-called "cam-by-minute"[4] sexwork. Often, persons engaged in sexwork provide a range of services, for instance stripping, camwork or phone sex as well as "full service"[5] sexual services. In this thesis, sexwork is defined as a transaction involving any type of sexual act, and no delineations will be made with regards to the sexual orientation or gender identity of either the seller or the buyer. Importantly, this thesis does not discuss the issues of child prostitution or sex trafficking at length since they, though related, are important issues in their own right.

[4] Performers are paid by the minute for a private (pornographic) show. The customer can make requests for specific sexual acts to be performed.
[5] Sex work that involves in-person sexual activity with a client, such as vaginal, oral or anal sex.

2. Literature review

The academic literature on prostitution and sexwork increased significantly during the last few decades of the 20th century, likely due to the the public health crisis constituted by the AIDS epidemic and the increased scholarly attention to issues such as trafficking (Pocock 2015, p. 11). While these are important issues worthy of scholarly and legislative attention, they have not provided the full picture of the field. Research on sexwork and prostitution has and is being done in fields as diverse as medicine, law, sociology, anthropology, geography as well as political science. It should be noted that while quantitative studies, especially related to rates of violence, disease, arrests and abuse are rife (see for instance Zara *et al*. 2021; Nzila *et al.* 1991; Benoit *et al.* 2018), qualitative studies into the living conditions and "life-worlds" (Brinkmann 2022, p. 18) of sexworkers are not as common. What will follow here is a summarized review of research deemed to be of the most relevance to this particular project. This literature review will also serve to illustrate the gap in research that this thesis aims to at least partially address.

2.1 "The sex wars"

In the late 1970s and early 1980s, collective debates among feminist concerning issues related to sexuality and sexual activity took place. These debates have in hindsight been termed "the sex wars" and deeply divided the western feminist movement. The debates concerned issues of pornography, erotica, sexwork/prostitution and BDSM, to name a few, and continue to influence feminist debates to this day (Ferguson 1984, pp. 106-07). These "sex wars" provide important context on the different positions on sexwork/prostitution that are commonly held by feminists.

Jaggar summarizes the main positions within these debates in the context of sexwork and prostitution. Radical feminists tend to argue that prostitution is "the archetypal relationship of women to men". It is also insisted that prostitutes/sexworkers are all women and that sexwork is an expression of gender inequality and men's violence

against women. Radical feminists, according to Jaggar, tend to see the social function of prostitution as an institution to assert the dominance and power of men over women, making it in theory similar to rape. Radical feminists unsurprisingly want to completely eliminate prostitution and sexwork through eliminating both the supply of paid sex and the demand for it (Jaggar 2018, pp. 106-109).

Liberal feminists, on the other hand, tend to argue that prostitution and sexwork should be decriminalized, though not all liberals agree on its moral status. Some liberal feminists claim that prostitution and sexwork is oppressive and degrading while others see nothing wrong with it as long as it occurs between two consenting adults. Liberal feminist arguments on prostitution tend to center on ideas of equality before the law and individual rights. As such, it is argued that prostitution and sexwork *ought* to be seen as any other business transaction, where the state may regulate certain aspects of this transaction by law (Ibid. pp. 102-104).

Jaggar lastly discusses perspectives on sexwork which sees it as potentially empowering, highly skilled and socially valuable. According to Jaggar, some feminists argue that not all sexworkers identify with the discourse present in either of the other perspectives. They claim that sexwork can be a positive and stable occupation, offering an income, flexible working hours and considerable control over the working environment. Some further argue that it is a highly skilled occupation, similar to entertainment artistry or even therapeutic work, and that sexwork can in fact be a way to resist narrow sexual and moral principles and stereotypes about female sexuality. It is also often pointed out, as will be made even more clear in the research discussed further on, that criminalization may harm more than it benefits, and proposals to ban prostitution for the protection of the prostitutes tend to be rejected on these grounds (Jaggar 2018, pp. 60-61).

2.2 Phenomenological research on sexwork

Phenomenological research on sexwork and prostitution within political science is rare. Studies that have been done have focused on the psychological impact of street sexwork and factors affecting support seeking (Gorry, Roen & Reilly 2010); the relationship between sexwork and massage parlors (Monk-Turner & Turner 2017); the psychological impact of stigma (Tomura 2009), to name a few. A key study that was consulted during this research process was a 2022 study by researchers at Johns Hopkins University titled *In Our Own Voices:The Lived Experience of Sex Workers in Philadelphia who Identify as Women.* The researchers examined participants' experiences of health-related concerns such as food insecurity and personal safety using a quantitative survey, but the study also included a qualitative aspect. Using hermeneutic phenomenology and an explicitly feminist theoretical basis, the researchers conducted interviews and thematic analysis to examine the participants' perceptions of agency, autonomy, resistance and social support. It was found that, despite difficult or constraining circumstances extraordinary emphasis was placed on personal agency and autonomy by the participants, strongly emphasizing their own personhood and challenging negative stereotypes and narratives about sexworkers (Trout, Ayyagari and Grube 2022, pp. 726-727). This thesis builds upon these findings further, contributing to the knowledge and understanding of sexworkers lived experiences.

2.3 Sexworker vulnerabilities, strategies of resistance

Cecilia Benoit and Andrea Mellor's paper on alternative structural interventions to promote the health, safety and rights of sexworkers examines the underlying structural causes of sexworkers' vulnerabilities (Benoit & Mellor 2023, p. 202). The authors have put together research from different parts of the world to discuss the ways in which societal inequalities and marginalization are rooted in patriarchal, racist and heterosexist beliefs and how these beliefs become enmeshed in economic, social and political structures (ibid. pp. 203-206). The paper has an explicitly intersectional starting point, with the authors arguing that the lives and experiences of

individuals or groups lie at the locus of these intersecting structures that in turn shape their ability to access social goods such as economic support, welfare programs and housing programs. It is due to this that the authors believe we need to consider structural interventions *beyond* legal reform that could potentially improve sexworkers' lives (ibid., pp. 202). Structural interventions are defined as "strategies that bridge rights and policies and promote health, well-being, and dignity for marginalized groups by altering the structural context within which their health, safety, and well-being are produced and reproduced" (ibid. pp. 202-203).

In the article, a range of research is presented, including studies related to housing and the physical environments of sexworkers. While there are many different factors impacting access to housing, sexworkers are deemed to be especially vulnerable due to the already deep-rooted stigmatization they face in their everyday lives. Apart from housing, the physical environments of sexworkers can be health-determining factors as well. Focusing both on legal regulation on street-level solicitation, as well as municipal planning instruments, zoning regulations, expropriation and surveillance, the researchers show how sexworkers are being systematically removed from urban landscapes. The gentrification of historically red-light districts has driven sexworkers into unfamiliar areas of cities, restricting their movements and made it much more difficult for them to work and live safely. The researchers thus call for community action and more equitable urban planning to ensure safe and accessible housing on the one hand, and safe workplaces on the other (Benoit & Mellor 2023; Macon & Tai 2022; Fiolka *et al.* 2022).

Benoit & Mellor also present research on the impact of the COVID-19 pandemic on the workplace health and wellbeing of people engaged in sexwork. It is argued that the already existing vulnerabilities of sexworkers, such as migrant status, economic instability and drug use, were worsened as a result of the pandemic. It was found that sexworkers have less access to income support and welfare programmes as well as healthcare and other crucial services, partially due to welfare and labor policies but also due to the stigma associated with sexwork. The researchers call for a closer

examination of income support policies and other forms of economic assistance to support the autonomy of sexworkers, especially in times of crisis (Benoit & Mellor 2023; Pearson *et al.* 2022).

Several studies indicate that sexworkers tend to be at higher risk of violence, including physical and sexual assault, threats and coercion (Sanders 2016; Deering et al 2014). Further, researchers have also found that women of color and other marginalized groups are disproportionately affected by this violence in prostitution and sexwork (Vanwesenbeeck 1994; Logie et al 2011). Researchers argue that the origins of this violence lies in the interlocking cultural, social, economic and political dynamics that create, structure and sustain the lived realities of sexworkers (Sanders 2016, p. 94). Sanders (2016) further argues that violence against sexworkers is not inevitable, but rather dependent on three main factors that render them more vulnerable to violence and discrimination. The first is the environment within which sexwork takes place, the second is the way in which sexwork is governed and dealt with by the state, and the third is the stigmatization and social status of sexworkers (ibid., p. 95). Further, Sanders points out that violence is not experienced by all sexworkers, and not necessarily in the same ways. For instance, she argues that male or trans sexworkers often are subject to more violence as a result of their double stigmatization as gay/trans and as sexworkers (ibid., p. 98). She also points out that different types of sexwork may render sexworkers differentially vulnerable to violence: street sexworkers, for instance, tend to be more vulnerable than high class escorts (ibid.). As such, sexworkers' vulnerability to violence is argued to be located in the circumstances around their sexwork, and not necessarily in the work itself.

In the book Sex and the City: Geographies of Prostitution in the Urban West (2019), Philip Hubbard examines the spaces of sexwork in contemporary Western cities and the multitude of ways within which they shape the lives of sexworkers and their clients (Hubbard 2019, pp. 3-4). In the last chapter, the author writes about resistance, specifically in the shape of peer networks, friendships and community among sexworkers, and the range of different ways in which sexworkers resist or distort

attempts to control them (ibid., p. 181). Hubbard argues that it is crucial to take these attempts at resistance into account, in order to avoid reproducing essentializing accounts "where sexworkers are depicted as powerless in the face of social and legal constraint" (ibid.). Centering on ideas of space, the author argues that sexworkers resist control or oversight through creating or transforming spaces of sexwork where they can go unnoticed by police or government authority (ibid., p. 183). This is also done through the creating of (informal) communities of sexworkers, sharing information and advice with each other, even in highly competitive environments (ibid., p. 186). The author discusses these actions as important strategies of resistance among sexworkers, but also stresses that not all of these strategies ought to be celebrated. These strategies are employed by sexworkers to take control over their lives in the face of a dominant sexual-moral order that stigmatizes and demonizes them, and it is important to remember that this is why they exist. The fact that sexworkers have to employ these strategies of resistance in order to hide or manage parts of their lives, is not a positive sign that sexwork is becoming more accepted as a legitimate form of work, according to Hubbard (ibid., p. 193).

2.4 Sexwork in Sweden

The concept of "sexwork" legally does not exist in Sweden. In legal documents, evaluations and parliamentary debates, the term "prostitution" is used exclusively (see for instance Interpellation 2022/23:36; Motion 2023/24:2692; BRÅ 2022). In some parts of this section, I have chosen to use the word "sexwork" instead, not only because it encompasses a broader range of services, but also out of respect for the interviewees. It should also be noted that intersectional research on sexwork and prostitution is rare in Sweden (few examples include Holmström *et al*. 2020; Hearn *et al*. 2016), indicating a research gap that this thesis attempts to at least partially address.

In an official evaluation of the impact of the law against the purchase of sexual services (*sexköpslagen*) ordered by the Swedish government, researchers conducted several empirical investigations into the sex industry in Sweden using a range of

methods and approaches. The researchers concluded that the law had led to overall lower rates of prostitution, especially street-based prostitution, which strengthened the claim that the law had reached its intended goal of reducing the demand for paid sex. It is also found that the law has had a considerable normative impact in Swedish society, especially among young people. Overall, the evaluation paints a positive image of the Swedish law criminalizing the purchase of sexual services, though the authors point out there is definitely still room for improvement (SOU 2010:49).

This positive portrayal of the law has however been contested by Dodillet and Östergren (2011). The researchers consider the law against purchasing of sexual services in the context of several other laws, such as the Pandering law, and outline how the framework constructed through these laws carry negative consequences not only for the buyers, but also for those selling sex (ibid. pp. 3-6). As for the buyers, Dodillet and Östergren claim that there is ample empirical evidence that the law in fact has little effect on the buyers' motivation. They cite client interviews conducted by the board of health and welfare showing that the decision whether to buy sex of not was linked to other factors than to the fact that it was criminalized (ibid. p. 14).

Further, the authors contest the claim that the support for the law amongst the population comes from a general view of prostitution as a general problem, and not as an expression of gender inequality. In several surveys conducted both by SIFO and by independent researchers, a majority of respondents not only wanted the purchase of sex to be criminalized, they also wanted the selling of sex to be illegal. This indicates that sexworkers in Sweden still face high rates of stigmatization (ibid. pp. 17-18). Finally, the researchers go through some "unintentional effects" of the law. These effects primarily pertain to sexworkers' wellbeing, level of trust in authorities, police and the legal system, and reliance on third parties[6] (ibid., p. 21). According to the researchers, the law risks preventing sexworkers form seeking help or support from authorities for risk of being outed, and also argue that it may stop the provision

[6] The term "third party" refers to individuals or groups that organize or facilitate commercial sex between a seller and a buyer.

of crucial services such as HIV-prevention (ibid., pp. 23- 24). It was also pointed out that because there are overall fewer clients available, sexworkers in Sweden not only have a more difficult time supporting themselves financially, but they also may be forced accept more dangerous clients that they otherwise would not have accepted, making them more vulnerable to violence and abuse (ibid., pp. 21-24). Dodillet & Östergren (2011) as such not only question the claim that the Swedish legislation around sexwork has managed to accomplish its stated aims, but they also argue that the law may in some cases render sexworkers in Sweden more vulnerable or prone to risk-taking behavior during exchanges.

Niina Voulajärvi has written extensively about the Nordic model of prostitution legislation. In her article, Vuolajärvi (2018) presents her research findings from years of ethnographic fieldwork and interviews conducted in Sweden, Norway, and Finland. She argues that despite claims that the Nordic model "protects" vulnerable women in prostitution, the laws may actually have the opposite effects, at least for some. She examines the law carefully in relation immigration policies, and argues that there has been a shift from regulating commercial sex to immigration policies which result in a "double standard", manifested in the differences in governance of national and foreign/immigrant sellers of sexual services (Vuolajärvi 2018, p. 152). While national sexworkers are given (some) support through social welfare policies, primarily through encouraging exit from commercial sex through e.g. counseling, foreign sexworkers are often excluded from these services, and are also often subject to punitive measures such as eviction or even deportation (ibid.). As such, Voulajärvi claims that there is a dissonance between the model's stated aim of protecting women in prostitution, and how it actually works in practice, putting some (migrant) sexworkers in a more vulnerable position, having to risk losing their incomes and their homes (ibid., p. 152).

Lastly, a report financed by the Swedish ministry of public health (Folkhälsomyndigheten) from 2020 examined the self-reported general health and wellbeing among individuals selling sexual services in Sweden (Holmström *et al*.

2020). The study was based on quantitative survey-based data from persons with experience of selling sex in Sweden (pp. 13-14). The survey included questions on physical and mental health, sexual health and access to social services, but also questions on topics such as abortion, parenthood and sexual and romantic relationships (ibid.). Overall, the respondents reported lower rates of overall health and wellbeing than the general population. The rates were even lower for transgender respondents, a trend that remains throughout the report (ibid., pp. 27-28). Only a fourth of all respondents reported getting help and support from government agencies or non-governmental organizations that offer it, and almost half of respondents reported that they avoid seeking medical care such as STI testing due to the stigmatization associated with sexwork (ibid., pp. 43; 35-36). When measuring respondents' perceptions of their sexual health, the researchers further found that lower rates of sexual health were closely linked to variations in sex, gender identity, age, country of birth and physical and mental variations. As such, these factors have an important impact on respondents' perceptions of their own health and wellbeing (ibid., pp. 31-32). The responses also indicate that persons with mental or physical disabilities experience higher rates of violence. This is also the case for persons identifying as women or trans, and for those identifying as queer or homosexual. Migrant sex workers also generally experience higher rates of violence in relation to sexwork, as do younger sexworkers compared to older (ibid. pp. 46-48). This study thus offers a novel and complex perspective on the physical and psychological health and wellbeing of sexworkers in Sweden, what potentially makes them more vulnerable to violence and disease, and how this relates to the respondents' identities and backgrounds.

2.5 Sexwork in the Netherlands

The amount of research on the sex trade in the Netherlands that I could take part of was inherently limited due to the fact that I do not understand Dutch. As such, the research presented here is limited to the studies I deemed relevant that were written in English. For some of the background research, efforts were made to translate government documents and official publications, but due to the limited amount of

time I had to conduct this study, this could not be done for all research that was found.

In a 2011 article, Ine Vanwesenbeeck provides an evaluation of the Dutch legislation around sexwork and discusses its potential impacts on the well-being of sexworkers (Vanwesenbeeck 2011, p. 3). Discussing the development of Dutch prostitution policy since the legalization of brothels in 2000, the article centers on the claim that "repressive prostitution policies", i.e. those that attempt to curb or overly control prostitution through state measures, tend to actually perpetuate the violence and abuse they claim to combat. The researcher argues that since the policy change in 2000, a strict system of regulation of the sex industry has been put in place, including licensing of brothels and other related establishments, in combination with several anti-trafficking measures (ibid., p. 8). Specifically, Vanwesenbeeck argues that these measures, meant to prevent migrants from being trafficked and exploited in the Dutch sex industry, tend to actually push migrants into the hands of exploitative third parties (ibid., p. 7). This is due to the fact that in order to work in the legal sexwork sector, migrants must have valid residence permits, something that is more difficult to achieve for non-European women (ibid., p. 12). As such, non-EU migrant sexworkers run a higher risk of ending up in the illegal sexwork sector, potentially being subject to exploitation and abuse. She also cites research from UNAIDS which shows that repressive measures against sexworkers tend to increase their vulnerability to HIV and AIDS due to restrictions in access to health services (ibid., p. 4). Through these examples, Vanwesenbeeck argues that strict regulation of prostitution may actually put sexworkers more at risk for violence, abuse and disease.

Further, reviewing a range of previous research as well as interview data from sexworkers, the researcher concludes that negative health consequences of sexwork, such as psychological distress, are not so much associated with sexwork in itself, but rather sexwork under certain circumstances. The primary factors that determined the health and well-being of sexworkers were found to be the quality of working condition and relations in work sites, along with the quality of support structures such

as medical care and counseling (ibid., p. 15). Vanwesenbeeck suggests that improving the working conditions and access to crucial services for sexworkers, combating exploitative pimps and improving the status of migrant sexworkers are three crucial ways to improve the wellbeing and reduce the vulnerability of Dutch sexworkers (ibid., p. 16-17).

A key measure for supervision and control over the sexwork sector was introduced in 2013: Mandatory "intake" interviews with authorities for those who want to work as sexworkers or prostitutes in the windows. In her article, Maite Verhoeven (2017) argues that the government's measures to offer help and protection can in fact be read as means to control, restrict and discriminate against sexworkers (ibid., pp. 373-374) The new policy of interviews with potential new sexworkers is based on the idea that it is possible to "filter out" especially vulnerable individuals that are potential victims of human trafficking (ibid., p. 372). The interviews involve questions about pimps, so-called "loverboys", or boyfriends, and language and cognitive skills are examined (especially for migrant workers). If the individuals are found to not be self-reliant (e.g. when they are dependent on a third party or have insufficient language skills), they can be denied work (ibid.).

The researcher used interviews with sexworkers in the Netherlands in order to explore the meaning and effects for sexworkers of this new policy. While some of the interviewees expressed positive experiences with government representatives and support services for sexworkers, others pointed out that the mandatory intake policy could be seen as a form of control or even discrimination. Especially for migrant sexworkers, whose main concern was earning enough money to send back home, the government's policies were perceived as preventing them from doing the work they had to do (Verhoeven 2017, p. 375-376). Further, some reported that they withheld information from the government, such as relationship status or relation to a third party, because they feared to be labeled as "dependent" and thus denied work (ibid., p. 376-377). The author writes that this distrust in the government and the local municipalities could potentially affect whether sexworkers feel that they can voice

their concerns and problems in the future. Further, if the sexworkers were given a "negative recommendation" as a result of failing the intake interview, they tended to leave and "disappear out of sight" of the government, moving somewhere else to work or working illegally (ibid., p. 377). Verhoeven ends her article by emphasizing that the government's measures to "help" sexworkers can sometimes be interpreted as means of control, potentially driving sexworkers to withhold crucial information or to work unregistered, which would end up making them even more vulnerable (ibid., p. 378).

The city of Amsterdam is often the focus of sexwork and prostitution research, due to the well-established red light district De Wallen and its historical associations with the sex industry. Several studies relevant to this research project have been done, specifically using Amsterdam as a paradigmatic case study. Aalbers and Deinema (2012) examines the state-assisted "third wave" of gentrification of the red light district in De Wallen, arguing that the Amsterdam City Council has historically tried to restrict window prostitution in the area in order to increase economic activity – a practice that is still actively ongoing (p. 120). The researchers specifically look at plan 1012, a policy explicitly meant to alter the character of the red light district in order to counter criminal practices in the sexwork industry (ibid.). However, the researchers argue that rather than combating illegal aspects of the industry, such as coerced sexwork and trafficking of minors, the city aims to entirely transform the nature and character of the historical district, effectively displacing the sexworkers that live and work there (ibid., pp. 136-138). The researchers point out that the plan likely will result in a decline in working conditions of Amsterdam's sexworkers – closing the spaces for window prostitution in Amsterdam will likely not lead to a decline in sexwork, but will rather push sexworkers to work in other spaces, where there is less oversight and control over the working conditions (ibid.). A lack of oversight and safe spaces for sexworkers to live and work risks making sexworkers more vulnerable to labor exploitation (such as unfair working arrangements with third parties) and violence from customers (ibid., p. 138). This article becomes all the more salient when considering the current policy proposal to create a so-called

“erotic center” that would relocate sexworkers to an area on the outskirts of Amsterdam (McDonald-Gibson 2023).

3. Theoretical framework

In this thesis, a theoretical framework based on intersectionality theory is used. This theory was chosen partially because of its close connections with the chosen methodology of critical phenomenology. As Kinkaid writes, phenomenological accounts become critical through “engaging with social and political analyses of particular, historically situated social relations and foregrounding issues of social justice, of racial inequality, of gender and sexuality” (2020, p. 171). Since this thesis uses critical phenomenology as method, there thus needs to be an awareness of social, historical and political factors throughout and within the research process. One way to ensure this is to utilize an intersectional theoretical framework for the analysis, which is what is done in this thesis.

Intersectionality, through its focus on interlocking forms of oppression and power, has the potential to problematize notions of vulnerability and resistance in the context of sexwork, and to help us understand how sexworkers’ identities and backgrounds impact their experiences of sexwork. Specifically, intersectionality theory posits that neither law nor policy are ever politically “neutral”, but rather affects different groups and individuals differently based on factors such as race, class, sexuality, ability and gender. Further, intersectionality theory has emancipatory ambitions, meaning it has the potential to not only take this range of experiences into account, but also to try create a reality where all of these experiences *matter* and can be heard, and importantly, creating space for resistance. Thus, rather than advocating for a certain philosophical or legal framework for understanding sexwork and prostitution, this thesis uses aspects of intersectionality theory to bring to the fore experiences and voices that seldom are allowed to coexist in research, media and political processes (Spade 2023, p. 1031).

In this thesis, five key concepts within intersectionality theory are used to form the theoretical framework. The concepts of vulnerability and resistance serve as the central parts of the analysis, effectively relating it to the research question. Three other concepts related to vulnerability and resistance, namely abjection, agency and stigma, are also used, in order to complement the broader concepts, and to sharpen the focus of the analysis on the aspects of the interviewees' experiences that they emphasized.

3.1 Intersectionality

Intersectionality theory was pioneered by black feminists in the late twentieth century and was founded on the idea that the mainstream feminist and antiracist movements at the time did not adequately recognize the interests of women of color. Kimberlé Crenshaw and Patricia Hill Collins are recognized as the first theorists to work with intersectionality as a theory, and the concept was first introduced by Crenshaw in her 1989 essay "Demarginalizing the Intersection of Race and Sex". The main aim of the theory is to challenge the "single-axis framework" for conceptualizing oppression, vulnerability and disadvantage. The single axis framework only makes visible those who are otherwise privileged except for their singular marginalized identity. In contrast to the single-axis framework, intersectionality theory is focused on examining and making visible how different structures of power emerge and interact (Crenshaw 1989, pp. 151-152). Crenshaw argues that experiences of marginalized individuals cannot be understood simply through ideas of race, sex or class, but that these categories need to be analyzed in conjunction with each other to reveal the multiple layers of oppression at work (ibid.). While Crenshaw in her initial writings on intersectionality argues that her analysis is based and centered on the experiences and lives of Black women, she has later argued that the theory can be used as a dynamic tool in analyzing subjectivities and interacting power relations across different social categorizations (Crenshaw 1989, 91).

3.1.1 Vulnerability

As argued by Brown (2021, p. 79), vulnerability is a highly complex concept. In his book, Brown uses a definition of vulnerability created by Alwang, Siegel and Jorgensen (2001), that is also used in this thesis: the probability of experiencing a loss (...) relative to some benchmark of welfare (Brown 2021, p. 210-211). In this sense, vulnerability is contextual and relative, and not an intrinsic quality of some people or groups (ibid., pp. 10-11). These benchmarks of welfare are similarly difficult to define and measure, but pertain to expectations of health, happiness and security or indeed the social efforts designed to promote the physical and mental well-being of citizens (ibid., pp. 209-211). As such, the quality of being vulnerable is based in the loss or lack of access to these benchmarks of welfare. An intersectional perspective on vulnerability emphasizes that each person is the bearer of multiple identities that are contextually and historically situated. These identities, and by extension the individuals that possess them, operate within and are affected by structures of power. As such, some identities (white, male, rich, cis, heterosexual) tend to be privileged over others (black, female, poor, trans, queer). These identities in conjunction with each other create layers of vulnerability or privilege (ibid., pp. 97-98). Importantly, different people and groups experience vulnerability differently, and to different degrees. An intersectional lens on vulnerability helps us understand the patterning of vulnerability across individuals and groups, as well as the "layering, or multiple forms, of vulnerability that characterizes the experiences of some far more than others" (ibid. p 55). Intersectionality theory can thus help us see how vulnerability is shaped by historical contexts and social change. An important feature of vulnerability is socio-economic: experiences of labor-market exclusion, pay inequalities, access to pensions, housing and health care, among other things (ibid.. pp. 91- 93). However, factors such as stigma, marginalized status, discrimination and stereotyping also help form the vulnerabilities of certain populations, adversely affecting their mental health, wellbeing and social position (ibid., p. 94).

3.1.1.1 Stigma

Related to the concept of vulnerability is the concept of stigma. Goffman (1963) defines stigma as the gap between "virtual" demands and "actual" performances (cited in Brown 2021, p. 42). Essentially, stigma arises when a person's attributes, behaviors or characteristics do not live up to cultural norms, stereotypes or assumptions of how they "ought" to be or behave (ibid). As such, the process of stigmatization happens when a gap emerges between a "virtual social identity", i.e. cultural and social demands of how someone ought to be, and the "actual social identity", i.e. how they are actually interpreted as being (ibid). It involves prejudicial attitudes, beliefs, and values as well as discriminatory behavior, practice, and policies that affect certain groups or individuals negatively (Turan *et al*. 2019, p. 2). Importantly, stigma arises in everyday situations and interactions (Brown 2021, p. 45) and is a gradual process of being negatively judged by others. An intersectional perspective on stigma illuminates the confluence of multiple stigmatized identities within a group or a single individual. It also emphasizes the interrelatedness of different stigmas, and how this affects the vulnerability of individuals that are impacted by them. This perspective can help us understand the multiple, interrelated facets of stigma that sexworkers may be affected by, and how this impacts their vulnerability (Turan *et al.* 2019, pp. 1-2).

Research on mechanisms of resisting stigmatization often involves emphasis on individual agency (Brown 2019, p. 45; 50). These mechanisms can involve educating others and challenging stereotypes on the one hand, but also avoidance and seclusion on the other hand. These latter mechanisms tend to involve self-isolation and can be socially damaging to individuals who use them (ibid.). However, stigma can also be countered or deflected by humor or critique (ibid., pp. 44-45). The concept of stigma thus has connections both to the concept of vulnerability, as some individuals are socially positioned in a way that makes them more vulnerable to stigma, but also to the concept of resistance, as individuals do not necessarily simply accept the process of stigmatization, but rather use a range of tools to resist or counter it. It should be noted that stigma is in itself an analytically expansive concept (see for instance Link

& Phelan 2001; Yang *et al*. 2007), but that in this particular thesis it is used in relation to the concept of vulnerability.

3.1.1.2 Abjection

The concept of abjection is borrowed from Kristeva's (1982, cited in Fahs & McClelland 2016) definition as "that which inspires disgust, repulsion and challenges the borders between self and other". It was developed in order to bring to the fore bodies that are, through language and action, posited as "out of bounds", ignored or seen as unworthy of attention (Fahs & McClelland 2016, p. 393). This notion of paying attention to that which has been hidden from view is key in seeing and understanding the vulnerabilities of certain groups or individuals. The links between gender, race and sexuality has historically speaking associated people – especially women – of color with stigma and negative stereotypes that have adverse impacts on social, psychological and sexual wellbeing. As such, the notion of abjection can be used to critically examine these links in order to deconstruct them, and establish new ways of thinking about race, gender, sexuality and beyond (ibid., p. 401). The concept is relevant here because of the historically controversial and semi-visible nature of sexwork. At least in a western context, sexwork and prostitution has historically been associated with criminality or moral degeneracy, an association that has served to separate sexworkers from "legitimate society" (Rodríguez García, van Nederveen Meerkerk and van Voss 2017, p. 12). Further, due to the semi-legal[7] nature of sexwork in both Sweden and the Netherlands, it is likely that there are some aspects of sexworkers' lives and experiences that are consistently rendered invisible, or abject. As such, this theoretical tool can help us render visible these aspects, and thus to bring a greater understanding of what has previously not been understood. It helps us ask the question: "who or what is made invisible here, and why?"

[7] Semi-legal in that it is illegal to purchase and solicit sex or "encourage" prostitution in Sweden, and in that it is extremely tightly regulated and associated with criminal enterprise in the Netherlands.

3.1.2 Resistance

The idea of resistance runs like a red thread through the theoretical framework. It is a key aspect of intersectionality theory, and is intimately tied to the theory's transformative aims. The idea of intersectional resistance is built upon a critique of "single-axis frameworks" of resistance to inequality, oppression and discrimination. This critique recognizes the failures of seemingly "neutral" administrative governance to alleviate or change the systemically unequal distribution of wealth and opportunities (Spade 2013, pp. 1033-1034). An intersectional perspective on resistance thus aims at building "broad based resistance formations" that involve individuals from a wide range of vulnerable populations that can find common cause in their concerns about issues like inequality, poverty and criminalization. Intersectional resistance mobilizes directly affected communities, and emphasizes horizontal structures, democratic participation and community solutions rather than top-down approaches to political transformation (ibid., p. 1049). However, resistance does not have to take the form of large popular movements, but can also take the form of everyday actions. Taking inspiration from de Certeau's concept of tactics of resistance, we can conceptualize resistance as practices that erode, disrupt or distort prevailing power and governance structures (Yilmaz 2013, p. 67). These practices can be as big as a political demonstration or as small as keeping one's identity hidden from the state and the police, and they can be individual or collective. Resistance is also closely linked to the concept of agency, which is elaborated below.

3.1.2.1 Agency

The concept of agency is key in intersectionality theory. Within the context of this thesis, its meaning is twofold. Firstly, it refers to the capacity of actors to resist, subvert or change conditions of vulnerability. This could for instance be done through self-definition, a concept pioneered by Patricia Hill Collins (1986) that refers to the process of rejecting stereotypes that serve to control and dehumanize. Self definition involves not only challenging the content of the stereotypes and categories, but also the very idea that persons in positions of power have the authority to establish these stereotypes in the first place (Collins 1986, pp. 16-17). Secondly, agency is also

experienced as *absence*, in the sense that actors' vulnerabilities constrain their ability to exercise agency. Factors such as race, sex, migrant status, queerness and ability affect individuals' capacity to define and value themselves, to fight for their rights and needs and to resist stigma and negative stereotypes (Fahs & McClelland 2016, pp. 396-397).

Agency can also be tied to conceptualizations of consent and choice. Standard conceptions of consent, present in e.g. the Swedish consent law of 2018[8], frame it in dichotomized terms, i.e. as something that is given or not given by a potential sexual partner, but the concept has been redefined in more nuanced ways. Some studies have begun to illuminate the complex processes and networks of power within which people exercise sexual agency, choice and consent, and how they navigate and negotiate factors like intention and controlling influences (ibid., pp. 399-400). Further, the notion of agency can also help unpack the blackboxing of "choice". Perhaps especially within the context of sexwork and prostitution, it is not always a question of *either* choice or coercion, but rather a kind of continuum. Not all those who enter prostitution and sexwork do so under coercion, but their choices of livelihood may still be constrained by factors such as race, class, sexuality and ability. Thus, the concept of agency can not only help us understand how the choices and actions of individuals may be constrained by vulnerabilities, it also shows us that these vulnerabilities can and are being resisted and changed in various ways.

These concepts are used to form a framework for analysis. The concepts are operationalized and used to find corresponding themes in the interview transcripts. The analysis is structured around identifying vulnerabilities and strategies of resistance among the sexworkers that were interviewed, and how these relate to and can be understood through the broader theoretical framework.

[8] On 1 July 2018, changes were made to the Swedish legislation concerning rape, meaning that the law is now based upon the absence of consent instead of the occurrence of violence, threats or a particularly vulnerable situation (BRÅ 2020).

4. Methodology

4.1 Critical phenomenology

This thesis uses a critical phenomenological method. Broadly speaking, phenomenological research aims at understanding and describing the everyday experiences of human beings, often through focusing on specific phenomena. This method was chosen for this research project partly because of its focus on the subjective experience as key to understanding any given phenomenon (Ahmed 2006, p. 2). As the aim of the thesis is to understand the experiences of vulnerability and resistance among sexworkers in Sweden and the Netherlands, it made sense to use a method which would bring these experiences to the fore. Using critical phenomenology is compatible with interview studies, and guides the nature of both the interviews and how the data is used, as elaborated further below. Further, the critical aspect of critical phenomenology was deemed useful for this particular project, as it helps situate these experiences within their social, cultural and political contexts (Kinkaid 2020, p. 168). Given the comparative nature of this research project, these contexts becomes especially relevant for the analysis. Lastly, the phenomenological practice of "bracketing" was also deemed relevant in the process of this thesis, as it encourages self-reflection on the part of the researcher and minimizes bias within this kind of research (Alia Al-Saji 2017, p. 144).

While classical phenomenology assumes that there is a kind of "universal" structure or essence that people use in order to make sense of their experiences (ibid., p. 147), and to an extent, that these experiences can be studied objectively, critical phenomenology assumes that this structure or essence is in fact not universal, but rather that it is shaped by factors such as gender, sexuality and race. It is also assumed that that factors like race, gender, and sexuality structure not only the experiences of subjects, but in fact the very ways they perceive and sense these experiences (Kinkaid 2020, p. 171-172). Phenomenology becomes "critical" in the sense that it engages with "social and particular analyses of particular, historically

situated social relations" (Guenther 2013, in Kinkaid 2020, p. 171), and through emphasizing issues of social justice, racial inequality, gender and sexuality (Salomon 2018, in Kinkaid 2020, p. 171). As such, critical phenomenology is especially compatible with the intersectional theoretical framework chosen for this thesis.

Critical phenomenology also turns against the assumption that these experiences can be studied "objectively" and instead argues that the only way to understand any given phenomenon is to examine subjective experiences of said phenomenon (ibid., p. 174). As such, the interviewees' subjective experiences of sexwork, the vulnerabilities they face and the strategies of resistance they utilize will be used as the primary data for analysis.

A key idea within the phenomenological tradition is "bracketing", requiring the researcher to "put into brackets" their preconceived ideas, attitudes and feelings about the world at large and the studied phenomena. According to Alia Al-Saji, "to "bracket" is neither to affirm nor to nullify, but to suspend an attitude, in order to bring into focus its constitutive activity and the web of meaning it has instituted" (2017, p. 144). Conducting this "bracketing" is to make visible the constituting role of consciousness in creating meaning. Within phenomenology it is believed that consciousness grounds experience – it makes possible the experience of a *something.* As such, to "bracket" previous understandings and attitudes as a researcher means showing awareness of this relationship between consciousness and experience and how it could affect the researcher's interpretation of what is being studied (ibid., p. 145). As is elaborated below, it essentially means critically reflecting on one's preconceived notions, ideas and attitudes about the phenomenon being researched and on how these notions, ideas and attitudes may impact the research process. Due to the highly controversial nature of the topic of sexwork, this practice was deemed especially relevant for this thesis, as I as the researcher did not want to let my own ideas and attitudes about sexwork impacting the research process or the result.

A range of methods and materials can be used within this methodology, including qualitative interviews which are used in this thesis. Apart from this, extensive effort has been made to describe and analyze the contexts of sexwork in both Sweden and the Netherlands in order to gain a more holistic understanding of the spaces and contexts within which the sexworkers live and work. As for the analysis, the critical phenomenological method, due to its subjectivist ontology, involves a degree of interpretation, meaning that it requires "reading between the lines" of the data. This kind of analysis requires the researcher to consider context, language and culture during interpretation, and also to take into account their own perspectives and interpretations (Babones 2016, p. 461). As such, it requires reflexivity on account of the researcher.

4.1.1 Bracketing

A key aspect of the phenomenological method, including the critical phenomenological method, is bracketing. Bracketing refers to the process of putting one's own ideas, knowledge and interpretations of the object of research aside. Essentially, it is a way to control for researcher bias and to demonstrate the validity of the data collection, which also makes it an important reason why this methodology was chosen (Chan, Fung & Chien 2013, pp. 1-2).

There is no single way of approaching bracketing, but rather the process has to be adapted individually for the research project at hand. In this thesis, bracketing is a key part of the entire research process, and not just the data collection, as suggested by Chan, Fung and Chien (2013). Bracketing is also related to positionality, which will be dealt with more in depth in a later section.

4.1.1.2 Reflexivity and bias reduction

It was important that I as the researcher was aware of my preconceptions and beliefs about the subject throughout the research process. Though the aim of bracketing is to minimize the effects of these beliefs on the testimonies of the interviewees, it would be impossible to be completely objective. Information and knowledge is always

mediated through human subjects, and so total objectivity is not possible nor desired in phenomenological research. Reflexivity is thus the key activity that helps the researcher become aware of and identify ideas and beliefs that may influence the research process. Reflexivity involves the honest examination of the values and interests of the researcher that may impinge on the research work (ibid., p. 3). Some researchers (Wall, Glenn, Mitchinson & Poole 2004) suggest that the researcher can use a "reflexive diary" throughout the research process to develop bracketing skills (cited in Chan, Fung & Chien 2013, p. 3). This practice was adopted by me during this research process through noting down my feelings, reflections and thoughts on my work, especially in preparation for and after the interviews, but also during the process of analysis. Positioning myself in the debate over terminology also required extensive reflection, which was elaborated in section 1.3. Through this practice I became much more aware of my ideas and beliefs about this subject, and the feelings the interviews raised in me. This allowed me to put these aside to a greater extent, and to let the data speak for itself.

Chan, Fung and Chien (2013, pp. 4-5) further elaborate on bracketing during data collection, and argue that semi-structured interviews using an interview guide and open questions can aid this, and allow the participants to express themselves more freely in relation to the researcher. For instance, there were many instances where the interviewees expressed experiences or knowledge of policy aspects that I had no knowledge of, and so throughout the interviews I took care to maintain my curiosity and humility regarding what I might not know or understand. Recording and transcribing the data verbatim also allowed me to base the analysis directly on the interviewees' own words. Lastly, Chan, Fung and Chien (2013, p. 5) suggest that the researcher returns to the interviewees during or after the analysis to validate the interpretation of their data, which was also done in this research project. This allowed the interviewees to confirm or reject the interpretation of their data, and to potentially provide more information that could help accurately interpret their experiences.

4.2 Interviews

As Svend Brinkmann argues, conversations are a rich and indispensable source of information about personal and social aspects of people's lives (2013, pp. 3-4). Because the aim of this thesis is to understand the experiences of sexworkers this was deemed a suitable method. In this particular thesis, semi-structured qualitative interviews are used. Semi-structured interviews are essentially the half-way between structured and unstructured interviews; they allow the researcher more freedom to follow-up on questions or to restructure the questions to better fit the conversational pattern, and allow the interviewee to take up more space as a knowledge-producing participant in the research process. However, the researcher still retains a certain degree of control over the interview, still being able to focus the conversation on issues or topics deemed relevant to the research question (ibid. 19-21).

Interviews do not only differ in terms of structure, but also in terms of style. Wengraf (2001; in Brinkmann 2013, pp. 31) has introduced a productive distinction between receptive and assertive interview styles. During the interviews for this thesis, a receptive interview style was used, meaning that I as the researcher took up less space during the interviews, allowing the interviewees a greater degree of control over how they chose to interpret and answer the questions. This interview style was largely chosen due to the importance of the interviewees feeling comfortable sharing their experiences and thoughts, as well as the ambition to gain a rich and deep understanding of these experiences through letting them speak more freely. These are also the reasons for choosing to do one-on-one interviews, rather than for instance focus groups.

The interviews were conducted either face-to-face, over zoom or over the phone. These mediums both had the advantage of allowing for certain non transcribable features of the interviews, such as tone of voice or mood (ibid., pp. 28-29). During the face-to-face and zoom interviews, the facial expressions and body language of the interviewed were also used as sources of information. Telephone interviews, on the other hand, have the advantage of allowing a certain degree of anonymity to the

interviewee (which in this case was requested), and were also more cost-and time efficient (ibid., p. 29). The interviews were recorded with the consent of the participants.

Once the interviews were conducted, the recorded interviews were transcribed verbatim into text, and aspects such as body language, facial expressions and tone of voice were noted to the greatest extent possible in order to gain as much information of the interviewee's perspectives as possible. After transcription, a focused analysis of the material was carried out.

4.3 Comparative research

The research resign has a comparative aspect, in order to examine the commonalities and differences in the experiences of the sexworkers/prostitutes in Sweden and the Netherlands. As will be made clear, Sweden and the Netherlands differ in many ways, perhaps most evidently in their respective legal regimes, regarding sexwork, and through comparing and contrasting the two, valuable insights can be gained from both cases. As has been noted by several researchers, perhaps most recently Scaramuzzino and Scaramuzzino (2014, p. 4), laws are complex, and what on the surface appears to be the absence of regulation may actually contain regulatory measures. As such, despite their apparent differences, legalization (the Netherlands) and client criminalization (Sweden) may lead to similar outcomes in their implementation. Interviewing sexworkers from Sweden and the Netherlands and comparing the data can thus to a greater degree help us understand how the respective regulatory regimes impact the vulnerabilities that sexworkers face and the strategies of resistance that are available to them. Further, through learning about the experiences of sexworkers in both countries, we can hopefully gain some insight into what *works* (and what does not work), policy-wise, in each case.

This research will most closely approximate a most different systems design (Levy 2008, p. 10), as the policy around prostitution and sexwork differs greatly. The experiences of sexworkers in Sweden and the Netherlands are compared in this thesis

in order to understand whether there are similarities in these experiences despite the very different legal and political frameworks. Especially interesting is examining whether the sexworkers that were interviewed experience similar levels or causes of vulnerability, abjection and stigma, which tactics of resistance tend to be used in each context, and why. Lastly, through comparing interview data, this thesis aims to go beyond simply comparing the legislation around sexwork and prostitution in Sweden and the Netherlands, and instead focus on the sexworkers' experiences of what it is like to do sexwork in practice in each country. Through this, it is the hope to contribute to a better understanding of how this legislation actually works in practice in each country, and how it impacts the people that are affected by it.

4.4 Material

For this research, five semi-structured qualitative interviews were conducted. The participants were two interviewees with experience of living and working as sexworkers in the Netherlands and three interviewees with experience living and working as sexworkers in Sweden. All participants were active sexworkers. The participants were chosen using purposive sampling (Halperin & Heath 2012, p. 430) due to the sensitive nature of the topic, and because of the difficulty in reaching out to participants. The following organizations were contacted when trying to find interviewees: Inte Din Hora (Sweden), Red Umbrella Sweden (Sweden), Nätverket PRIS (Sweden), FuckFörbundet (Sweden), Prostitution Information Center (Netherlands), SekswerkExpertise (Netherlands), and PROUD Nederland (Netherlands). Out of these organizations, Red Umbrella Sweden responded, offering to send my information out to their members, and PIC Amsterdam also responded, setting up two interviews with members. It is important to note that the interviewees are members of organizations that have a generally positive view towards the decriminalization/legalization model of sexwork/prostitution (Red Umbrella Sweden, n.d.; PIC Amsterdam, n.d.). This may impact the responses from the interviewees and thus the results of the research, especially their responses related to national policy around sexwork. However, it is the ambition to minimize this impact through avoiding leading questions and focusing on the individual experiences, beliefs and

opinions of the participants. Further, the interviewees had vastly different backgrounds and experiences with sexwork, both positive and negative, which may also reduce bias resulting from the political attitudes of the interviewees (Hammersley & Gomm 1997, 1.7-1.8) Still, this should be kept in mind when analyzing the results.

Further, the results may be impacted by other forms of sampling bias, such as self-selection or under-representation bias, where some participants are more or less likely to want to participate in this type of research due to pre-determined characteristics (ibid., 1.6). In the context of this study, it is important to note that all those interviewed were members of organizations or unions for sexworkers and prostitutes, and the interviews were set up through these unions. As such, sexworkers or prostitutes that are not part of these groups were not consulted, which may include individuals who have vastly different experiences than those interviewed. For instance, it is reasonable to believe that it would be more difficult to establish contact with those who are coerced into sexwork or prostitution, or those working or living illegally due to fears of being discovered or doxed. This also needs to be kept in mind when interpreting the analysis and results of this paper.

Two of the interviews were conducted in person, two over the phone and one over zoom. The interviews with the sexworkers in the Netherlands were held in English. The in-person interviews were conducted in the PIC offices in central Amsterdam, a space where the interviewees felt comfortable to share their experiences. The interviews over the phone were conducted through having the interviewees call me from a hidden number to protect their identities and personal data. No information regarding location was collected. The interview over zoom was conducted through sending out a zoom-link to the interviewee's chosen email address. All participants signed a consent form, found in appendix D.

The reason behind not all interviews being conducted in person was due to the interviewees requesting it be done over the phone or zoom to ensure their anonymity.

The interviews were between forty-five minutes and one-and a half hours long, providing rich and detailed data. The semi-structured interviews were conducted using an adaptable interview-guide (see appendix A). This allowed both for a range of questions that were deemed appropriate for the topic, but also for flexibility for the interviewees to shape their own answers. It also allowed for questions that were not originally part of the guide, but were nonetheless important and relevant to the research question. Further, through creating this interview guide, it was possible to reflect over the nature of the questions before the interviews, to make sure that they were not perceived as leading, critical or partial.

The interviews in Swedish were translated into English in order to allow for a common coding scheme and comparison. Translation is associated with its own problems, including the risk of missing linguistic nuances that may be of importance to the analysis (Qoyyimah, 2023, p. 4). However, since the focus of the analysis was largely on the qualitative content of the material and not on the intricacies of the discourses produced, these problems were deemed less important than the need for a common coding scheme and the possibility of comparison between sources of material.

4.5 Epistemological and ontological position

The ontological and epistemological position occupied in this thesis can be summarized in the concept of “situated knowledge”, common in feminist and intersectional research (Caretta 2014). The concept refers to the contingent, contextual and relational nature of knowledge production and involves a sharp critique of the positivist claims that the social world exists independently of our subjective interpretation of if (ibid., pp. 489-490). These assumptions are shared by critical phenomenological approaches to research (Kinkaid 2020, p. 174).

This position has several implications for the research process and analysis. Firstly, since we cannot know an “objective reality” apart from our own subjective experience of it, the aim of this thesis is not to provide a universally valid or

"objective" overview of all sexworkers' experiences. Rather, the aim is to contribute to a greater understanding of the vulnerabilities that sexworkers in Sweden and the Netherlands face and the strategies they use to resist or cope with these vulnerabilities through critically examining their own accounts of these experiences.
If we assume that reality is subjectively experienced and interpreted, it follows that the only way to understand it is through examining these experiences and interpretations.

Further, as knowledge is assumed to be culturally and historically constructed, it is also assumed that the experiences of sexworkers in Sweden and the Netherlands are not universal, which provides a rationale for the comparative aspect of this thesis. It also implicates that the research process, and the relationships involved in it, must be continuously reflected upon. Edwards (1990; cited in Caretta 2014, p. 490) argues that this reflection is key, in order to allow the voices and experiences of the participants to come through in the text. In this thesis, this is done through reflecting critically upon my own role as researcher in this process, but also on my own identity as a non-sexworker and socially privileged woman in academia, as elaborated below. It also affected the conduction of the interviews and the process of analysis. The interview questions were kept open-ended and the interview-style was receptive in order to let the interviewees speak freely and openly about their experiences, and the analysis was conducted carefully, double-checking quotations and interpretations with the interviewees throughout to ensure that their experiences were accurately represented in the final work. In sum, the ontological and epistemological positions that this thesis emanates from has implications for each part of the research process, from problem formulation and purpose, to methodology, theoretical framework, analysis and conclusion.

4.6 Positionality

As mentioned in the section on bracketing, it is important that I as the researcher am continuously reflecting upon my own role in shaping the research process. As a white, middle-class woman working within an academic contexts, my ability to speak

of the experiences of sexworkers is limited. The broader aim of this research is thus to use my privilege as a researcher to amplify the voices of others, and not to speak *for* them. However, I recognize that due to the lack of personal experience with sexwork, there are limits to what I can understand and capture about this topic.

Further, while this thesis raises what I strongly believe are important questions pertaining to how we understand the experiences of sexworkers, the ambition here is not to offer prescriptions for policy or solutions to decades-long debates. Due to the limited scope of this study, and the difficulties involved with data collection, it may actually raise more questions that it ultimately answers.

5. Operationalization

In the process of analysis, the theoretical framework and the data were in constant dialogue with each other. The key concepts that are used in the analysis were identified through reading through the transcripts of the interviews and identifying key themes and concepts. These were then connected to the theoretical framework and developed into superordinate concepts and themes that were used to structure the final analysis. The analysis itself is conducted using a critical phenomenological methodology, meaning it emanates from the interviewees' accounts of their experiences doing sexwork in Sweden and the Netherlands. A key aspect of the analysis also involves the practice of bracketing. Bracketing was done through continuously reflecting on my own role in the analysis, and how the analysis could be impacted by my preconceptions and attitudes towards sexwork, through keeping a reflexive diary of my thoughts and reflections throughout the analysis. Further, due to the interpretive nature of phenomenological analysis, I as the researcher needed to have an awareness of context, culture and language during the analysis, which also required extensive reflection (Babones 2016, p. 461).

Once the interviews were conducted, they were transcribed verbatim in a detailed and accurate manner. This was done by hand to fully capture the nuances of the interviewees' testimonies, and to avoid any errors that may come as a result of

automated transcription. Following transcription, the material was read through several times in order to increase familiarity with the texts and to get a better understanding of some of the themes and key concepts in each interview.

The process of marking key concepts and themes in the transcripts was done by hand and in several rounds, in order to ensure attention to detail and the full nuances and complexities that arose in the data. The process of analysis began with printing out the transcripts and reading them through several times in order to ensure familiarity with the data. A preliminary list of concepts and themes that emerged from the data was compiled. After, a table of key themes and concepts was compiled, using the preliminary list from the data and the theoretical framework. The themes and concepts were operationalized in ways that would make them straightforward to identify in the transcript. For example, interviewees' expressions of feeling invisible, ignored or alienated was marked as "abjection". As such, the key themes and concepts were allowed to emerge from the transcripts, but were defined and developed using the theoretical framework. Each theme or concept was assigned a different color. The transcripts were read through several times more, marking the concepts and themes in the texts using different colored markers. Finally, all the themes and concepts were compiled and organized in a document, and quotations or accounts of experiences that were indicative or related to the themes were collected. This resulted in a document with the key themes and concepts and their associated quotations or accounts from the interviews.

These steps were completed for all of the transcripts, and the entire process was done two times to ensure consistency and clarity. In a separate document, it was noted down when the interviewees' expressed very similar ideas or experiences, in order to allow for comparison between the experiences of the interviewees' in the Netherlands and Sweden. For instance, the interviewees' expressions of "agency" were compared in order to examine similarities and differences between the two contexts regarding how agency was exercised and expressed. Here, the theoretical framework was engaged in order to gain a fuller understanding of why these similarities and

differences arose, and what implications this had for my findings. As the goal was to go beyond a simple recounting of what the interviewees had said, this dialogue with the theoretical framework was crucial.

In appendix B is attached a table with the themes/concepts and the operationalization of these used in the analysis.

After themes and concepts were identified, the interpretive process began. The aim of this phase was to develop and emphasize the unique experiences of each interviewee, and to do this in as much detail and as accurately as possible. Keeping in mind the hermeneutic and subjectivist foundations of critical phenomenology, the aim was not to objectively recount the experiences of the interviewees, but rather to critically interpret them in relation to the theoretical framework.

Lastly, the findings from the analysis were written up. This was done through using verbatim quotes and recollections from the interviewees to illustrate the key concepts and themes, and connecting them to the broader theoretical framework. The superordinate themes of vulnerability and resistance here provide the organizing framework for the analysis, with the concepts of abjection, stigmatization and agency providing more depth and detail to the analysis.

6. Analysis

In appendix C is attached an overview of the interviewees.

6.1 Vulnerability

The interviewees all expressed experiences of vulnerability. The interviewees in Sweden as well as the Netherlands all seemed to emphasize that it was not necessarily the nature of their work that made them vulnerable, but rather argued that it was the regulation of sexwork in their respective countries that rendered them vulnerable in different ways.

6.1.1 Lack of agency

The interviewees in the Netherlands emphasized that they felt a lack of agency due to the laws and regulations around sexwork in the Netherlands. Either, it was due to the fact that aspects of their work were too tightly regulated, not allowing them the freedom and choice that they wanted in deciding when, where and how to work, or it was because of a lack of effective regulation, allowing for labor exploitation of sexworkers. As for the first aspect, both interviewees spoke about the "chain of bureaucracy" that potential sexworkers have to go through before being allowed to work, and about the difficulty in keeping up with quickly changing laws and regulations around sexwork. Dealing with the bureaucracy and lacking knowledge or understanding of one's legal rights and obligations when it comes to sexwork was emphasized by both interviewees as sources of vulnerability, especially since many sexworkers instead choose to work unregulated (illegally) in order to avoid the long and costly process of registration.

> Is it right, is it the proper way [to work unregistered], no, but not all of us can afford it time-wise. Also financially, because all of these registrations cost a lot of money as well. A lot of us come here with nothing, and we do sexwork for a while to get some money, which will buy us some time to think about what we want to do next. (...) Sometimes we just need to make money to pay rent, to pay off debt, to just be able to start. (Interviewee Two).

Working unregistered is associated with a range of vulnerabilities, including being financially reliant on a third party, risking criminal charges, or, if the sexworker happens to be a migrant, deportation, but it seems to be the only viable option for many sexworkers who cannot work in the legal circuit. Further, without the oversight of the legal sector, the illegal sector is associated with far more violence and labor exploitation (Interviewee Two).

Both interviewees working in the Netherlands also mentioned that, despite the presence of extensive regulation of the sex industry, labor exploitation is still rampant in some sectors. For instance, sexworkers are not allowed to work as independent escorts, but rather have to go through established and licenced escorting agencies.

However, these agencies can (and do), according to the interviewees, take a disproportionate share of the sexworkers' income. This is because the agencies pay the sexworkers' taxes, but they also take out an "arrangement" fee, which can run very high depending on the agency. Further, the interviewees also pointed out that most sexworkers do not want to report the agency to the authorities, because of the likelihood that the authorities will simply close that agency, leading to fewer job opportunities for escorts (Interviewee One) This indicates that the sexworkers' lack of agency in choosing how they work, and also their lack of agency when it comes to speaking out against unfair working conditions. This may be even more pronounced for those sexworkers who are financially reliant on sexwork, who cannot risk reporting their agencies to the authorities in fear of losing their only source of income. As such, sexworkers who are already financially vulnerable may become even more so through being trapped in unfair working agreements with agencies.

Both interviewees also mentioned the gentrification of historically red light districts in the Netherlands. Interviewee Two spoke at length about the "erotic center" that is being built, meant to "move" the red light district from De Wallen to a southern suburb of Amsterdam. According to her, this is part of an explicit political agenda to "clean up" the neighborhood, and to turn it into a luxurious shopping or residential area. Not only does this threaten the incomes and livelihoods of the sexworkers who have always lived and worked in the red light district, and for whom the district provides a degree of safety and security, as well as a form of "organic marketing" of their services, but it may also lead to some sexworkers being prioritized over others, based on origin, race, gender or age: "my general prediction is that the city will prioritize young, cis, white sexworkers, as they are also often the most flexible" (Interviewee Two)

As such, sexworkers who do not conform to the cis, white, young ideal arguably experience layered vulnerability as a result of the gentrification: they lose their working spaces and sources of income in the red light district, and have to work

much harder to gain a space in the new erotic center because they are not deemed as "desirable" as their cis, white counterparts.

These two examples indicate that the lack of effective regulation of working conditions, and the overextension of state power in deciding where, when and how sexworkers can work is negatively affecting the sexworkers' agency. They repeatedly express that they often feel they have little power in deciding for themselves how and where to work, and become subject to exploitative and unfair working conditions. It was also indicated that non-white, trans/queer and older sexworkers are especially vulnerable in these conditions, as they are deprioritized when the government decides which sexworkers get opportunities to work. Socioeconomic status was also mentioned as a key source of vulnerability, and as something that greatly impacted sexworkers' agency. Working as a registered sexworker was described as being a time-consuming and expensive process, which essentially forces sexworkers who cannot afford to go through it to work in the illegal sex sector, where they are vulnerable to far more exploitative working conditions and potential criminal charges. As such, some sexworkers experience layered vulnerabilities due to their race, origin, age, gender identity or class.

This sentiment was echoed by some of the Swedish interviewees. In Sweden, all sexwork is de facto unregulated, as it is not a legal industry. All of the interviewees in Sweden expressed a dislike for the existing regulation around sexwork (or "prostitution" as it is legally termed).

The sex purchase law (*sexköpslagen*) was discussed extensively by the interviewees, and can in several ways be connected to their experiences of vulnerability. Interviewees Three and Five both argued that despite it being legal to sell sexual services, the seller is actually in a much more unsafe situation than the buyer. The buyer, if caught, only runs the risk of getting a small fine for the crime, but the seller potentially risks their safety or even their life. Interviewee Three argued that, because the buyer is "already doing something illegal", they may be more prone to crossing

further boundaries, and because they are anonymous, they believe they cannot be caught.

Here, too, a lack of agency could be identified: Sexworkers are also often hesitant to report "bad customers" to the police, for several reasons. Firstly, they risk losing their customers and as such their source of income. Two out of the three interviewees in Sweden had other jobs outside of sexwork, but not all sexworkers do. For those sexworkers that rely on sexwork, or that have financial difficulties, reporting their customers to the police would mean losing their only source of income (Interviewee Four). Secondly, because selling sexual services is not illegal in Sweden, the sexworkers are not awarded the status of plaintiff in trial. Rather, they are witnesses. Witness testimonials cannot be anonymous in Sweden, which means that the full name and personal information of the sexworker becomes public information if the case goes to trial, threatening their personal safety and integrity (Interviewee Three; interviewee Four). Thirdly, becoming involved in a trial against a customer means that the sexworker has to reveal themselves to be a sexworker, which for sexworkers who have partners and/or children can be very risky. Two of the sexworkers in Sweden had children of their own, and spoke extensively about their fears that their children would be taken away from them by the social services, as sexworkers are not seen to be fit as parents (Interviewee Four; Interviewee Five). Fourthly, similarly to in the Netherlands, migrant sexworkers risk immediate deportation if they are found out, as sexwork is not seen as an acceptable or legitimate profession[9] (Interviewee Four)

As such, the sex purchase law can be seen as actually causing sexworkers to be more vulnerable at the hands of customers, potentially having to risk their lives or personal security. Further, it is assumed in the law that all sexworkers have an interest in reporting bad clients, while in reality it seems that sexworkers' situations and

[9] At the moment, prostitution in itself is not enough to lead to deportation in Sweden, though the issue is currently under debate in the Riksdag following a proposal in Tidöavtalet (Interpellation 2022/23:36). However, a person can be deported or refused entry into the country if it is suspected that he or she will not support himself or herself by honest means (Swedish Aliens Act, 2005)

preconditions are very different. Sexworkers who are economically reliant on sexwork, sexworkers with children or migrant sexworkers may not have this incentive to report bad clients, because it means that they have to risk their livelihoods or their families. These already vulnerable individuals are thus rendered even more vulnerable to violence or abuse at the hands of clients, or may be forced to accept offers that they are not comfortable with, further limiting their agency in deciding how they work.

6.1.2 Abjection

The interviewees in both Sweden and the Netherlands expressed experiences of being seen as "disgusting" or "dirty", or as not being seen at all, deemed as "out of bounds" for both policymakers and the general public. Several of the interviewees, both working in Sweden and in the Netherlands, expressed that people often had "visceral reactions" to their work, reflecting a perception among the public that sexwork is not "normal" or "acceptable" in legitimate society (Interviewee One; interviewee Four). The interviewees also expressed frustration over "not being heard/seen" as a result of this abjection, feeling that their political demands were not respected or their needs taken seriously. This arguably contributes to the vulnerability of sexworkers, as they are not able to get their needs or demands met. For example, interviewee Two expressed great frustration over the proposed erotic center in Amsterdam, arguing that "the location and the whole idea of the erotic center is not compatible with how sexworkers make money, so it's really clear that nobody bothered to check whether this is actually good business wise for sexworkers" (Interviewee Two).

The erotic center is presented by the interviewee as threatening the livelihoods of sexworkers in the red light district, and as something that was implemented entirely without regard for these sexworkers, despite the fact that the center is supposedly meant to improve the sexworkers' situation (Interviewee Two). As such, the erotic center is seen as potentially leading to more financial vulnerability for sexworkers in Amsterdam, something that is not taken into account by policymakers. Further, this vulnerability would be exacerbated for those sexworkers who did not conform to the

young, cis, white ideal, who would be quite literally be made invisible through being denied work in the erotic center.

Similar experiences were expressed by the Swedish interviewees. As was pointed out by interviewee Four and Five, the concept of "sexwork" does not legally exist in Sweden. It is believed that selling sexual services is something that is only done out of desperation, or at the hands of a third party. Those that do sexwork "consensually" i.e. not at the hands of a third party nor out of desperation, are thus not visible socially or politically. Interviewee Four and Five both expressed that they felt sexworkers were only rarely given space in politics or the media, and when they were, they were often represented as not intelligent or mentally sane enough to truly understand the exploitative nature of their own situation.

> Basically you're not seen as a full citizen, you don't know your own good, and even if… There have been some interviews with sexworkers from Red Umbrella before, but there is always someone who, at the end of the interview, has to say "this is not possible" or "she's probably mentally ill (Interviewee Five).

Perhaps paradoxically, the only governmental agency in Sweden that seems familiar with the idea that sexwork could be a legitimate source of income is the tax agency. Legally, sexworkers have to pay taxes on their income from sexwork, despite the fact that it is not seen as a legal profession. Interviewee Three expressed it as

> You are supposed to pay taxes for sexual services, but you get no security back. I can't make deductions for travels, clothing, hotel stays, anything, but I still have to pay taxes because someone else is committing a crime. Isn't that strange?

Because "consensual" sexworkers (i.e. those who do it out of their own free will) are not seen as even existing in Sweden, those sexworkers are arguably rendered abject and prevented from expressing their very real needs, such as being able to make tax deductions on work-related expenses. The existence of consensual sexworkers is consistently overshadowed by the view of sexwork as inherently exploitative, and of all sexworkers as victims. These views are not only set down in the law, but are also,

according to the interviewees, the dominant views of most politicians and policymakers (Interviewee Four; Five). The interviewees also repeatedly expressed that all they wanted was to have the same rights and possibilities as everyone else. However, the low status of sexwork in Sweden, and its associations with exploitation and criminality, effectively separates sexworkers from "legitimate society" and thus renders their needs and demands invisible (ibid.).

Something that was emphasized by interviewees in both Sweden and the Netherlands was that certain sexworkers were especially "invisible" and vulnerable.

> The narrative is always on female sexworkers, and never on male sexworkers who are subject to way more violence. (…) And trans sexworkers are even more likely to be subject to violence, but policymakers are not interested in male or trans women sexworkers, and there is *no* research being done on trans men sexworkers. So it's interesting too where the narrative lies, of who is considered vulnerable (Interviewee One).

In both contexts, it was emphasized that identifying as trans, queer or male as a sexworker rendered you much more vulnerable, both to violence but also socially and financially. Trans and queer sexworkers have additional expenses in the shape of hormonal therapy or medications such as PrEP[10], that put them in a more financially vulnerable position, at times having to accept clients or offers that put them in danger (Interviewee Two). Male sexworkers are also subject to additional stigmatization and expectations related to ideals of masculinity. According to the interviewees, these sexworkers were rarely seen or heard in political spaces or the media, and they were rarely included in research (Interviewee One; Four). This may be especially pronounced in Sweden, where the rationale for the sex purchase law itself is explicitly tied to men's violence against women. As such, sexworkers are all seen as cis women, and almost always as victims at the hands of men. Sexworkers who are male or trans are thus rendered abject, partly because of their status as sexworkers, but even more so because of their additional identities as trans or male. This also

[10] PrEP, or pre-exposure prophylaxis, is medicine people at risk for HIV take to prevent getting HIV from sex or injection drug use (HIV.GOV, n.d.).

involves an additional layer of vulnerability, not only because male and trans sexworkers are subject to higher rates of violence and abuse than their cis, female counterparts, but also because there is no acknowledgement or knowledge of their vulnerability in the first place. Political demands can not be formulated nor met if those formulating them are not even visible.

6.1.3 Stigma

Interviewee One, working and living in the Netherlands, argued that "the representations are the same but how they are expressed is different to other places" , suggesting that stigmatization of sexworkers is present in the Netherlands, but may be less extreme depending on the circumstances. In both Sweden and the Netherlands, interviewees mentioned that sexwork tended to be associated with drug use, mental illness and criminality, though this is not a reflection of reality: "I think there is often this image of sexworkers being drug addicts (...) even though there are not the same reasons for drug use here as there are in other social contexts" (Interviewee One)

> When I told a counselor at my old school, she wanted me to do a drug-test out of nowhere. I don't think that would have happened if I hadn't told her. Those things are always kind of lumped together (Interviewee Three).

> As a sector, sexwork, or it's called prostitution and human trafficking, is managed by the ministry of justice [in the Netherlands], and not by the ministry of work and pensions, so it's not seen as a career from the outset, it's seen as a criminal enterprise (Interviewee One)

This suggests that stigmatization of sexworkers is present in both countries, and is experienced in similar ways. However, the interviewees in the Netherlands expressed that, though it was far from universally accepted, sexwork was to some extent still seen as "work". Interviewee One also explained that in some areas, especially around the red light district, sexwork was normalized to the extent that she did not have to worry about telling e.g. the florist or a vendor that she was a sexworker. On the flip side, certain parts of the Netherlands that are traditionally religious were almost like

“no tolerance zones” for sexworkers, suggesting that stigmatization of sexworkers in the Netherlands is highly localized or regional.

The experiences of the sexworkers in Sweden, however, suggests that stigmatization is perpetrated at a much higher level, likely due to the semi-legal nature of sexwork and its close associations with criminality, addiction and exploitation. The lack of legal regulation around sexwork as a profession also makes Swedish sexworkers more vulnerable to discrimination as a result of this stigma. For instance, interviewee Four mentioned that when the people in her town found out that she was a sexworker, she was fired from her job as a cashier because the owner of the store “didn’t want someone who did that kind of thing representing the store”. Similarly, the interviewees with children expressed fears that the social services would take their children away from them, as sexworkers are seen as “bad parents” (Interviewee Four; interviewee Five). In both of these cases, the stigma is not only highly present, but also has very real effects on the interviewees’ lives. In the first case, it had the effect of making the interviewee more financially vulnerable, as the stigma around sexwork prevented her from getting another job to support herself and her family (Interviewee Four). In the second case, the stigma adversely affected the interviewee’s mental wellbeing, as she was to be constantly worried that she would be “outed” as a sexworker and her children taken away from her (Interviewee Five).

6.2 Resistance

6.2.1 Agency: Self-definition and choice

Several tactics or strategies of resistance could be identified during the interviews. All interviewees showed signs of self-definition, rejecting not only the stereotypes and stigmatizations that affected them, but also tended to question the very authority of those upholding these stereotypes and stigmatizations. This was in many cases done through humor, through emphasizing the absurdity or preposterousness of certain claims.

> There's also this idea of the rich sexworker that is diving into money and Louis Vuitton bags, which yeah, I mean it makes people go like "those girls have no morals and would sell their mothers if they could" and to this I say: some mothers are really horrible (laughs) (Interviewee Two)

In other cases, it was done through undermining the authority of those seen as upholding or perpetuating these harmful stereotypes and stigmatizations, for instance through questioning their professionalism, honesty or even intelligence: "I think that's very telling, you know, if you [politicians] can't even be in physical proximity with me because you fear associating with sexworkers, then you probably shouldn't be in politics at all" (Interviewee One)

It was also done through problematizing notions of choice and consent. Several of the interviewees, both in Sweden and in the Netherlands, emphasized that they had actively chosen to do sexwork, even faced with other options (Interviewee One; interviewee Three; interviewee Four). As such, sexwork was not something that they were doing out of desperation or because someone else was forcing them, but rather because it allowed them more flexible schedules and extra money to spend. Several interviewees further pointed out that sexwork may in fact be less exploitative in some cases than other jobs or industries that are also affected by issues like trafficking and labor exploitation.

> There are other sectors in the Netherlands that are subject to trafficking or forced labor more than sexwork, but there are not the same procedures being put in place for e.g. agricultural workers, for domestic or hospitality workers (...) because there is not such moralistic demand being put on them as there is with sexwork (Interviewee One).

> I felt really exploited at my "normal" job at the factory, I felt burned out and I never had the time for anything else… With sexwork I could choose when I wanted to work, what I wanted to do and everything (...) It allowed me to have more time with my children (Interviewee Four).

The interviewees in both Sweden and the Netherlands also tended to emphasize that, rather than victims or criminals, they should be seen as legitimate workers, as entrepreneurs (Interviewee One, Two, Three, Four, Five). This claim essentially flips

the dominant narrative about sexworkers on its head, indicating that sexworkers see themselves as highly agentic and independent.

6.2.2 Community and political organization

All of the interviewees, through their membership in sexworker organizations, were to some extent exercising resistance through political organization. However, this was more prominent for the interviewees in the Netherlands than for those in Sweden, likely due to the heightened need for Swedish sexworkers to remain entirely anonymous. All of the Swedish interviewees mentioned a reluctance to "come out" publicly as a sexworker due to the possible implications: their partners being investigated for pandering, having to face severe stigmatization, losing their customers and source of income, losing custody over their children, etc (Interviewees Three, Four, Five). Openly being sexworkers in the context of activism is thus arguably easier for sexworkers in the Netherlands, since they do not face the same legal barriers nor, arguably, the same level of stigma.

Both the interviewees in Sweden and in the Netherlands, however, emphasized that their communities were very important to them, both for providing sources of support and understanding during challenging times, but also for another key reason. The sexworkers in both the Netherlands and in Sweden had developed specific measures to signal to each other about bad clients. In the Netherlands, this measure was referred to as "ugly mugs"[11] (Interviewee One), and amongst the Swedish interviewees, it took the shape of a shared list of names and aliases (Interviewee Three; interviewee Four). Not only do these measures serve to fulfill a need amongst the sexworkers, helping each other avoid bad clients, but they are also an important strategy of resistance. When the state or the police fail to protect and support sexworkers, they find ways to do it themselves, demonstrating a high degree of solidarity with each other, often in spite of measures to prevent this. In Sweden, for instance, the pandering law greatly limits the extent to which sexworkers can

[11] Ugly Mugs NL (UMNL) is an online platform for safer sexwork. On this platform, sexworkers can warn each other about aggressive and dangerous clients.

communicate with and help each other, as it could be interpreted as “encouraging” someone else to sell sexual services. However, through updating this list of “bad clients”, the sexworkers nonetheless find ways to share crucial information amongst themselves, effectively resisting the law’s attempt to limit how they communicate with each other. As interviewee Three explained: “This list actually provides us with more security than the police do” .

In sum, having community was found to be a key part of resistance amongst sexworkers in both Sweden and the Netherlands. For some, it means organizing or participating in large-scale demonstrations or speaking with policymakers and the media, and for some, it means sharing crucial information with each other in creative ways, and supporting each other through tough times.

The interviews also revealed the intersectional impact of the sexworkers’ positionality on access to political organization, sexworker communities and support networks. Interviewee Two pointed out that “it's important to understand that to fight for a certain cause, it's kind of a luxury, not everyone has time, resources, energy and health to be activists”.

Sexworkers who are single parents, who have health issues or who are migrants and are afraid of being deported or prevented from working if they “come out” as sexworkers are less likely to engage in political action, not only because they may have less time, energy and resources to do so, but also because they have more to lose: “engaging myself is probably not going to happen, since I have to keep it [sexwork] a secret, considering my children” (Interviewee Five).

Further, interviewee Two argued that, while her status as a queer woman rendered her more vulnerable in some aspects, and more prone to stigmatization, she still considered herself as highly privileged due to her whiteness and access to knowledge and community: “I wouldn’t describe myself as the least privileged because I’m still white, and I had access to knowledge and community early on in my sexworking

experience, so that was something that made me very privileged compared to others".

This aspect of privilege was echoed by several of the other interviewees, both in Sweden and the Netherlands. Aspects like whiteness, being cis, and being educated/of a higher socioeconomic status were all mentioned as factors that had made the interviewees *less* vulnerable than other sexworkers (Interviewee One; interviewee Two; interviewee Four). On the flip side, factors such as migrant status, or lower socioeconomic status (financial vulnerability) could negatively impact sexworkers' access to support networks and sexworker communities, as they may not have the resources or information needed to seek out these communities. Further, as mentioned, sexworkers of color or trans sexworkers are subject to far more vulnerability in terms of violence and discrimination, less working opportunities, stigma and financial difficulties. These aspects also affect their access to support networks and communities, and the likelihood of engaging in political action such as demonstrations or protests. As such, the ability of sexworkers to engage in communities and political resistance is arguably highly variable and dependent on factors such as race, class, origin and sexual identity.

7. Conclusion and discussion

Through analyzing the data from the interviews using the theoretical framework, several findings became clear.

In both Sweden and the Netherlands, the sexworkers experienced several, often layered, dimensions of vulnerability. In both cases, most of the interviewees felt that this vulnerability was a direct or indirect result of the legislation around sexwork in their respective countries. In the Netherlands, the interviewees' vulnerability was associated primarily with the experience of a lack of agency in deciding where, how and when to work. Further, it became evident that the government's idea of who was vulnerable and why did not necessarily correspond to who was actually vulnerable. In

Sweden, the interviewees also argued that aspects of the existing legislation around sexwork in Sweden made them more vulnerable. The Pandering Law explicitly prevented them from communicating with and helping each other, and made it much more difficult for them to have partners and families. Further, the Sex Purchase Law had the perhaps unintended effect of pushing sexworkers to accept more dangerous clients, and put them in an economically vulnerable position as they have to rely on cash.

When it came to the themes of abjection and stigma, the interviewees in both countries expressed similar experiences of not being heard, seen, taken seriously, or associated with criminality, addiction, mental illness or overall moral degeneracy, suggesting that despite the very different legal approaches to sexwork in Sweden and the Netherlands, it is not something that is widely accepted or normalized in either case. In both countries, the interviewees indicated that sexworkers who also possessed other marginalized identities, such as migrant status, being non-white, transgender, queer, financially unstable, a single parent were often even more vulnerable than those who did not possess these other identities. It was emphasized that these sexworkers faced an even greater lack of access to benchmarks of welfare such as economic stability, health care, community, and that they were more at risk of being exploited by third parties. It was also found that, while all sexworkers face stigma and are treated as abject by politicians, the media and even the public, trans, male or queer sexworkers have to face this to an even greater extent, due to the already existing stigma associated with those identities.

As for resistance and exercising agency, the interviewees in both countries utilized similar measures, such as finding community, organizing politically, but also through challenging stereotypes and negative judgements and finding small but meaningful ways to “decide for themselves” in their work. However, the political organization in the Netherlands was more developed and “open” than that in Sweden, likely due to the fact that sexwork is a recognized and legal profession. Interestingly, a key measure of resistance in both countries were found to be internal warning

mechanisms about dangerous and violent clients that were shared only among sexworkers. This illustrates not only an important aspect of community-building – sharing information with *only* other sexworkers – but also the key idea that sexworkers in both countries find ways to protect themselves when they feel that the state and the police fails to do so.

The findings from this study are in line with much previous research (for instance Sanders 2016, Benoit & Mellor 2023) that contextualize sexworkers' vulnerability in the social, political and economic structures that surround them. They are also in line with much of the research done in each country, which tends to criticize the existing legislation on the basis that it does not improve sexworkers' position. However, this thesis contributes and develops the discussion in some key ways. Firstly, through the comparison between the experiences of sexworkers in Sweden and the Netherlands, it becomes clear that in neither case are sexworkers free from vulnerability, abjection and stigma. As such, the findings effectively challenge the claims of researchers who claim that legalization would significantly improve the situation of sexworkers. The results of this study thus effectively illustrates the point that *it is not enough* to deal with the issue of sexwork solely through legal measures. Further, in both Sweden and the Netherlands it was found that there are certain sexworkers who are more vulnerable than others, indicating that there is a lack of sensitivity to how legal and political measures potentially affect different people differently. As evidenced by the results of this study, sexworkers are not a homogenous group, and policy around sexwork needs to be sensitive to this.

The findings of this study in relation to agency and resistance are also in line with previous research, for instance Hubbard 2019, and thus strengthen the point that, despite legal and political measures to control them, sexworkers find ways to resist or co-opt these measures. The fact that these measures exist arguably indicate that sexworkers do not feel seen, protected or cared for by the state, the social services or the police in each respective country. In sum, the existence of these measures indicate

we have a long way to go when it comes to reducing sexworkers' vulnerability and improving their position in society.

These results should however be interpreted carefully. As mentioned, the aim of this study was never to generalize the findings, or to interpret them as universally true for all sexworkers. This is especially true when considering that all the interviewees were members of sexworker organizations with the explicit political goal of decriminalization and/or legalization of sexwork. As such, there may be biases intrinsic to the sampling that further prevent any attempts at generalization or universalization of the results. Interpreting the findings as be-all, end-all answers to "the issue of sexwork" should also be avoided. As mentioned, this study may in fact raise more questions than it ultimately answers, however important these questions may be. It should be obvious from the background and previous research that sexwork and prostitution and incredibly complex phenomena, which require careful and sensitive governance. It is also important to consider my positionality as a researcher within this context, and that there are likely limits to what I can understand about sexwork as someone with no personal experience of it. As such, the results of this study should be seen as an important step on the way, and not the final destination.

Further, due the limited scope of this thesis, and the difficulties associated with conducting interview studies with members of marginalized communities, some very interesting points of analysis had to be deprioritized at the expense of others. Some aspects of the analysis would further benefit from more development had there been more space within the scope of the thesis. As such, limiting and specifying the analysis further, for instance through choosing less analytically expansive concepts for analysis, would perhaps have benefited the final work. It could also have been done through focusing exclusively on either vulnerability or resistance, in order to examine each more in detail. This is an important limitation of the study, and ought to be taken into account for future research.

Despite this, this study has contributed with knowledge about the specific vulnerabilities that sexworkers in Sweden and the Netherlands face, their use of resistance strategies and how these are impacted by intersecting identities, beliefs and backgrounds. Through critically applying concepts from the theoretical framework, it was made apparent that sexworkers' vulnerabilities are intimately tied to a complex web of power relations, institutions and political strategies. It is only through a greater understanding of these that we can seek an inclusive, just and productive approach to the issue of sexwork in both Sweden and the Netherlands.

In line with this, I want to emphasize the importance of an intersectional approach for future research, since it became obvious through this study that sexworkers are not a homogenous group, and that their other identities, backgrounds and experiences greatly impact how they are affected by law and policy, and what resources they have to exercise agency. For instance, it is important to conduct further studies exclusively on trans or male sexworkers, in both Sweden and the Netherlands, in order to bring a greater understanding of the specific vulnerabilities these sexworkers face, and how their identities as trans or male and as sexworkers interact and overlap. It would also be interesting to conduct further comparative studies, for instance between Sweden and its nordic neighbors. The Finnish legislation is similar to the Swedish one, through it attempts to separate "consensual" sexworkers from victims of trafficking through making it illegal only to purchase sexual services from victims of trafficking. It would be interesting to examine the differences and similarities in these legislative regimes further, and how they impact sexworkers lives and vulnerabilities.

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Appendix A

Interview guide

Your responses in this interview will be used as material in a thesis written in partial fulfillment of the requirements for the Master of Science programme "Political Science" at Lund University. After examination, the thesis will be published at "Lund University Publications Student Papers" and can be accessed at the publications website or through me. The purpose of this study is to contribute to a greater understanding of the diverse experiences of sexworkers living and working in Sweden and the Netherlands. The aim is to look at factors relating to national sex work policy, living and working conditions in each country, experiences of identity-related vulnerabilities, and representations of sexworkers in politics and the media as well as among the general public. This is in order to gain a holistic and nuanced understanding of the lived realities of the sexworkers interviewed. The interviewees include individuals such as yourself with experience of working within the sex industry in Sweden and the Netherlands. Following the interviews, the responses of the interviewees will be analyzed using a theoretical framework. The interviewees will be completely anonymous in the thesis, and no personal or sensitive details will be included. This will be done through omitting or changing your name, and leaving out any personal information about you or the persons you may talk about in your interview. The interview will be organized into four smaller parts, beginning with some introductory information and questions, and then moving on to questions relating to Policy, working and living conditions, Identity and vulnerabilities and lastly representations and stigma. Following the interview, you will have the opportunity to ask me any questions you may have before we wrap up, and I also want to emphasize that you can at any point stop the interview or ask me to skip questions if you feel uncomfortable. You are of course also welcome to contact me at any time after the interview if any questions or concerns arise.

Do you have any questions before we begin?

Introductory questions

- Could you tell me a little bit about yourself, things like age and gender identity (if you feel comfortable sharing this), where you are from, what kind(s) of sex work you are/ have been engaged in, if you are still active in sex work or not.
- Choosing yourself how specific you want to be, could you tell me a little bit about your general experiences in sex work? How did you come to work with it, and if you are still doing it – how long have you been doing it for? If you are not still doing it – how come you stopped?

Policy, working and living conditions

- What do you think about the policy around sexwork in the Netherlands?
- Do you feel as though your health, safety and civil rights are respected and protected in this policy?
- Are you able to make a living as a sexworker, i.e. do you make enough money to survive, do you have a safe place to live and work?
- How do you feel about the authorities that regulate the sex industry in the Netherlands, such as the social services, civil servants and the police?
- To what extent do you think that the social provisions/welfare set out for sex workers in the law are provided?
- Do you feel as though you have the power to influence political decisions and policy? Is your voice and the voices of others heard? Why?/Why not?
- Are there any aspects about the existing sex work policy that could be changed that would make you feel more safe, comfortable and protected, or do you feel that there is another approach that would be better? If so, could you expand a bit on this?

Identity-related factors, vulnerabilities

- Are there any specific factors about your life or your identity that you think that led you to pursue sex work? E.g. migrant status, economic difficulties, personal preferences, etc.
- To what extent do you think that your identity and background has affected your experience working as a sexworker? Are there aspects that have made you more vulnerable or more protected in your line of work?
- For you personally, what are the main benefits and drawbacks of doing sexwork?
- Have you ever felt as though you were either discriminated against or benefited in your work due to aspects of your identity– e.g. your background, your sexuality, demeanor, appearance etc.
- Have you experienced any obstacles in *other* areas of your life as a result of you working in sex work? (this could for instance be difficulties related to finding housing, getting bank loans, accessing welfare and social provisions, maintaining relationships, etc.)

If so – could you expand on this?

- Have you had any experiences where sex work has made your life easier? (this could for instance be achieving increased economic stability, the opportunity to be independent and having flexible working hours, etc.)

If so - could you expand on this?

- In what ways do you cope with, overcome or resist the negative aspects of your work?

Representations/stigma/abjection

- Do you feel that representations of sexwork and sexworkers in politics and the media are mostly positive or negative?
- Do you think that these representations affect the way sexworkers are viewed and treated, both by the general public but also by e.g. politicians and lawmakers?
- Have you ever experienced discrimination or harm as a result of these representations?

If you feel comfortable, could you expand on this a little?

- Do you feel as though these representations/stigmatizations have affected the way you think about and see yourself? If so – how?
- Do you feel as though there is space for other kinds of representations and depictions of sexwork in the media and general public? If so, what would these representations look like?
- Do you feel as though your voice can be and is being heard in the media and in public discussions? If yes – in what ways, if no- why not?

→ is there anything you'd like to add, anything else you would like me to know about your experiences?
→ do you have any questions for me?

Concluding remarks
Thank you so much for participating in this interview, and for giving me the opportunity to gain insight into your life and experiences. As mentioned, feel free to contact me at any point if you have questions or concerns, it is very important for me that you feel comfortable throughout this entire process. That concludes the interview, thank you again!

Appendix B

Key analytical concepts/themes and their operational definitions

Concept/theme	Operationalization
Abjection	Expressed as feelings/perceptions of invisibility/being ignored. Also involves the feeling/perceptions that others find them or their work in some way off-putting or even repulsive.
Stigmatization	Expressed as feelings/perceptions of not being able to live up to societal/other people's expectations/demands, feeling negatively judged by the surroundings.
Agency a. Self-definition b. Choice and consent	Refers to a) the rejection of stereotypes that serve to control and dehumanize, not only challenging the content of the stereotypes and categories, but also the authority of those establishing or perpetuating these stereotypes or stigmatization (self-definition), and b) emphasizing personal agency in "choosing" sexwork, and when, how and where to work (choice and consent).
Vulnerability	Expressed as a the loss or lack of access to benchmarks of welfare. Can be economic or political, but also social. Attention will also be given to expressions of "layered" vulnerability, i.e. several dimensions of vulnerability existing at once, and the connections between

	identity and vulnerability.
Resistance	The theme of resistance is expressed as strategies or practices used by to resist, co-opt, disrupt or challenge negative stereotypes, representations or even measures of control. It can be either individual practices or collective.

Appendix C

Overview of interviewees

Interviewee #	**Country of residence**	**Origin**	**Gender identity and sexuality**	**Active in sexwork**	**Types of sexwork**
Interviewee 1	Netherlands	Migrant	Female	3.5 years	Cam-by minute, online sexwork
Interviewee 2	Netherlands	Migrant	Female, queer	11 years	Escorting, pornography
Interviewee 3	Sweden	National	Female, heterosexual	5 years	Online sexwork (some), mainly full-service
Interviewee 4	Sweden	National	Female, queer	10 years	Online sexwork, Full-service
Interviewee 5	Sweden	National	Female, heterosexual	14 years	Full-service

Appendix D

Comparative study of the experiences of sexworkers in Sweden and the Netherlands

Consent to take part in research

I…… voluntarily agree to participate in this research study.

- I understand that even if I agree to participate now, I can withdraw at any time or refuse to answer any question without any consequences of any kind.
- I understand that I can withdraw permission to use data from my interview at any point before publication
- I have had the purpose and nature of the study explained to me and I have had the opportunity to ask questions about the study.
- I understand that participation involves answering questions about my experiences as a sexworker in the Netherlands, including questions about your perceptions of legislation and policy, your own identity and potential vulnerabilities and representations of sexworkers in the public eye and the media
- I agree to my interview being audio-recorded *and/or* that the researcher takes notes during the interview (please let me know which you are most comfortable with beforehand)
- I understand that all information I provide for this study will be treated confidentially.
- I understand that in any report on the results of this research my identity will remain anonymous. This will be done by changing or omitting my name and disguising any details of my interview which may reveal my identity or the identity of people I speak about.
- I understand that disguised extracts from my interview may be quoted in the final publication (if you would like I can double-check the quotes I want to use with you before publication)
- I understand that signed consent forms, notes and audio recordings will be retained until February 2024 (the date of publication). After this they will be permanently deleted.
- I understand that under freedom of information legalization I am entitled to access the information I have provided at any time while it is in storage as specified above.
- I understand that I am free to contact the researcher to seek further clarification and information.

Linnéa Falk
Lund University

Supervisor: Julie Hassing Nielsen, Associate Professor at Lund University

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Signature of participant and date

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Signature of researcher and date

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