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Nordic Contradictions in Sex Work Regulation: A Comparative Case  
Study of Sweden and Denmark

Author: Viviana Mihaela Nascu Vrincean

Supervisor: Terese Anving

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## Abstract

This research explores the contrasting legal and social frameworks surrounding sex work in the context of Sweden and Denmark, analysing their effects on sex workers' rights, safety and social inclusion. By drawing from a feminist perspective, the study engages in a comparative qualitative case through a discourse and thematic analysis. Data was collected via interviews with advocacy organizations and a review and analysis of policy documents.

In Sweden, through the Nordic Model, the criminalisation of the buyer reinforces state narratives of victimization and gender violence. Despite the fact that is intended to promote gender equality, this approach has been criticised for increasing stigma and displacing sex workers into more dangerous and invisible settings. On the contrary, Denmark's partial decriminalisation model recognizes sex work as legal work, however it fails to provide full labour protections, creating legal ambiguities that amplify precarity, especially for migrants. Both frameworks maintain a systemic exclusion through welfare, migration and criminal justice systems. Sweden enacts a symbolic governance where sex workers are victims in need of rescue, while Denmark treats them as legitimize workers yet limits their institutional support.

The findings reveal that regardless of the policy intention, sex workers continue to experience social marginalization, institutional discrimination and limited autonomy. The analysis underlines the need to move towards a rights-based, inclusive and harm-reductions oriented approaches that recognizes sex workers' complex and varied experiences. Ultimately, the study argues for the centrality of sex workers voices in shaping policy around them.

Keywords: sex work, Nordic Model, decriminalisation, policy regulation, Sweden, Denmark

## Popular Summary

Sex work is a topic that brings strong opinions and very different laws around the world. Some people see it as a job, other as a form of violence. This thesis looks at how two similar countries – Sweden and Denmark – deal with sex work in very different ways and what that mean for the people doing the work.

In Sweden, it is legal to sell sex, but illegal to buy it. This model is called the “Nordic Model” and is meant to fight gender inequality by punishing the buyers, not the sellers. It sounds good in theory, but in reality, it often makes life harder for sex workers. They still face police pressure, social stigma and find it harder to work safely. Particularly, migrant sex workers, are treated unfairly – they can be deported or denied housing and healthcare – even if they have not broken any laws.

Denmark takes a different approach. It allows buying and selling sex between adults, but still bans things like brothels or third-party involvement. On paper, sex work is legal and workers are expected to pay taxes. However, they do not get full labour rights and working together or hiring help can get them into legal trouble. As well, migrant sex workers – mostly from outside of EU – are not allowed to do sex work at all, so they risk deportation if found working.

This research is based on interviews with organizations that support sex workers and analysis of laws and public reports. The findings show that both systems fail to protect sex workers fully. Whether the law punished the buyer or tries to be more one, sex workers often feel unsafe, stigmatized and ignored in policy-making.

Lastly, the thesis argues that we need to listen to sex workers themselves. Real progress means protecting their rights, ensuring safety and treating sex work as work – not as a moral issue. Instead of punishing or “rescuing” them, policies should focus on harm reduction and inclusion.

## List of abbreviations

ESWA	European Sex Workers Rights Alliance
EU	European Union
EWL	European Women's Lobby
NGO	Non-Governmental Organization
RUS	Red Umbrella Sweden
SIO	Sexarbejdernes Interesse Organisation
UN	United Nations
CAP	Coalition for the Abolition of Prostitution
WAVE	Women Against Violence Europe
WHO	World Health Organization

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## 1. Introduction

Sex work is an issue which brings out many debates in many countries. Some people see it as a matter of personal choice and work, while others see it as a form of exploitation and violence (Farley, 2006; Gerassi, 2015; Hughes, 2010; Weitzer, 2010). Because of these different perceptions, countries have created very different laws and rules regarding sex work. Sweden and Denmark are two examples (Crowhurst, Outshoorn & Skilbrei, 2012; Wagenaar & Jahnsen, 2018). Despite sharing many similarities – such as being Nordic welfare states with significant gender equality policies and comparable social and cultural structures – their legislation approach to sex work is drastically different (Skilbrei & Holmström, 2013; Levy & Jakobsson, 2014). This difference offers a valuable opportunity to investigate how policy frameworks shape the social experiences and legal realities of sex worker lives in similar social environments (Danna, 2012; Månsson, 2017; Vuolajärvi, 2019).

On one hand, Sweden has what is known as the “Nordic Model”, where selling sex is not illegal but the purchase of sex is. The idea is to reduce demand for sex work and enable women to get out of the industry. Sweden's model has been frequently used as an illustration of feminist abolitionism, which seeks to reduce and eventually end sex work through the reduction of demand (Ekberg, 2004; Florin, 2012; Kulick, 2003; Levy, 2014; Månsson, 2017; Vuolajärvi, 2019). On the other hand, Denmark uses a partial decriminalization which allows the buy and sale of sex between adults, but there are still regulations about where and how it can be done. Denmark's policy model applies a pragmatic approach that treats sex work as a legitimate activity while still enforcing certain restrictions (Bjønness, 2012; Groes, 2022; Karlsson, 2023; Stormhøj et al., 2015).

Therefore, by comparing these two systems, this study will aim to compare Sweden's and Denmark's approaches to sex work regulation, by focusing on their effects on sex workers' legal rights and social experiences. By examining the effects of different legal systems on safety; social inclusion and access to rights; and how public debates, discourses and feminist ideas on sex work influence both the design of policies and the way sex workers are seen in society; the research seeks to get insight into how different measures can either protect or harm sex workers regardless of the legal status (Jakobsson & Jonsson, 2017; Weitzer, 2018).

This research also looks at how organizations working in the field, both those that represent sex workers and those that focus on broader issues like gender equality or trafficking,

understand and respond to the challenges created by current policies. Based on these aims, the following research questions guide the study: 1) How do the policy frameworks in Sweden and Denmark influence sex workers' access to safety, legal protections and social inclusion? 2) How do organizations perceive the effects of current laws and policies on the people involved in sex work? And 3) How do the representation in discourse affect public attitudes and social stigma towards sex workers in each country?

### Terminology

As for the terminology used in this research, the term *sex work* – coined by sex worker and activist Carol Leigh in 1978 – is used to describe adult and consensual exchange of sexual services for financial or material compensation (Pheterson, 1993; Rekart, 2005; Sanders, 2005; Smith & Mac, 2018). This choice of this term is based on its widespread use in academic literature and among many advocacy organizations as a, generally considered, more neutral (Pheterson, 1993; Rekart, 2005; Sanders, 2005); it emphasizes the idea that people who sell sexual services are performing labour. While the term *prostitution* has historically carried strong moral and legal connotations that can influence the perceptions of the individuals involved (Gerassi, 2015; Goffman, 1963). Thus, using *sex work* allows for a focus on the broader legal frameworks, rights and social conditions shaping the lives of those involved, rather than framing them solely through a criminal or moral lens.

This research also distinguishes between sex work and sex trafficking. According to the United Nations (UN) Palermo Protocol, sex trafficking involves coercion, force or deception for the purpose of sexual exploitation, thus trafficking is a human rights violation and involves the absence of consent. Sex work, by contrast and as mentioned above, is a consensual act between adults (Cho et al., 2013; Wilson et al., 2015). However, exploitation can occur – whether in legal or illegal labour contexts – including sex work, but not all sex work is exploitative by definition. As with other forms of labour, exploitation must be assessed based on working conditions, access to protections and consent.

Ultimately, there are different ways of regulation of sex work, depending on the country, so understanding the legal model in use will be essential to evaluate its impact. Although, this research focuses on two of them (Swedish/Nordic Model and partial decriminalization), it is important to briefly outline the other legal frameworks that exist globally (Smith & Mac, 2018): 1) criminalisation, all parties involved in the exchange of sex for money (sex workers, clients,

third parties) are criminalized; 2) partial criminalisation, some aspects are legal while others are criminalised – contrary from partial decriminalisation as it removes criminal penalties for acts of selling and buying sex but there are prohibitions on third-party involvements; 3) legalisation, sex work is legal but is regulated under strict conditions (i.e., medical checks, registration, designated areas); and 4) full decriminalisation, all consensual sex work-related activities are removed from the criminal law (sex workers, clients and third parties are not prosecuted) and sex work is treated as any other form of labour.

At the same time, is important to acknowledge that because language in this field is deeply political and varies across contexts and perspectives, the study respects the original terminology used by each interview participants, when quoting them directly, in order to respect their framing and voice. As well as in the different documents analysed and reviewed (DeVault & Gross, 2014; Sixtensson, 2021).

## **2. Contextual background**

Historically, sex work was treated as a marginal issue. Matthews (2008) argues that from the 1950s to the 1980s, a period of time also examined by Sanders (2005), it remained largely out of sight and confined to red-light districts. Nonetheless, political concern emerged in the late 1980s due to the AIDS epidemic, anti-drug initiatives, trafficking and increasing visibility of foreign women in the trade (Matthews, 2008:12-13). Outshoorn (2004) adds that the definitions of sex work reflect societal gender roles and public policies emerge from debates about morality, law and gender equality. These discourse constructions vary across states, shaping national policy regimes, as illustrated by Crowhurst et al., (2012) and Jones (2002), who emphasizes how local socio-political contexts, cultural narratives and institutions arrangements influence the framing and governance of sex work; which results in regulation, decriminalisation, prohibition or legalisation (Outshoorn, 2004; Wagenaar & Jahnse, 2018).

Sweden and Denmark, both part of the Nordic region and often seen as progressive welfare states have adopted significantly different legal approaches to sex work. These divergent models – Sweden’s criminalization of the purchase of sex and Denmark’s partial decriminalization – reflect how distinct ideological foundations continue to shape the rights, social attitudes and safety of sex workers within their borders (Danna, 2012; Karlsson, 2023; Vuolajärvi, 2019). While Sweden frames sex work as primarily a form of gendered violence and moral harm (Ekberg, 2004; Florin, 2012; Levy & Jakobsson, 2014); Denmark’s approach

is more pragmatic by making legal the sell and buy of sexual services between consensual adults, but still regulating third-party facilitation (Bjønness, 2012; Groes, 2022; Stormhøj et al., 2015). To better understand how national ideology and legal design shape the lived realities of sex workers, the following sections presents the Swedish and Danish contexts.

#### **a. Sweden – The “Nordic Model”**

Historically, Sweden’s policy evolved at the same time as broader changes in welfare and gender governance and its approach to sex work has been shaped by a strong national commitment to gender equality. The country’s policy model – referred as the “Swedish Model” or “Nordic Model” – is gathered in the Sex Purchase Act (*Sexköpslagen*) and was passed under the *Kvinnofrid* (Women’s Peace) legislative package in 1999, which criminalized the purchase of sexual services but not the sale.

The policy was justified as a feminist-humanitarian approach to combat male violence against women and challenge the commodification of female bodies (Levy & Jakobsson, 2014:594). The law views sex work as inherently violent and patriarchal, aligning with radical feminist perspectives that conceptualize sex work as incompatible with gender equality (Ekberg, 2004; Farley, 2006). Symbolically and practically, the law was designed to reduce demand for sex work by penalizing clients and asserting that women are not commodities to be bought.

Nonetheless, the modern turn toward a client criminalization marked a critical shift in how state conceptualized sex work – not as a public nuisance or hygiene issue, but as a manifestation of gender inequality and violence. This reorientation can be visible in the official rhetoric that accompanied the 1999 law, where sex work is not presented as labour but as inherently degrading and incompatible with Sweden’s vision of sexual equality (Ekberg, 2004). Månsson (2017) argue that the policy constructs a simplistic binary between victims and perpetrators, overlooking the complexities of individual agency and the social context in the sex trade. Other scholars argue that the model reinforces victimizing discourse around sex work, portraying all women involved as passive and traumatized (Farley, 2004; Jonsson, 2023; Levy & Jakobsson, 2014). This discourse informs restrictive social policies that seek to eradicate rather the regulate or support sex work.

While the policy has been internationally celebrated – mostly by feminist and anti-trafficking organizations – empirical data shows mixed results. Despite the fact that street-based sex work declined initially, studies suggest that sex work shifted to less visible, more online and indoors venues (Levy & Jakobsson, 2014:597). The displacement effect complicates data collection

and potentially increases risks for sex workers by limiting their access to services and safety networks (Sanders & Soothill, 2011). As Jakobsson & Kotsadam (2014) point out, the shift to criminalizing client has pushed sex work further underground, making it harder for social services providers to reach workers and for sex workers to assess clients.

Vuolajärvi (2019) introduces the concept of “punitivist humanitarianism” to describe how the model governs through care while simultaneously punish, especially towards migrant sex workers. Even though selling sex is decriminalised, migrants – particularly from outside the EU/EEA – are affected by this punitive mechanism, as immigration enforcement operate in parallel with anti-trafficking and sex working policing. Moreover, third-country nationals often lack access to healthcare, housing or exit services, a system that has been criticized for masking structural inequalities under the guise of gender equality (Månsson, 2017), while Swedish nationals receive social support for exit strategies; foreigners are subjective to punitive governance. Migrant sex workers usually face discrimination under immigration and third-party laws that criminalise any facilitation of sex work, including renting accommodation and even hostels collaborate with the police and blacklist suspected sex workers, increasing housing precarity. (Florin, 2012; Kulick, 2003; Vuolajärvi, 2019:152-160). Outshoorn (2005:154) notes that Sweden’s policies have created a climate in which “migrant women are routinely assumed to be trafficked”, leading to indiscriminate surveillance and deportations.

Florin (2012) and Kulick (2003) argue that Sweden’s policy reflects a deeper ideological paradigm is equating all sex work with violence against women, thereby denying the legitimacy of sex work as labour. The law operates, apart from as policy, but also as a national moral message, presenting Sweden as morally superior within Europe (Kulick, 2003). Reports from sex workers indicate it increases of stigmatization, fewer choices of clients and diminished negotiating power due to the criminalisation of clients (Vuolajärvi, 2019:157; Östergren & Dodillet, 2011:599). Clients’ fear of legal consequences has led to faster transactions, increased risk-taking and reduced condom use. Besides, there are documented cases of sex workers being subjected to police harassment, confiscation of condoms as evidence and being forced to testify against clients (Kulick, 2003:205).

Stigma is not only a byproduct but a precondition for the law’s implementation (Levy & Jakobsson, 2014; Östergren, 2004). Jakobsson & Kotsadam (2011) demonstrate how Swedish public support for client criminalisation has reinforced stigma and punitives attitudes towards sex workers, contributing to their marginalization. In addition, for example, they may face,

exposure eviction, loss of child custody or deportation if they are suspected of engaging in sex work. As Levy and Jakobsson (2014:20) note, the criminalization of clients “has resulted in increased stigma and exclusion for sex workers, including state-enacted violence”. At the end, enforcement practices contradict the official claims that the law only targets buyers, revealing a de facto criminalisation of sellers.

At the cultural level, public discourse around sex work tends to reflect and reinforce the symbolic perspective. The narrative of sex workers is typically represented in medias as victims while buyers are predatory men whose behaviour must be corrected through criminal law and social climate often obscures the diversity of sex workers’ experiences and the structural factors, apart from contributing to sex workers not reporting crimes or seeking help from social services due to fearing stigma or other legal consequences (Danna, 2012). The law limits sex workers’ agency, as Östergren & Dodillet (2011) note, they reported feeling excluded, stigmatized and victimized from policymaking. Whilst, proponents claim that the law minimalizes sex working and trafficking, research indicates no clear reduction in sex work overall, only displacement to more hidden venues (i.e., online platforms or private apartments), as cited by Levy & Jakobsson (2014).

Although Sweden’s stated commitment to social support, evaluation show a mismatch between policy goals and practical implementations. Social interventions designed to help sex workers exit the industry are underfunded, poorly coordinated and inaccessible to migrants (Florin, 2012:170). Rekart (2005) and Krusi et al., (2012) argue that harm reduction – not prohibition – is essential to improving public health and safety for sex workers. Yet in Sweden, such approaches are rare and resisted by authorities. Consequently, these gaps weaken the model’s protective goal and make questionable its effectiveness as a rights-based strategy. Furthermore, the Swedish Model has limited health and harm reduction services. Unlike decriminalised regimes, it does not fund targeted health outreach for sex workers, which increases risks – especially for those already marginalized due to drug use, homelessness or undocumented status (Levy & Jakobsson, 2014:600).

In conclusion, while the Swedish model is framed as progressive and feminist, empirical evidence suggests significant unintended consequences. The model paradoxically reproduced inequalities it claims to eliminate. The policy has succeeded to shift the public discourse but also deepened the stigma, reduced safety and denied access to essential services for those it intends to protect. Vuolajärvi (2019) highlights how the dual governance structure – offer

social support to some but deny or punish others – based on migration status creates a hierarchy of deservingness that reinforces global inequalities of race, class and legal status. And Månsson (2017) notes that the law’s gender equality framing obscures the exclusion and racialized consequences of its application.

#### **b. Denmark – Partial Decriminalisation**

Denmark approach to sex work reflects a more liberal and pragmatic policy compared to Sweden, even though is also marked by contradictions and structural exclusions. It has undergone significant legal and discursive transformations, evolving from a system of state-regulated surveillance to one shaped by neoliberal welfare governance where self-responsibility, flexibility and individual choice are emphasized (Stormhøj et.al., 2015:222). Within this context, sex work is commodified as an economic transaction stripped of social and gendered meaning. Nevertheless, this discourse also hides the structural conditions (i.e., poverty, migration, trauma) that shapes individuals’ entry into sex work (Stormhøj et.al., 2015).

During the 19<sup>th</sup> century, women who sold sex were registered as “public women” and subjected to regular health checks and spatial restrictions. These early regulations aimed to contain sex working perceived moral and medical danger, particularly to “respectable” women and families (Bjønness & Spanger, 2018). However, by the early 20<sup>th</sup> century, formal surveillance mechanisms declined and sex work gradually became to be treated as a private matter between buyer and seller. In the same year, 1999 – when Sweden’s Sex Purchase Act was introduced – Denmark chose to decriminalize the selling and buying of sexual services between consenting adults (Bjønness & Spanger, 2018). But this legal recognition does not extend to the organization of sex work: brothel-keeping, third-party involvement and pimping remain criminalized (Skilbrei & Holmström, 2013:14). The partial decriminalization has created what Karlsson (2023:37) refers to a “legal grey zone”, where sex workers are expected to declare their income and pay taxes but are denied labour rights, social benefits and workplace protections. This structural ambiguity creates what scholars called a legal “double standard”, where sex work is technically legal yet treated as a persistent social problem (Bjønness, 2012:192; Huglstad et al., 2022:68).

Karlsson (2023) expands on analysing municipal exit programmes. These interventions construct the “vulnerable” subject as the norm, presuming damage, trauma and irrationality. They aim to transform the individuals into “wishful” subjects who voluntarily seek exit or counselling. Although, the policy logic positions non-vulnerable and non-compliant sex

workers as outside of the realm of care, and therefore reinforcing a binary that punishes those who resist categorization.

Migrant sex workers face additional barriers. While EU citizens may legally engage in sex work, those outside of EU/EEA are effectively banned from doing so. Immigration policy treats sex work as incompatible with residency that usually results in deportations and legal precarity for non-citizen workers. According to Tandler (2022), it creates the figure of the migrant as either a victim or a criminal. These contradictions are mostly dangerous for undocumented workers, who are often more targeted by the police and at the same time lack access to legal or health services, while anti-immigrant sentiment further adds to their exclusion. Additionally, authorities and media frequently conflate sex work with trafficking, reinforcing the idea that women in sex work lack rationality or autonomy (Bjønness & Spanger, 2021; Tandler, 2022).

Within this environment, sex worker-led organization like the Sex Workers' Interest Organization (SIO) have emerged to advocate for labour rights and recognition. Founded in 2008, SIO challenges the narratives by asserting that sex work is a form of work and that all sex workers deserve equal protections. However, the organization influence remains limited within Danish political and media landscapes, where its members are still sometimes excluded from policy consultations and portrayed as lacking legitimacy (Bjønness, 2012:194; Bjønness & Spanger, 2018). In contrast, there is still an influence of religiously affiliated NGOs like The Nest which has historically shaped a victim-centric view of sex works and advocates for the criminalisation of clients (Bjønness, 2012:194).

Moreover, the welfare state plays a crucial role in shaping the lived realities of sex workers. Recent scholars have challenged the victim-based frameworks by foregrounding sex workers' lived experiences. Hugstad et al., (2022) documented how Danish sex workers find meaning, empowerment and personal development in their work, despite facing legal barriers and social stigma. They have described sex work as a self-chosen occupation that provides them financial stability, autonomy and emotional fulfilment. On the contrary, participants also reported injustices caused by structural factors, for example, the inability to rent premises, lack of sick leave or social benefits and criminalisation of collaborations (i.e., hiring drivers or working with other sex workers) which reflects the broader societal refusal to recognize sex work as work (Hugstad et al., 2022; Kiepek et al., 2019).

In conclusion, it reflects a broader tension within the Danish welfare model that increasingly relies on moral merit criteria – resonating neoliberal austerity logics that define who is

“worthy” of state support. Sex work is tolerated but not supported through labour rights and policy relies on individual transformation instead of systemic change, positioning sex workers in a precarious legal and social position (Bjønness, 2021; Stormhøj et al., 2015).

### **3. Literature review**

The literature review was done using systematic searches in academic databases, including JSTOR, LUBsearch and Google Scholar. Some of the search terms included *sex work*, *Nordic Model*, *decriminalization*, *stigma* and *prostitution*. The review prioritized peer-reviewed articles and the findings were synthesized to identify cross-national trends and intersectional impacts within the field which further provided insights into how sex work is framed in academic literature.

Sex work, defined as the consensual adult exchange of sexual services for remuneration, has been a subject of legal, political and public health investigation. Across the globe, its regulation varies widely, ranging from full criminalization to legal regulation and decriminalisation. This literature review offers an overview of global sex work policy trends, focusing on empirical data evidence in regards to sex workers’ health, safety, legal status and access to services.

Globally, sex work has been entangled with migration patterns, as discussed by Immordino and Russo (2015) and Jakobsson and Kotsadam (2011), who provide a quantitative and comparative analysis on how economic disparities and labour mobility intersect with trafficking and sex work, economic inequality and global governance. Wagenaar and Jahnsen (2018:7-9, 18-23) highlight how local implementation varies widely, even within nations, and how discourse on trafficking often conflates voluntary and coerced sex work. Similarly, Wilson et al. (2015:72-74) discuss how transnational efforts usually focus on trafficking and criminal networks, while underemphasizing structural causes like poverty and gender inequality.

Sex work laws, as mentioned, differ across jurisdictions (Smith & Mac, 2018). In part of the Middle East and Africa, all aspects of sex work remain criminalized. On the contrary, countries like New Zealand have adopted decriminalisation models that remove punitive laws against sex workers, clients and third-parties; offering full labour protections. Another example is Australia mixed models, where some states implemented decriminalisation while others maintained criminal laws. In the case of The Netherlands and Germany it is followed a regulated approach, where sex work is legal under state regulation, as for example mandatory

registration and zoning – designated areas specifically for sex work (i.e., red-light districts) – determined by local municipalities (Wagenaar & Jahnsen, 2018:2).

Feminist theory influence and divide, not only academic debates, but jurisdictions and policy responses, as explore by Lewis (2016) and O’Neill and Scoular (2007), who examine how feminist ideological tensions are reflected in divergent legal frameworks and advocacy strategies – especially in contexts of cross-border migration and international trafficking (Outshoorn, 2004). Radical feminists view it as the ultimate expression of patriarchy and economic dependence, making true consent impossible, a perspective supported by empirical studies such as Cotton et al. (2002) and Farley (2003), which document harm, coercion and exploitation experiences by women in sex work, reducing them to sexual commodities (Gerassi, 2015:80-82). They argue that sex work is inherently coercive and violent, regardless of evident consent (Weitzer, 2010:15-17). This position, while influential, has been criticized for stripping sex workers of agency and homogenizing their experiences (Weitzer, 2010, 2018). In the contrary, sex-positive feminist and supporters of the sex work perspective assert women’s agency, framing sex work as legitimate labour deserving of rights and protections (Gerassi, 2015; Pheterson, 1993).

Weitzer (2010) critiques the “oppression paradigm” for its reliance on moral panic, anecdotal evidence and ideological rigidity. In contrast, Bacchi’s (2009) “What’s the Problem Represented to Be?” approach highlights how such paradigms construct the “problem” of sex work in policy debates, suggesting that what is seen as problematic is shaped by discourse itself rather than objective reality. These theoretical disagreements influence Western democracies and global policy bodies such as United Nations and international NGOs. Bacchi’s (2009) framework of problem representation shows how policy constructs the issue of sex work as a matter of individual pathology rather than structural inequality. Therefore, it is highlighted how policies shape realities by constructing certain issues as problems and marginalizing alternative perspectives.

Empirical research, such as done by Rekart (2005) has shown that criminalizing sex work contributes to violence, worsen health outcomes and leads to social exclusion. As well, Sanders (2005) argues that in criminalised environments, sex workers face harassment, police abuse and are denied access to legal and health services, in particular those who belong to marginalized communities (i.e., migrants or gender non-conforming). Scholars such as Cook (2006) and Graham (2017) have explored how legalisation of sex work impacts labour rights,

working conditions and the economic positions of them within legal and policy frameworks which often fails to eliminate violence, trafficking or stigma (Matthews, 2008; Cho et al., 2013). Decriminalisation advocates argue that removing criminal penalties promotes rights, health and safety (Wagenaar & Jahnsen, 2018; Weitzer, 2010, 2018), a view that aligns with sex work perspective and it emphasizes on harm reduction (Skilbrei & Holmström, 2013).

In addition, stigma continues to be a persistent barrier, even in jurisdictions with partial decriminalisation or legalisation. It can manifest in discrimination by service providers, denial of housing or parenting rights and institutional exclusion. However, as Jakobsson and Kotsadam (2011) demonstrate, public acceptance of sex work correlates strongly with national legal policies. In countries where sex work is legalized or regulated, citizens are significantly more accepting of its purchase than in countries where it is criminalized. Laws that frame sex work as immoral or exploitative reinforce that stigma, even if sex work is legal, indirect penalties – such as evictions or custody loss – continue to affect sex workers (Levy & Jakobsson, 2014). Reduced stigmatization in legalized settings raises the net gain from buying and selling sex, while criminalization tends to suppress demand through heightened moral judgment and risk of reputation loss (Jakobsson & Kotsadam, 2011).

These attitudes are not merely individual but are shaped by broader legal and cultural contexts that reflect deeper socio-political issues that delegitimizes sex work as labour (Matthews, 2008). Gender equality, as an example, plays a crucial role in shaping these attitudes, as Jakobsson and Jonsson (2017:63) claimed, in countries where the purchase of sex is prohibited, individuals are more likely to value gender equality, while in contexts where it is legalized, the same individuals are more accepting. Efforts to combat stigma include legal reform and public education, besides the acknowledgment that sex worker organizations exist. Advocacy groups, like SIO in Denmark or RUS in Sweden, promote harm reduction and challenge public misconception (Karlsson, 2023:42). Immordino and Russo (2015:218-219) also demonstrated how stigma remains a persuasive issue, while empirically, legalization reduces stigma and increases tolerance, even though it also leads to a bigger variability in opinions in complex ways about sex work.

Moreover, health concerns dominate much of the literature around sex work. The WHO (2012) recommends full decriminalisation of sex work by arguing that legal status is a determinant for better health outcomes. Rekart (2005) points out that criminalisation undermines safe sex practices (i.e., fear of arrest or confiscation of condoms deters sex workers from carrying them);

the legal threat results in hurried transactions and diminished negotiation power, which raises STI transmission risks. Additionally, Sander & Soothill (2011), have found that drug-using or homeless sex workers face compounded obstacles to accessing healthcare services in criminalised regimes.

The framing of sex work as either labour or violence against women is important for its politization. Violence is a widespread issue in the sex trade, sometimes exacerbated by punitive laws. Dewey and St. Germain (2014:260) and Williamson et al. (2007:23) have reported that street-based sex workers commonly experience police violence and develop avoidance strategies. Some of these strategies include identifying undercover officers and negotiating with client in secluded areas, which increases the risk of violence and limits their access to help. They point out that police harassment and surveillance disproportionately affect marginalized groups and the criminalisation of sex work contributes to an environment where perpetrators of violence go unpunished, as victims cannot safely report crimes without fear of arrest or deportation. By contrast, in decriminalised or regulated environments, sex workers have a greater ability to organize for protections, deny clients or work indoors – factors that have shown to reduce the risk of violence (Levy & Jakobsson, 2014:19).

In the case of Sweden, sex work has been defined through an abolitionist lens and seen as a violent and patriarchal manifestation of gender inequality (Ekberg, 2044; Outshoorn, 2004) promoted as part of systemic gender violence whereas its focus is in exit strategies (Matthews, 2008; Skilbrei & Holmström, 2013; Wilson et al., 2015). In Denmark, however, adopting a more regulatory approach it creates a framework for social intervention, but it still limits sex workers' access to labour rights or union representation – any form of collective organization – that could risk being criminalized as pimping or third-party involvement (Karlsson, 2024). Although, it reflects different moral and feminist underpinnings (Cho et al., 2013; Skilbrei & Holmström, 2013), both models result in marginalization.

The outcomes of this legal ambiguity are apparent. Sweden's model, through is framed as progressive, is not without critique. While some scholars applaud the demand-reduction approach for challenging and reshaping cultural norms around male entitlement (Ekberg, 2004; Wilson et al, 2015:72), others argue that the law forces sex work more underground, increasing risks for workers and fostering stigma. Clients may be discouraged to purchase sexual services due to the legal consequences, thus meaning a reduction of visible sex work, yet it still increases its marginalization (Cho et al., 2013:69). As Cotton et al. (2002: 1793-94) argue, myths

surrounding sex work often mirror rape myths: they serve to justify violence and sustain unequal gender norms.

Denmark, in the contrary, simultaneously taxes sex workers while denying them employment benefits, leading to a paradox where legal recognition does not equal legal protection (Bjønness, 2012:194; Mildwater, 2021, in Tendler, 2022:49). Furthermore, for migrant sex workers, policies result in even harsher outcomes. Non-EU citizens are either criminalized or classified as trafficked, neither of which allows them to work legally, thus increasing their vulnerability and marginalization (Tendler, 2022:41). The only legal route for many is to conform to the victim narrative – declaring themselves trafficked – which leads to deportation, instead of integration, under the premise of “rescue” (p.42). This dynamic reveals how strict immigration controls intersect with sex work laws to intensify state control over marginalized individuals.

Continuing with the intersection of migration and sex working, it has been seen that migrant sex workers are uniquely vulnerable due to this linking. In most jurisdictions, even where sex work is legal, non-citizens (particularly from outside of EU) are prohibited from engaging in it, which creates a legal contradiction. Migrant sex workers may be considered as legal residents but illegal workers that are subject to deportation without access to the process itself (Tendler, 2022:18). Furthermore, migrant sex workers are often misclassified as trafficking victims, leading to punitive rescue operations and involuntary repatriation (Outshoorn, 2005:154). These policies not only silence migrants’ voices but also ignore the realities of economic migration and labour agency (Smith & Mac, 2008:75). The criminalisation of sex work and migration status combined creates, as Smith & Mac, (2008:70) documented, more precarity, denial of access to healthcare, housing and even justice. Karlsson (2023:44) also describes how these structural exclusion result in constant surveillance, vulnerability to violence and inability to advocate for improved conditions.

The victim narratives dominate the policy and media discourses. On one hand, is challenged by sex workers organizations that advocate for the recognition of their voice and labour rights, arguing that many individuals engage in sex work voluntarily and seek agency rather than rescue (Bjønness, 2012; Tendler, 2022). The dichotomy between “victim” and “agent” underscores the limitations of dominant anti-trafficking narratives that often silence the diversity of experiences and identities. On the other hand, media frequently depict sex workers as irrational and without agency, laying the foundation for a hostile public opinion and legitimizing punitive

state responses and excluding them from political discourse, as (Bjønness, 2012; Tendler, 2022) and notes. These depictions ignore the complex realities of sex workers, including their strategic navigation of risk, income needs and legal ambiguities (Tendler, 2022:46-47).

Both countries define sex work as a social problem residing within the individual rather than society, thereby legitimizing state interventions that ignore issues like poverty, gender inequality or immigration policy (Karlsson, 2024:449-450). Scholars like Sanders (2005) and Cook (2015) highlight how such models essentialize sex workers' experiences and ignore their agency, then reinforcing the narrative of passive victimhood.

Harm reduction strategies, such as those described by Wilson et al. (2015) aim to minimize immediate risks but may reinforce marginalization if not paired with broader rights-base reforms. Lewis (2010) critiques the narrow framing of harm in sex work policies by connecting harm only with legal violations, which ignore the bigger structural and cultural harms inflicted by the laws themselves. As well, they critique that community-based restorative justice approaches in sex work often focus on victimization and public problem, offering moralizing sessions for buyers and workers that reinforce the stigma rather than promote inclusion.

However, community-based interventions offer a viable alternative, as reinforced by scholars such as Fawkes (2014), Graham (2017) and Pitts et al., (2006), who highlight the importance of lived experiences and grassroots engagement in shaping effective, sustainable responses, in particular those led by practitioners or involving participatory frameworks. Moreover, Fawkes (2014), Kiepek (2017) and Pitts (2006) focus on models that prioritize also agency and community empowerment in designing and delivering support for sex workers. Alongside insights from Krusi et al., (2012) and Rekart (2005), who emphasize trauma-informed care and underlines the role of harm reduction and public health strategies; initiatives – if culturally and economically contextualized – can address structural inequalities and improve well-being

Likewise, both countries emphasize exit programmes aimed at guiding sex workers away from the industry, often without addressing structural factors that constrain their choices (Karlsson, 2024:450-452; O'Neill & Scoular, 2007). These programmes usually individualize the issue of sex work to behaviour change and trauma recovery (Wilson et al., 2015:74), associating harm with crime as defined by state law, excluding broader cultural and structural harms inflicted by stigmatizing policies themselves while at the same time lacking inclusivity and suppressing self-representation (Lewis, 2010; Karlsson, 2024).

Ultimately, effective policy must take into account the diverse realities of sex work. Legalizing sex work has complex implication for human trafficking. While legalization may increase demand, it does not eliminate trafficking, especially as trafficked individuals remain vulnerable due to their legal and social status (Cho et al., 2012). Legal frameworks alone may not be sufficient to decrease trafficking. Despite Sweden's stricter laws, trafficking persists due to a clandestine market dynamic and consumer preference for "exotic" workers (Cho et al., 2012:76), so in a broader scale, the legalization does not eliminate trafficking. Cho et al. (2013) find that legal status often correlates with increased trafficking inflows, although causality is hard to establish due to data limitations. For instance, in their study, Denmark has an estimated 2,250 trafficking victims in 2004, compared to Sweden's 500, despite its larger population. The number of sex workers in Denmark was also substantially higher, suggesting that legalization might increase the overall size of the market without reducing the proportion of trafficked individuals. This would imply that the scale effect, more sex workers overall, may override any substitution of trafficked individuals by legal workers.

Overall, academic research on sex work regulation reveals persistent ideological tensions that shape legal frameworks and the discursive constructions of sex workers themselves. The Nordic context underscores how similar welfare state structures can produce opposing policy models – either framing sex work as inherently violent that advocates for client criminalization as a feminist intervention; or focusing on harm reduction strategies where sex work is labour and foreground the agency of those involved. Yet, both models present unintended outcomes.

#### **4. Methodology**

This research is situated within a feminist qualitative research paradigm and adopts a comparative case study design to examine how sex work laws and policies affect people involved in this industry in two countries, Sweden and Denmark by drawing insights from DeVault & Gross (2014), Gunaratman & Hamilton (2017), Hesse-Biber (2012), Philips & Hardy (2002), Pillow & Mayo (2012) and Preissle (2007) between others. Feminist methodology serves not only as theoretical commitment but as an ethical and epistemological stance that informs the entire research process, from the formulations of research questions to the interpretation and analysis of the findings. This study does not seek to detached neutrality but rather embraces a relational, reflexive and politically engaged approach to knowledge production.

Feminist scholars have long challenged dominant paradigms of social science that privilege objectivity, generalizability and detachment as the standards of rigor. Instead, feminist epistemologies argue that all knowledge is situated, partial and shaped by power relations (Gunaratnam & Hamilton, 2017; Haraway, 1988; Hesse-Biber, 2012; Nagar et al., 2014). Knowledge production is not a neutral process and research is always mediated by the social positions of both the researcher and participants, in this view, feminist methodology is not just about studying “women” or “marginalized people”, but questioning how knowledge is produced and for whom, by questioning the conditions under which voice is constructed, authorized and received (Hughes, 2002; Pillow & Mayo, 2012). Drawing on Hall’s (2001) notion of the “spectacle of the Other”, the study remains alert to the ways sex workers are framed through racialized and moralized lenses that reinforce dominant cultural narratives rather than reflect lived realities.

These commitments directly informed the research design, sampling strategy, data collection, methods and analytical approach. For example, rather than aiming for statistical generalization, the study aims for analytical depth, contextual specifics and a reflexive understanding of the co-production of knowledge between the researcher and the participants.

#### **a. Research design**

The study employs a comparative qualitative case study design focused on Sweden and Denmark – two countries that share regional, cultural and political similarities but differ in their legislative approaches to sex work. This comparative framework allows for the exploration of how different legal regimes and ideological discourses shape not only the formal regulation of sex work but also public attitudes, institutional responses and the daily lives of sex workers (Crowhurst & Skilbrei, 2018; Wagenaar & Jahnsen, 2018). The cases were chosen for their contrast and for their relevance to ongoing debates about the effectiveness and ethics of different legal model in regulating sex work, particularly in Europe (Bjønness, 2012; Levy, 2014), with the study purpose of going beyond comparing only laws but also how they operate in practice and how they interact with institutional discourses affecting sex workers.

Qualitative case study methods are especially well-suited to feminist methods because they prioritize contextual richness, interpretative depth and attention to meaning-making processes (DeVault & Gross, 2014; Pillow & Mayo, 2012). As Stake (2005) and Yin (2009) argue, case studies allow researchers to explore complex social phenomena in their real-world settings. In

this project, each country is treated not simply as a policy system but as a field of contested discourses, practices and power relations. This approach enables an intersectional analysis that accounts how legal, social and institutional factors converge to produce specific forms of exclusion, control and resistance (Crenshaw, 1991; Fawkes, 2005; Karlsson, 2023).

The discursive analysis was chosen because the intended question of the analysis is “what the text does”, in contrast with a textual analysis where the focus is on “what the texts says” (Bacchi, 2009; Phillips & Hardy, 2002). By centring the view on its function – how it is said, why it matters, what is the subjects’ positions, what silences can be observed – the documentary sources are analysed as how they construct meaning, identities, power relations withing a broader social, political and institutional context (Bacchi, 199; Hall, 2001). At the same time, this resonates with Preissle’s (2007) emphasis on theoretical depth and attention to the social life of policy documents.

Thematic analysis is a method in qualitative research used to identify, analyse and report patterns in the data set (Braun & Clarke, 2006: 79), which made possible to work with the transcriptions of the interview and find common threads and repeated patterns within the views and lived experiences of sex workers talked about by the board members in the organizations. These themes capture important information about the data in relation to the research questions, influenced by the frequency and meaning they give to the researched matter. Although the approach is inductive – as the analysis and selected themes were not shaped by the theoretical frameworks – it is important to note that as “researchers cannot free from theoretical and epistemological commitments”, thus the coding process have been influenced to some extent by the subjectivity of the researcher (Braun & Clarke, 2006: 83-84).

The analysis follows Braun and Clarke’s (2006) guide: familiarizing yourself with the data, generating initial codes, searching for themes, reviewing themes, defining and naming themes and producing the report. All transcripts have been read multiple times and notes were taken constructing a preliminary list of ideas. Meaningful and repeated data were identified and then coded segments were divided into groups based on potential themes and analytical interests, besides of been read and reviewed several times. Direct quotations that could not be used and cited in the analysis for ethical reasons have been paraphrased, as well as summaries of the conversations were used. The results of this research are interpretations with the aim of producing a coherent narrative of data.

## **b. Data collection**

Given the sensitivity of the topic and the difficulty in accessing marginalized and vulnerable groups such as sex workers directly, as well as limitations in research resources, the main focus is on interviews with members of organizations that work with or advocate for sex workers, as well as those engaged actively in related policy work. These include: Red Umbrella Sweden (RUS) – a Swedish organization engaged in advocating for the rights and safety of sex workers, focusing on policy reform and social justice issues –, Sexarbejdernes Interesse Organisation (SIO) – a Danish organization supporting sex workers, promoting their rights and advancing their representation in both social and legal spheres through direct activism and advocacy efforts –, and Red Van Project – a community-based harm reduction initiative working to provide support and resources for individuals in the sex industry – from Denmark.

These organizations were chosen for their knowledge and long-standing involvement in sex work related issues, national laws and social attitudes, either through direct contact with sex workers or through their awareness efforts. The participants in this study held board positions within their respective groups. In the case of the participants affiliated with sex worker advocacy organizations the participant was either a current or former sex worker, which ensures that the insights provided are grounded in lived experience as well as advocacy practice. Additionally, several other organizations were contacted, but interviews could not be arranged; therefore, in these cases, information from their websites and public materials was used to complement the analysis (Appendix I, Table 1 for a full list). This approach allows the research to capture both lived experiences (through sex worker representation) and institutional or societal framing (through NGOs and advocacy actors).

In addition to the interviews, this research also uses a comparative analysis of reports, guides, booklets and other policy-related documents from both advocacy groups representing sex workers and organizations critical of sex work as a legitimate form of labour, reflecting contrasting policy perspectives for further insight into the ideological foundations and implementations of these policies in both countries. By combining these different sources, this research will critically assess whether these policies fulfil their intended protective functions or contribute to more marginalization and harm.

### Document Data

In the first place, relevant policy documents and texts were collected from official government websites and advocacy organizations, with the purpose to provide a broader understanding of the national contexts in Sweden and Denmark. Accordingly, the data set includes 14 policy and advocacy documents produced by a range of actors, including international NGOs (Amnesty International, WHO), feminist and abolitionist networks (WAVE, CAP, EWL), sex worker-led organizations (ESWA, NSWP) and campaigns (Nordic Model Now!). these documents cover various types of genres – policy briefs, advocacy reports, myth-busting pamphlets, annual reports and technical guidelines – reflecting a diversity of ways to frame sex work, assert institutional legitimacy and produce meaning through discourse.

That being said, the documents were selected to provide a contextual and ideological background to the perspectives shared in the interviews. As an alternative to analysing legal texts or legislation directly, the research focuses on how sex work policy and public discourse are framed and justified through these materials. Key sources were collected from official organization websites and international bodies, with a deliberate balance between abolitionist and sex worker-led perspectives. It was paid particular attention to how these texts represent national contexts, specifically Sweden and Denmark, how it is framed issues of legality and how the narratives are constructed around terms of rights, harm, safety and justice.

Once all relevant documents were gathered, it was carefully extracted the information more pertinent to the study research questions. Then the data was coded and categorized thematically, which facilitated a systemic comparison between the Swedish and Danish national legal and policy contexts and frameworks and how the approach impacts sex workers.

### Interview Data

Following to the documentary collection, initial contact with the organizations was made directly via email and/or telephone – depending on the available contact information – and provided with a background information about the study before the interviews were scheduled. The semi-structured interviews were guided by a set of open-ended questions and ranged between 30 minutes to 1 hour, depending on the participants availability and the depth of discussion., though the interview guide was adjusted slightly depending on the organization's profile – whether they represent sex workers directly or work primarily on policy and advocacy – while maintaining comparable thematic categories. By doing so, it is ensured consistency in the analysis while respecting each interviewee's role and expertise. Secondly, some of the

interviews were conducted in person and others were done via Zoom, depending on availability and location. Finally, the interviews were recorded, transcribed and analysed using thematic analysis, allowing for the identification of common key themes and patterns in participants' responses.

The interview guide was developed based on the research objectives and the questions were designed to balance structure and flexibility, based on feminist qualitative interviewing practices (DeVault & Gross, 2014; Kvale & Brinkmann, 2009) – offering participants a clear framework while leaving space for them to share their experiences and insights freely (see Appendix II, document 1). Each interview began with a short introductory process, with a repetition of the research aims and a reminder of the participants' rights – informed consent form (see Appendix II, document 2) – and after the interview was recorded for future transcription and analysis ensuring confidentiality and anonymization. Moreover, it was made clear at the beginning of each conversation that the interview was being conducted from a neutral, non-judgmental perspective.

The interview guide was designed around four thematic areas: organizational role and mission, policy frameworks, public attitudes and everyday realities of sex workers. The format allowed for follow-up questions and for new themes to emerge naturally, particularly when participants raised experiences or perspectives that were not anticipated in the initial guide. This research method was especially important given the complexity of the topic and the diversity of viewpoints within sex work activism and policy.

### **c. Data coding and analytical process**

Given the qualitative and critically discursive nature of this research, data coding was conducted manually, enabling a close and reiterative engagement with both policy texts and interview transcripts. This approach was chosen to align with the reflexive and interpretative positioning of the research while maintaining flexibility in how meaning, language and power relations were understood in context (Braun & Clarke, 2006; DeVault & Gross, 2014; Pillow & Mayo, 2012). This approach foregrounds the role of the researcher not as a neutral observer but as an active interpreter shaped by theoretical commitments and positionality (Sixtensson, 2021, Gunaratnam & Hamilton, 2017).

In accordance with the research design, the documentary sources were analysed first to identify dominant policy discourses, ideological framing and representational strategies surrounding

sex work in the Swedish and Danish contexts. The discursive mapping informed and contextualized the consequent thematic coding of the interview data, it allowed to attend to what participants said and also how their experiences were shaped within the dominant legal and institutional narratives (Bacchi, 2009; Deterding & Waters, 2021; Leurs, 2017; Phillips & Hardy, 2002).

### Document Coding

The diverse documents – reports, guides and other policy transcripts – were treated as textual data and analysed using a critical discourse approach (Bacchi, 2009; Hall, 2001). Each document was assigned a short reference code according to the acronym of the organization and the year of publication (for example, EWL2017, ESWA2020) to ensure consistency in referencing across the analysis. As well a matrix was created to be able to track recurring discursive patterns across the dataset, such as subject position, language structures and strategies and ideological framings.

The codes were revisited in the light of new findings from the interviews, allowing a “dialogue” relationship between the empirical and documentary data (Murray, 2022). Special attention was paid to how language construct the sex worker (legitimate worker, vulnerable victim or morally deviant individual) and absences – what is not said, who is not positioned as a speaker (Foucault, 1982; Scott, 1991; Goffman, 1963). Ultimately, the coding process was informed by theoretical frameworks, which helped to connect the discursive patterns found within wider structural contexts.

The goal was to identify the content but at the same time to understand how language constructs meaning and legitimacy in debates over sex work policy, how experiences are lived and how they are represented in the context of legality, visibility and control.

### Interview Coding

The interview data was coded in two stages. First, transcripts were reviewed line by line to identify recurring themes and concepts grounded in the participants’ experiences. Some of the initial codes included: safety, stigma, legality, migration, agency, surveillance and institutional trust. These concepts were developed inductively, emerging from the data itself rather than predefined categories (Braun & Clarke, 2006). However, the analysis acknowledges that coding is never “theory-free” and was inevitably shaped by the researcher’s academic

background and feminist epistemology (DeVault & Gross, 2014; Gunaratman & Hamilton, 2017).

For the purpose of anonymization and to maintain clarity during the analysis, participants were assigned unique codes. Each participant was labelled based on their national context and order of interview: SE stands for Sweden and DK stands for Denmark. A numerical identifier was added according to the interview sequence, so for example, SE1 refers to the first participant from Sweden while DK1 refers to the first participant from Denmark. In the same line as the discourse codes, this ensures that quotations are consistently referenced in the analysis and without revealing any identifying information.

Secondly, thematic codes were re-read to examine how participants framed their experiences – what language did they use, what metaphors or binaries appeared, how they positioned themselves in relations to institutions (i.e., police, health services or immigration systems) (Bacchi, 2009; Phillips & Hardy, 2002). Throughout the process, the thematic coding table, also functioned as a coding log, documenting the development of the initial codes. As interview transcripts were re-reviewed the codes were grouped into broader themes and subthemes and for each topic, key insights were noted alongside interpretative reflections, so the data could be linked later to the discursive and theoretical frameworks.

While the table only represents the synthesized version of the final coding structure, a summary of the thematic outcomes, it also reflects the analytical reasoning behind, contributing to transparency and rigor in the qualitative process (Braun & Clarke, 2006; Murray, 2022).

#### **d. Ethical considerations**

Ethical sensitivity was crucial to design and conduct this study, especially given the socially and politically sensitive nature of sex work, as well as the vulnerabilities that sex workers face and the organizations that represent or advocate for them. This research aligns with feminist ethical frameworks that reject the assumption of neutrality and instead emphasize relational accountability, care and justice (Pillow, 2003; Hesse-Biber, 2021). The ethics of feminist inquiry are centred on the procedural dimensions of consent and anonymity but also on how power, representation and voice are negotiated within the research encounter.

Prior to each interview, participants received detailed information that outlined the aims, scope and anticipated uses of the study. Consent was obtained through signed forms and re-affirmed verbally at the beginning of each conversation. Participant were explicitly informed of their

right to withdraw at any time, refuse to answer specific questions or request deletion of data. These measures ensured formal ethical agreement, but the ethical orientation of the project extended beyond institutional requirements.

As feminist scholars such as Preissle and Han (2012) argue, ethical research must be context-sensitive and ongoing rather than confined to a single moment of agreement. Throughout the interview process, I was attentive to any sign of fatigue, discomfort or hesitation and adapted the pace and direction of conversations accordingly. Participants were encouraged to share as much as they felt comfortable sharing, and while it was reminded that their expertise was both valued and voluntary.

Confidentiality was strictly maintained. Given the politically sensitive nature of the field, extra caution was taken in anonymizing data. One of the participants' organizations requested full anonymity due to the legal and social risks associated with their work, however, for the remaining organizations, pseudonyms have been used and any potentially identifying details have been altered. All audio and video files, and transcripts have been stored on an encrypted, password-protected device accessible only to the researcher.

Moreover, it was taken into account the methodological implications of using platforms such as Zoom for qualitative interviews (Archibald & Munce, 2015), taking notice of both the opportunities for broader access and the ethical and relational challenges presented in the interactions.

Apart from procedural ethics, the study was guided by the feminist imperative to reduce and avoid any possible harm. This way, I attempted to build relationships based on trust and transparency. Participants were invited to request the final analysis for feedback or critique. This participatory act was intended to counterbalance the historically eradicated tendencies of academic research, particularly in relation to sex work communities who are often spoken about but rarely listened to.

A final ethical concern was representation. As a researcher analysing organizations that advocate on behalf of sex workers, rather than interviewing sex workers directly, I remained aware of the potential to further distance research from lived experience. While organizational representatives were deeply embedded in their communities and often themselves former or current sex workers, the study does not claim to speak for all sex workers. Instead, it is highlighted how knowledge is constructed through advocacy, policy negotiation and institutional struggle where the voices of sex workers are often mediated, shaped or silenced.

### **e. Limitations**

This research is shaped by several limitations, some of which are inherent to qualitative inquiry and other that are specific to the topic and aim of this study. First and foremost is the issue of representation. By focusing on organizational perspectives, this study privileges the views of advocates and intermediaries, instead of directly capturing the diversity of sex workers' experiences. While this choice was made intentionally, to prioritize the insights of those deeply involved in policy and frontline work, it also risks omitting the voices of those sex workers who are not affiliated with support services or who work in more precarious or clandestine environments.

Secondly, the study's sample size was essentially small. Interviews were conducted with four organizations, selected through purposive sampling. While it allowed for in-depth contextual engagement, the findings are not statically generalizable. Nevertheless, generalizability is not the goal of feminist qualitative research, which instead aims for depth, reflexivity and theoretical insight (Preissle & Han, 2012). Besides, readers should be cautions in extending these findings to broader populations or assuming uniformity across the sex work communities in Sweden and Denmark.

Another limitation lies in the temporal and political period of the research. Legal frameworks and public debates around sex work are dynamic and often shift in response to political pressures, media events or advocacy campaigns. As such, this research reflects a specific moment in time and may not capture future developments or long-term policies outcomes. Additionally, as a non-native speaker and outsider to both national contexts, there were inevitable limits to my cultural literacy and contextual knowledge, which I sought to minimise through an extensive background research and engagement with local experts.

Language also posed minor challenges. While all interviews were conducted in English, for participants this was a second language, which may have shaped their ability to express complex ideas or reflect nuance. I attempted to be cautions to these limitations by allowing participants to speak at their own pace, and if needed use expressions in their native language, as well as offering clarifications and providing space for revision if necessary.

Finally, the scope of the research meant that some relevant areas, such as the experiences of trans and non-binary sex workers or the specific dynamics of online sex work, could not be addressed in depth. These gaps suggest opportunities for future research and serve as a reminder of the complexity and heterogeneity of sex work as a field of examination.

## **f. Reflexivity and Positionality**

As a feminist researcher, I recognize that my presence, worldview and methodological choices are not neutral or invisible. Positionality – the social, cultural and political positioning of the researcher – shapes every aspect of the research process, from the framing of the questions to the interpretation of findings. In this study, I approached the topic of sex work with a commitment to challenge dominant narratives that criminalize and pathologize sex workers and centre perspectives that emphasizes rights, autonomy and social justice.

At the same time, I remained conscious of the fact that I do not share the lived experiences of engaging in sex work, nor I am situated within the cultural and legal contexts of Sweden and Denmark (Clarke, 2014; Sixtensson, 2021). This distance required me to approach the research with humility and willingness to listen, learn and be corrected. I actively engaged in reflexive practices such as journaling, memo writing and critical peer feedback to surface and examine my assumptions.

Feminist theorists like Pillow (2003) have written about the “reflexivity of discomfort” – the idea that reflexivity should not only affirms the researcher’s insight, but also expose the limits of their knowledge, the contradictions in their stance and the discomforts that come with engaging in ethical and complex power dynamics. I embraced this discomfort as a necessary part of doing feminist research, meaning that by acknowledging that I did not fully understand a context, that my interpretations might be flawed and that I needed to let go of control in the research process (Murray, 2010).

I also considered how my academic status might be perceived by participants. In some cases, I sensed hesitation or cautiousness when participants discussed politically sensitive topic related to stat policy or funding. To counterbalance this, I was transparent about my research goals, critical orientation –feminist, intersectional and analytic, challenging dominant narratives that silence or misrepresent sex workers while centring their voices and knowledge– and ethical measures used in order to protect participant anonymity – use of pseudonyms, remove all identifying information from transcripts and store data securely. As well, in line with Sixtensson, (2021) I practiced contextual anonymization, thus omitting any geographic or organizational references that could inadvertently reveal identities, to minimize the risk of deductive disclosure.

Ultimately, I view this study as a situated, partial and evolving contribution to ongoing conversations about sex work, policy and feminist ethics. It is shaped by the tensions of

researching across difference, by the commitments of feminist scholarship to do no harm and by a deep respect for the knowledge produced by those working at the margins of policy and society.

## **5. Theoretical frameworks**

The theoretical framework for this research draws on a combination of feminist, sociological and critical theories to unpack the intersecting discourses, legal practices and institutional mechanisms that shape the everyday lives and representation of sex workers in Sweden and Denmark. Particularly, the analysis is informed by the work of Kimberlé Crenshaw, Michael Foucault, Stanley Cohen, Erving Goffman and David Garland. These perspectives offer conceptual tools to interpret both the discursive content of policy documents and the narratives of sex worker-led organizations, and by doing so, highlighting how systems of power regulate sex work as a practice and how it positions sex workers as political and social subjects.

Crenshaw's (1989) foundational theory of intersectionality provides a critical lens through which the layered experiences of sex workers, especially those who are migrants, gender non-conforming or racialized, can be understood. It was originally developed to critique the limitations of single-axis legal frameworks in addressing the discrimination faced by Black women, where Crenshaw argues that systems such as race, gender, class and immigration status do not act independently but rather intersect within each other to produce unique forms of marginalization. Therefore, intersectionality, challenges any analysis that isolates one form of oppression at the expense of others. In the context of sex work, is particularly valuable in understanding how the experiences of sex workers are shaped by their involvement in sex work per se, but also by their racial, gendered, classed and legal identities. This can be visible, especially, in the data from Sweden, where migrant sex workers are subject to intensified policing and risk of deportations, despite the fact that selling sex is not illegal. These compounded vulnerabilities are not incidental but a product of policy and discursive environments that frames migrant, racialized or gender non-conforming sex workers as inherently suspicious. Even though references to race, class and gender were limited in the interview data, intersectionality still remains indispensable as to analyse identities and question how policies, institutions and discourse functions in ways that reinforce or exploit these identities. Crenshaw's later articulation of structural intersectionality (1991) focuses on how supposedly neutral policies unnoticeably reproduce social exclusion. It can be reflected in legal

frameworks that deny sex workers access to protection and participation, while at the same time exposing them to surveillance and stigma.

Continuing with Foucault's work on discourse, power and sexuality, is also deeply important for this research. In *The History of Sexuality* (1978), Foucault argues that sexuality is not a fixed biological essence but is constructed through discourse, surveillance and institutional power. Thus, the regulation of sexuality, sex and sexual behaviour is part of a bigger project of governance. With this view, the framework allows for an understanding of how sex work is not merely an act imperil to legal sanction but a category itself of subjectivity constructed through overlapping regimes of knowledge and control. In this context – states, medical institutions, media and feminist discourses participate in producing – the “sex worker” as a particular type of social figure, frequently is deviant, pathological or victimized. For example, the Swedish Purchase Act (1999) is not simply a legal policy but a biopolitical instrument: it constructs certain sexual objects – typically the female victim and the male predator – and embeds these identities into a broader moral economy that links gender, sexual respectability and nation. The law works both as a criminal sanction and as a symbolic one, it shapes public perceptions, alters interpersonal dynamics between sex workers and clients and/or reinforce stigmatizing norms. Moreover, Foucault's notion of governmentality is key in this context. It describes how modern forms of power govern norm, institutions, agencies and discourses, not directly through force, and re-shape behaviours and self-perceptions of individuals. It can be seen in how sex workers sometimes internalize these messages, often altering their practices, hiding their work or disengaging from institutions due to the fear of judgment or punishment. These cases are particularly evident in the interview data coming from Sweden, where participants stressed about being surveilled, evicted or deported, even though no formal law was broken.

Can be said that these effects are not accidental but part of the productive power of the law that shapes what individuals think and say, and inclusive how the treatment – here, sex workers – in discourse: who is allowed to speak, who is recognized and who is delegitimized in advance. Many of the policy documents analysed in this research have demonstrated how sex workers are constructed as objects of concern rather than subjects deserving rights. Their voices are often absent, replaced by experts, politicians or NGOs that speak on their behalf. It reflects what Foucault criticizes of how knowledge and power intersect: those who are silenced are not only ignored, but actively disqualified as knowers. Therefore, the issue is not only exclusion from material resources but from epistemic legitimacy per se.

While Foucault offers a macro-level theory of discourse and power, Cohen (2002) work on the concept of moral panic offers a view through which is examined the affective and symbolic construction of sex work as a threat to the social order. In *Folk Devils and Moral Panics*, Cohen describes how societies respond to perceived threats by exaggerating deviance through media, political and public narratives. These perceived threats are manifested into the figure of “folk devil”, a scapegoat who embodies wider anxieties about moral decline or social instability. In the context of sex work, this often takes the form of panic around trafficking and exploitation, public health or moral values. Sex workers and clients are framed as problems to be solved and not people to be heard. Besides, media coverage by emphasizing rescue narratives, it ties consensual adult sex work to criminal trafficking networks and continues to generate a climate of fear and justified state interventions. One of the panic purposes as state interventions is that it legitimizes punitive policy while reshaping or reaffirming dominant norms around gender, sexuality and public order – depending on the national context. As participants also noted in the study, the law does not only affect their legal status but it changes how they are perceived by society and how they perceive themselves.

This framework is closely related to Goffman’s (1963) theory of stigma, which defines stigma as a social process by which individuals are discredited or devalued based on attributes deemed undesirable. Stigma does not only reflect individual prejudice, it is also structured into social interactions, institutions and policies. Goffman’s idea that deviance is not inherent but socially assigned is especially useful for analysing how sex work becomes marked as socially illegitimate. In both countries, Sweden and Denmark, sex workers reported concealing their profession due to shame, fear or social inclusion, as well as, risk of losing access to housing and healthcare. Despite the fact that sex work is legal in Denmark, it is still not fully accepted, more like tolerated. This reflects a deep entanglement between legality and legitimacy: being legally allowed to work does not guarantee social recognition or protection from harm. Consequently, stigma performs as a way of power by shaping behaviour, limiting opportunities and reproducing inequality through the use of informal norms.

Garland’s (2001) theory of social control expands these insights by focusing on how modern states manage marginalized populations via a combination of symbolic governance, institutional regulation and indirect coercion. For Garland, laws and policies that target certain behaviours – such as sex work, migration or drug use – are not solely about prevention or dissuasion. They serve for broader political purposes, like signalling moral boundaries, maintaining social control or responding to perceived threats. For example, in Sweden, the

criminalization of the clients can be seen as a symbolic gesture that reasserts normative gender and sexual hierarchies instead of a protective measure. The law communicates that sex work is wrong, even if technically not illegal, which contributes to what Garland describes as the “culture of control”, where social anxieties (gender, sexuality, immigration, economic precarity) are managed through an increase of punitive and exclusionary policies. In a way this echoes the interview data, where participants described a sense of being constantly watched and judged, apart from delegitimized, by the systems that claim to protect them.

Altogether, these theoretical paradigms provide a multidimensional point of view to be able to understand the lived experiences, institutional dynamics and representations in public discourses of sex workers in both Sweden and Denmark. Intersectionality helps to reveal how race, gender, migration and economic status shape vulnerability; Foucault explain how discourse and law produce sexual subjects; Cohen and Goffman show how stigma and panic can create deviant subjects; and Garland situates sex work and its processes within a broader view on state control. Applied collectively, these theories allow for an examination beyond simple debates about legality and morality. It explores how power, discourse and resistance, for example, operate at multiple levels by shaping policies and recognition of voices.

## **6. Analysis**

### **a. Discourse Analysis**

This analysis incorporates selected international and national policy documents that employs discursive influence on the framing of sex work at both foundations and governmental levels.

This section is divided in two parts: documents that support sex worker’s rights and documents that align with an abolitionist position. These texts are treated not only as sources of information but as discursive actors – producing, legitimizing and challenging narratives about sex work, agency, health and state responsibility. Drawing on feminist discourse analysis and principles of institutional ethnography (Murray, 2022), the analysis explores how such texts, discourses and institutional practices frames sex workers, state obligations and legal responsibility and how they interact with national regulatory regimes. It involves tracing linkages between lived experiences and broader institutional structures, recognizing that such documents play an active role in shaping what can be said, known and done.

The discourse analysis draws on 14 policy and advocacy texts publish between 2012 and 2025. These include international human rights statements, community advocacy documents, abolitionist policy briefs and research reports. The materials were selected for their explicit

framing of sex work and their relevance to public policy discourse in Europe. These documents are presented in the following table, as to add transparency and clarity, in alphabetical order depending on the organization name:

Table 1. Overview of Analysed Policy Documents

Reference Code	Organization	Document Title	Key framing
Amnesty2016	Amnesty International	Amnesty Policy on Sex Work (2016)	Sex work as labour
CAP2025	Coalition for the Abolition of Prostitution International	A Grassroots Abolitionist Approach (2025)	Survivor-centred
ESWA2022	European Sex Workers Rights Alliance	Myth-Busting the Swedish Model (2022)	Critiques criminalization, centring lived experiences
ESWA2024a	European Sex Workers Rights Alliance	Annual Report 2023 (2024)	Rights-based advocacy
ESWA2024b	European Sex Workers Rights Alliance	Exposed From All Sides (2024)	Police harm, anti-carceral
EWL2017	European Women's Lobby	18 Myths on Prostitution (2017)	Moral framing, anti-sex work
EWL2022	European Women's Lobby + Brussels' Call	Towards Equality (2022)	Abolitionist feminism, criminalization
Fuckförbundet2019	Fuckförbundet + Global Network of Sex Work Projects	20 Years of Failing Sex Workers (2019)	Migration, deportation, systemic exclusion
NSPW2024	Global Network of Sex Work Projects	Let's Talk About Sex (2024)	Terminology, linguistic justice
KAFA2014	KAFA (enough) Violence & Exploitation	Exploring the Demand for Prostitution (2014)	Demand as male deviance, punitive logic

NMN2023	Nordic Model Now!	What Are We Talking About When We Talk About Prostitution (2023)	Anti-sex work, emotive metaphors
Sverige2023	Sveriges Kvinnoorganisationer	New Survey: Sex Purchase in Sweden & Germany (2023)	Policy success via street prostitution decline
WAVE2024	Women Against Violence Europe	A Life Free from Violence (2024)	Prostitution = violence against women
WHO2012	World Health Organization	WHO Guidelines (2012)	Public health, decriminalisation

The global discourse surrounding sex work is a complex, intertwined and multifaced space with diverse perspectives, ideologies and lived experiences. The core question of this debate is whether should sex work be recognized as legitimate labour or is it inherently a form of exploitation that should be abolished? This analysis draws from a range of influential texts produced by human rights organizations, feminist coalitions, sex worker-led advocacy groups and international policy bodies and explore the two dominant frameworks that are shaping conversations about sex work.

### **i. Abolitionist Frameworks on Sex Work**

Abolitionist frameworks assert that sex work is intrinsically exploitative, incompatible with human dignity, and intertwined with systemic gender inequality. Central to this discourse is the depiction of sex workers not as autonomous individuals or laborers, but as passive victims of patriarchal violence. These texts construct a singular ethical framework in which prostitution is characterized as a violation of women's rights to be eliminated rather than regulated or decriminalized.

The European Women's Lobby (EWL2022), notably in its report “Towards Equality”, contends that “prostitution is both a cause and result of gender inequality”, suggesting that genuine equality is unattainable while sex work persists. It dismisses alternative feminist or harm reduction models and instead presents abolitionist assertions as universal truths. The “18 Myths on Prostitution” (EWL2017) illustrates this by organizing the text around a myth/truth

dichotomy. This rhetorical approach hinders discussion and strengthens a division between “true” feminists and those seen as complicit in exploitation.

Women Against Violence Europe (WAVE2024) also constructs prostitution as indistinguishable from violence. In “A Life Free from Violence”, the report adopts a “protection and rescue” framework that renders sex workers voiceless and reliant on state intervention. It avoids differentiating between voluntary and forced sex work or between different legal systems, thereby simplifying diverse realities into a singular narrative of harm. The report includes passive phrasing – i.e., “women who are subjected” – which reinforces the image of sex workers as silent, suffering figures, resonating with Cohen’s (1972) concept of moral panic where sexual labour becomes a site for projecting cultural fears and anxieties.

CAP International’s (2025) “A Grassroots Abolitionist Approach” utilizes humanitarian and trauma-centred rhetoric while simultaneously excluding current sex workers advocating for rights-based solutions. The “survivor” is celebrated only once they have left sex work, creating a distinction between those deemed deserving of support and those still in the industry, who are portrayed as either misguided or victimized. The repeated use of terms such as “freedom”, “dignity”, and “genuine support” constructs a moral universe where only abolition holds ethical legitimacy. Structural causes – like poverty, racism, or immigration policy – are downplayed in favour of individual transformation and exit.

Nordic Model Now! (2023) heavily emphasizes language as a tool of moral governance. In “What Are We Talking About When We Talk of the Sex Industry?” the organization explicitly states that terms like “sex work” are ideological distortions that legitimize exploitation. The report describes prostitution using emotive analogies such as “rape for profit” and “sexual slavery”, collapsing distinctions between consensual sex and trafficking. The discursive aim is not to provide policy nuance, but to control the terrain of meaning itself – positioning abolitionist language as morally correct and delegitimizing all alternatives.

In Kafa’s report “Exploring the Demand for Prostitution”, the focus shifts toward male clients as the primary instigators of exploitation. Demand is labelled as a form of “patriarchal entitlement”, and clients are portrayed as threats to public order and morality. This shift redirects responsibility towards men but continues to exclude sex workers as political actors. The report uses imagery of disease – “a virus” – and moral decay, framing sex work as both a public health and cultural crisis.

Across these texts, abolitionist discourse heavily relies on carceral feminist logic, wherein safety is equated with prohibition, and justice is fulfilled through the criminalization of clients, third parties, and sex work infrastructure. In line with Foucault (1978), these frameworks represent a form of moral governance in which sexuality is not just regulated but disciplined, especially along lines of race, gender, and migration.

Crucially, structural intersectionality is either missing or significantly underdeveloped. As Crenshaw (1989, 1991) cautioned, when feminism homogenizes the female experience, it disregards the complexities of interconnected vulnerabilities. None of the abolitionist documents examined adequately address the lived experiences of trans women, migrants or racialized sex workers. When these groups are mentioned, it is usually to emphasize their vulnerability, not to acknowledge their political agency or structural oppression.

Hence, the logic of exclusion emerges as a defining rhetorical tactic: only those who fit the victim-survivor-exit narrative are given recognition, while others are made invisible or portrayed as barriers to feminist progress. This selective visibility supports a normative state feminism, where criminalization is framed not only as essential but as an indicator of moral and democratic advancement.

## **ii. Sex Work-Led and Decriminalisation**

In contrast, discourses led by rights-based approaches and sex worker advocacy groups frame sex work as a legitimate form of employment, positioning sex workers as knowledgeable agents of political awareness and social transformation. These approaches are rooted in principles of human rights, personal autonomy, public health, and intersectionality.

The European Sex Workers Rights Alliance (ESWA2024a) spearheads this viewpoint, particularly highlighted in its 2023 Annual Report and “Exposed From All Sides” (ESWA2024b). These reports challenge narratives that isolate sex work from broader labour struggles and instead connect it to systemic issues like the gig economy, racially motivated policing, and housing insecurity. ESWA asserts that the criminalization of any consensual sex work aspect is a violation of human rights. Emphasizing lived experience, community-led research, and empirical evidence, the reports position sex workers as rights-bearers and political subjects.

In “Myth-Busting the Swedish Model”, ESWA2022 critiques the Nordic Model, arguing that the criminalization of clients, while supposedly protective, actually exacerbates violence and

stigma. The report employs a “myth vs. reality” framework to dismantle abolitionist claims, rejecting the victim/perpetrator binary and revealing how such models, contrary to what they claim, they perpetuate structural violence.

Fuckförbundet’s (2019) “Twenty Years of Failing Sex Workers” offers a Swedish perspective on similar issues, drawing on testimonies from sex workers about evictions, deportations, and child custody losses under the 1999 Sex Purchase Act. These accounts challenge the notion that the state provides protection, instead portraying it as a source of harm. As one testimony states: “The law does not provide us with protection – it is actually driving us further apart”. This rejection of shame and stigma reflects Goffman’s (1963) theory, replacing the marginalized, stigmatized individual with a collective, defiant voice.

Global entities have reinforced this perspective. The World Health Organization’s (WHO2012) guidelines identify criminalization as a significant barrier to HIV prevention, care and treatment, thus advocating for harm reduction, non-discriminatory healthcare services and rights-based legal reform. The text emphasizes that “laws, policies and practices that criminalize sex work reduce access to health services”. Similarly, Amnesty International (2016) calls for full decriminalization, arguing that punitive measures violate international human rights standards. The policy clearly differentiates between consensual sex work and trafficking, urging the state to end interventions that disempower rather than protect.

NSWP’s (2024) “Let’s Talk About Sex” further underscores the importance of language and framing. The report critiques the stigmatizing impact of terms such as “prostitution” and promotes “sex work” as an affirmation of autonomy and labour rights. The text highlights how language affects access to funding, services, and political legitimacy. It also addresses how media and policy discourse often rely on sensationalism, moralism and removes the lived experience of those affected, in this case, sex workers.

Intersectionality is a core principle across these documents. ESWA and NSWP emphasize how factors such as race, gender identity, disability and migration status influence legal vulnerability and working conditions. For example, ESWA2024b documents how law enforcement disproportionately targets migrant and racialized sex workers, making them highly visible to police but invisible in policy. These approaches avoid homogenization, asserting that empowerment must be defined by sex workers themselves, not imposed through state regulation or rescue narratives.

These movements are also highly collaborative. As articulated in ESWA's work, advocacy led by sex workers intersects with labour rights, migration justice and LGBTQ+ movements. This reflects a broader shift from individual victimhood toward coalition-based resistance and structural transformation.

### **iii. Discursive Conflict**

Institutional power is not evenly distributed across these discourses. Frequently, abolitionist narratives are adopted by governments, EU institutions, and major feminist non-governmental organisations. Individuals profit from the moral advantages associated with portraying themselves as victims and from their alignment with broader trends in policy that focus on punishment. In the case of rights-based discussions, despite their increasing influence, the discussions still remain excluded from official settings. Power, as Foucault (1989) notes, simultaneously generates resistance. A growing body of literature published by sex workers counters the prevailing terms of the debate. These texts advocate for policy reform while redefining the concepts of work, care, safety and rights.

This section demonstrates that policy is not solely a reaction to social issues, but rather serves as a means of determining their nature. The sex worker serves as a battleground for ideological disputes between feminist ideologies and the criminal justice system, as well as between the pursuit of health and the imposition of punishment, and between maintaining silence and amplifying voices.

This discourse analysis uncovers not only conflicting perspectives on sex work, but also the existence of two fundamentally ingrained systems of interpretation. The abolitionist movement portrays sex workers as vulnerable, injured individuals whose presence undermines traditional values and social norms. And in contrast, the rights-based field that portrays the sex worker as a politically active individual seeking recognition, access to resources and respect. These discursive frameworks have significant and extensive implications. The way laws are written, the structure of services and the formation of public opinion are all impacted by them – they decide whose knowledge is considered valuable and whose opinions are given a platform. Discourse is essentially a manifestation of power at work, instead of a mere reflection of it.

This research demonstrates that the controversy surrounding sex work extends beyond legal and moral debates – it fundamentally revolves around issues of knowledge and understanding. Both sides raise legitimate concerns about the need to prevent exploitation and trafficking, the importance of body autonomy and the imperative to ensure safety and dignity. Nevertheless,

as the narratives reveal, language is not neutral and it shapes realities while at the same time determines who gets to speak and be heard. Therefore, the core of the dispute lies in the creation of knowledge, the power to set the definition and the freedom to express opinions. Until sex workers are acknowledged as equal contributors to the discussion, policy will continue to be unjust and incomprehensible to those it impacts most.

### **b. Thematic Analysis**

This section presents a thematic analysis of the interview data that was collected from sex worker-led organizations in Sweden and Denmark. The analysis was conducted manually, following an inductive coding process that aimed to identify recurring patterns, themes and subthemes, and underlying discursive meanings.

The thematic analysis is divided into three parts: legal frameworks and safety; stigma and public attitudes; and organizational strategies. Drawing on theories of stigma, social control and intersectionality – primarily – it is analysed what participants said and how their experiences were shaped by the legal and ideological context. This structure represents both the thematic coding and theoretical concerns guiding the study, which allows for a more contextualized comparison between Sweden and Denmark.

#### Legal frameworks and policy implementation

Sweden and Denmark operate under distinctly different legal frameworks regarding sex work, with significant implications for how sex workers experience the law in their everyday lives. And these legal regimes do not only regulate behaviour but they produce meanings, subject positions and conditions of (il)legitimacy.

In Sweden, the Sex Purchase Act (1999) criminalizes the buying of sexual services but not the selling. The law was designed to target the demand, framing sex workers as victims and buyers as perpetrators. However, interviews with Red Umbrella Sweden (RUS) reveal that, in practice, sex workers themselves are still penalized. As SE1 said,

“It doesn’t matter if the law says it’s the buyer who is the criminal. In practice, the whole community looks at the worker as the problem.”

This quote exposes the discursive contradiction between the law’s intent and social enactment. It shows how legal discourses are performative, not just descriptive, how they shape public attitudes and institutional behaviour.

This suggests a contradiction in Swedish policy: while sex work is not illegal per se, the associated conditions of working in the industry becomes grounds for punitive action. Thus, the legal framework criminalizes sex workers through secondary mechanisms – eviction, loss of child custody and intensified surveillance. As mentioned by SE1:

“So for us and it's also a lot of people are scared of being outed, like, if you're a sex worker because if your regular know job knows that you're a sex worker, you might lose that job or you might lose your kids or, you know, all the problems around being a sex worker.”

Foucault's theory of governmentality is useful: criminalisation is not direct but works through dispersed institutional practices that regulate through moral classification and suspicion. As SE1 recounted:

“I lost my job at the grocery store because they didn't want someone like me working there...and I'm too afraid to see clients in hotels because staff are trained to report us”.

In the contrary, Denmark has no legislation criminalizing the buying or the selling of sex. While certain aspects – third-party profiteering, brothel owning or street sex work near schools – are regulated, the general legal environment is less hostile. According to DK1 from Sexarbejdernes Interesse Organisation (SIO), “We are not criminalized here, so we can work more openly, and many of our members feel safer reaching for help.” This highlights a key difference: in Denmark, sex workers can operate with more legal clarity and less fear of being punished for their activities. This shows how legality facilitates visibility, practical safety and institutional dialogue, that opens space for sex worker agency and legitimacy.

However, this does not mean that Danish sex workers enjoy full protection or equality, as DK1 continues, “We pay taxes, but we don't have the same rights as other workers. It's legal, but it's not treated as a real job” and “You're tolerated, but never accepted. That's a difference between legality and real safety.” Regulation is uneven, and those working outside formalized structures can still face legal ambiguity, especially in relation to migration. It reflects a condition of legal liminality (Scouler & O'Neill, 2017): legality without legitimacy, where workers are tolerated, regulated and “included” only in administrative terms, but denied full recognition as a legitimate labour or entitled to full rights. They exist within a grey zone.

Another difference is how the legal systems view agency. Swedish law, influenced by radical feminist ideology, constructs all sex work as inherently exploitative. The resulting legal discourse removes agency from sex workers, portraying them as passive victims in need of rescue. The framing is echoed in political rhetoric and media representations. In contrast,

Danish policy does not systematically negate the possibility of agency. Organizations like SIO actively promote the recognition of sex workers as workers, not victims, allowing for more complex identities to emerge in public discourse.

Safety is a major concern for sex workers in both countries, but it manifests differently. Either way, safety is mediated through legality, how is the relationship shaped with institutions.

In Sweden, the criminalization of clients leads to indirect policing of sex workers. As SE1 points, “The law pushes everything underground. It doesn’t eliminate sex work; it just makes it harder to work safely.” SE2 also adds:

“When clients are criminalized, meetings happen faster and in more isolated places because clients don’t want to be seen. This leaves workers with less time to assess if the situation is safe.”

They both add that police frequently monitor online ads and street workers. Here, moral governance becomes spatial governance – by pushing work into hidden, there are less secure spaces. These narratives show how policy logics are built on symbolic morality that continues to produce material harm.

It creates a climate of fear and reduces sex workers’ willingness to report crimes. If a client assaults a sex worker, they may be reluctant to call the police, fearing consequences as eviction or deportation. In practice, it means that they are often unprotected by the systems that claim to help them. Particularly, migrant are more vulnerable, as Swedish police routinely cooperate with migration enforcement, and with an increase of surveillance it means that it could result in deportation. As said, by both Swedish interviewees, SE1, “If you’re a migrant, you can be evicted or deported just for being suspected of selling sex, even though is technically not illegal”; and SE2, “Being a migrant and a sex worker means you’re visible to the police, but invisible when you need protection.”

These experiences illustrate intersectional state violence, where race, migration status and liminality converge. Crenshaw’s concept of structural intersectionality is useful: harm emerges at the point of institutional overlap, as for example, sex work + migration policing.

In Denmark, while sex workers still experience stigma and marginalization, there is comparatively a greater trust in institutions. This has enabled harm reduction initiatives like the Red Van Project, where is provided direct outreach, is distributed supplies and refer sex workers to health or legal services without the fear of law enforcement interference, as they said, “It’s not perfect, but at least we can build working relationships with the police and

municipality.” This shows how discursive position shapes the possibility of protection. When sex workers are seen as workers rather than deviants, institutions can actually engage in a non-punitive form and not continuing to cause hostile environments.

That said, safety is still not assured. Street-based sex workers still face harassment and occasional police action, especially in cities that reinforce localized bans or “safe zones”. Moreover, migrant sex workers are more cautious in approaching social services, as because of the lack of residency or work permits, but the legal system still offers more pathways to access health services or legal support. Thus, even though the more restrictive Danish immigration laws, sex workers are less frequently reported to authorities unless they are involved in other criminal cases. To sum up, it can be said it enable a more strategic navigation of the system even if full rights still remain inaccessible.

When talking about intersectionality it is shown how legal and social structures affect differently sex workers based on race, class, migration status and gender. In both countries, migrant sex workers, especially those without EU-citizenship, face greater precarity but the legal contexts reflect how these vulnerabilities are experienced. In Sweden, the combination of criminal and immigration enforcement produces fear and exclusion. SE1 notes, “You can be deported just for being suspected...”, SE2 adds, “here are your options, we are going to deport you, or you can say you're a victim of sex trafficking”. These narratives reflect the logic of moral panic and control (Cohen, 1972; Garland, 2001): migrants are constructed as folk devils, not beneficiaries of protection. The symbolic frame of the law overrides its formal safeties. Although in Denmark immigration law is still restrictive, the legal framing of sex work does not automatically trigger institutional suspicion, giving migrant sex workers a slightly bigger room to navigate risk.

Nonetheless, exclusion also persists through other axes: class and gender in particular. In the case of gender identity, trans sex workers, in both countries, report facing unique forms of stigma and violence. Swedish paternalistic law imagines primarily cisgender women as victims, making trans sex workers even more invisible in policy debates, by contrast in Denmark, organizations have more flexibility to advocate for trans-inclusive services and protections, although practical and material barriers remain. Class plays a subtler role, but still important. In both countries, economically marginalized sex workers are more likely to engage in sex work under constrained conditions, with limited ability to negotiate or refuse clients. This support the argument that intersectionality must be embedded in legal frameworks, not

added on rhetorically. Policy here fails to consider that layered exclusion replicates harm even if it is well-intentioned.

Intersectionality exposes the layer of exclusion and how they interact with national legal regimes, Swedish policy disproportionately harms those who are already marginalized – migrant, trans people and other racialized communities – while Danish policy, not immune to inequality, provides more institutional spaces to address these overlapping identities.

### Stigma, moral discourse and public attitudes

While both countries exhibit strong social stigmas surrounding sex work, the origins, intensity and institutional reproduction of that stigma vary significantly. In Sweden, stigma is deeply embedded in legal and political discourse, through the legal framework of sex worker as inherently violent and degrading (abolitionist feminist perspective) and sex workers are constructed as victims, erasing their agency and autonomy. As said by SE1, “You’re either seen as victim or as a criminal... there is no space to just be a worker”, and continues “The state pretends to support you, but their idea of “help” always means exit.” This binary leaves little room for sex workers to articulate their own experiences and reinforces their exclusion from policy discussions and feminist spaces, as well said by SE1, “The feminist groups working on this issue don’t include us. They talk about us, not with us.”

This moral framework feed into broader societal attitudes. Media discourse in Sweden frequently links sex work with human trafficking, even when discussing consensual adult work. As SE1 notes, “Media love the trafficking story. They rarely ask sex workers what they think”. The consequence is a moral panic (Cohen, 1972), in which particular groups – in this case, sex workers – are constructed as folk devils, embodying broader anxieties and portraying a threat to national values, female dignity and social order. Besides, these narratives facilitate a symbolic governance (Garland, 2001) in which sex work becomes a scapegoat for larger concerns about social order and it helps to justify state intervention in the name of protection.

The effect is a form of institutional stigma (Goffman, 1963) that operates not only culturally but structurally too. Swedish sex workers reported being surveilled, excluded from policymaking spaces and subjected to punitive social responses. As mentioned by SE1 “Politicians use us to look like they are fighting for women’s rights, but it’s about control.” This quote links directly to Foucault’s concept of biopolitical governance, where the state does not merely prohibit, but seeks to shape the conditions of life by deciding who is “deserving” of rights, voice and protection. The result minimizes the discursive field: organizations like RUS

are excluded from parliamentary process that affects them and sex workers rights advocacy is delegitimized. “We are either ignored or vilified”, SE1 said, “Policymakers don’t invite sex workers to testify, only academics or NGOs that support the law”. This marginalization reinforces the idea that sex workers are not credible political actors, that their lived experiences are discounted because they are either corrupted or irrelevant.

On the contrary, in Denmark, does not frame sex work as a moral crisis to the same extent. While stigma certainly exists, is more diffuse, as DK1 points out “Even in Denmark, people hide their work from family. It’s not as harsh, but stigma is still real.” The absence of moral panic or rescue narratives as dominant discourses allows for a more nuanced understanding of sex work, including perspectives that recognize it as a form of labour and rights-based perspectives. However, this does not eliminate stigma, sex workers may still experience shame or social exclusion, but the public discourse shifts from a moral condemnation to more subtle social prejudices.

Furthermore, Denmark organizations have more space to challenge stigma publicly, therefore the discursive space allows for resistance. They use social media, public workshops and policy campaigns to shift perceptions, as mentioned by DK1 “we use workshops and social media to challenge stereotypes”. This inclusion in formal consultations – with unions, municipalities and health agencies – represents a partial institutional recognition of their political legitimacy, as DK1 continues:

“We’re not always listened to, but at least we’re at the table. We’ve worked with unions, health agencies and some municipalities”,

it offers a more open discursive space, organizations are invited to consult on policy issues and participate in roundtable discussions- Thus, media representation is more varied, highlighting the voices and diversity of sex workers themselves, despite the fact that trafficking and exploitation are still prominent themes. This openness allows for a bigger pluralism in how sex work is understood and a bigger space for negotiation and policy influence. While dominant narratives still stigmatize or simplify the issue, there is less active silencing of nonconforming views. Organizations can define sex work as labour without being accused of endorsing violence, a difference that significantly affects the ability of sex workers to organize, advocate and shift public perception.

Contrary to Sweden where organizations often report being marginalized or accused of “supporting trafficking” if they advocate for sex workers’ rights. There is a lack of

representations as a product of policy framework, where sex workers are lacking agency and therefore not credible to participate in political debates that affects them. In Sweden is more seen as they have minimal voice in shaping the laws that governs their lives, and organizations like RUS are excluded systematically from political dialogue, as said by SE2:

“the media is just really willing to parrot whatever police say or whatever lawmakers say [...] an article recently came out that a woman was being prosecuted for sex purchase [...] and I remember this article really portraying this sex worker as, like, this victim.”

It represents sex work through the lens of rescue, victimhood or crime. Major newspapers and public broadcasting represent the stories about sex work with an overwhelming focus on trafficking and criminality. Organizations that support sex workers' rights are frequently accused of being “pro-prostitution” or complicit in exploitation. Therefore, this discursive makes it nearly impossible to advocate for harm reduction or decriminalization without being delegitimized.

Finally, this points out a critical difference in how ideological framings produce different possibilities of resistance: in Sweden, as a result of the opposing dominant narrative there are professional and social penalties and reinforcing exclusion, while in Denmark, public advocacy is more permissible, even if it is still controversial, leaving room for resistance and reform. It contrasts directly with Foucault' theory of discourse and power: in Denmark they can be freely construct themselves as speaking subjects, while in Sweden, the dominant discourse actively denies them that subjectivity. In this way, stigma is not just a social prejudice but a regulatory discourse that shapes who can speak, who can be heard and who is worthy of state protection. Even so, it is reinforced through both media and law, and it functions as a form of epistemic violence – erasing sex workers' legitimate knowledge and experiences.

### Organizational strategies and activist responses

As mentioned, organizations in Sweden and Denmark adopt very different strategies in response to their legal and political environments. In Sweden, advocacy takes the form of discursive resistance against well-established ideological paradigm that equates sex work with trafficking and victimhood, and where organizations like RUS describe their work as a struggle for recognition in a hostile climate, SE2 stated “We have to constantly explain why sex workers should have rights, why we're not promoting trafficking. It's exhausting.”

The strategies from RUS focus on harm reduction, legal aid and raising awareness through digital campaigns and international solidarity. These strategies function as acts of symbolic defiance given the limited local political opportunities. Because of the hostile political climate, these organizations face funding challenges or political backlash, forcing them to work cautiously, often avoiding the term “decriminalisation” to prevent being dismissed or attacked. Their legitimacy is constantly challenge, forcing them to justify their existence and right to participate in public debate.

The struggle for legitimacy is also a product of Garland’s (2001) theory of social control, which shows how modern states maintain order through punishment and vi dispersed systems of regulation and exclusion. Therefore, in Sweden’ case, sex workers are not outlawed, but they are discursively regulated through moral narratives that define them, for example, deviant. Their exclusion from policymaking is not always explicit but still occurs, as mentioned in the section above, which reflects a broader system of control where social inclusion is conditional on aligning with state-approved narratives, in this context, storylines within victimhood and exit of the industry.

In Denmark, the organizations openly advocate for sex workers’ rights, attend public hearing and build partnerships with health services or local government. As Red Van notes\_

“We have good relationships with health services and even some sympathetic police officers. That helps us to do our job better.”

Their work includes distributing condoms, offering legal workshops, organizing peer-led events and advocating for labour rights. Nevertheless, they still are not free from challenges such as public stigma, funding uncertainty and internal debates about how best to represent diverse sex worker communities; but they have greater discursive and institutional access. They still have the ability to engage with public agencies and unions, that reflects a higher degree of recognition, and allow them for a collaborative model of governance rather than survival, they can operate and challenge policy constructs, allowing them for more innovation and coalition-building by engaging in participatory dialogue with institutions.

Ultimately, this contrast illustrates how the discursive environments condition the possibility of resistance. In Sweden, organizations operate in a climate of suspicion and harm-reduction advocacy can be misconstrued or misunderstood as a form con complicity in exploitation and trafficking. Instead, Denmark allows for a more open dialogue, enabling sex worker-led

organization to act as agents of policy innovation. These different conditions fundamentally shape how sex workers can organize, build coalition and assert their rights in the public sphere.

## **7. Discussion**

The discussion explores how legal regimes, public attitudes, and institutional narratives construct sex workers either as victims in need of rescue or agents of rights-based resistance. The analysis shows that these competing discourses are not abstract or symbolic alone, but that they have material consequences. They shape whether sex workers are protected or punished, included or excluded, recognized or erased. Ultimately, this reveals that current policy frameworks are often unjust and incomprehensible to those they are meant to govern.

Abolitionist discourses are powerful actors in the governance of sex work. Texts produced by organizations such as the European Women’s Lobby (EWL), WAVE, CAP International, and Nordic Model Now! mobilize a framework where prostitution is indistinguishable from gender-based violence. These documents construct sex work as a moral and legal crisis and rely on rhetorical binaries – victim/perpetrator, rescue/complicity, truth/myth – that reduce sex workers passive and voiceless. EWL2017 exemplifies this tactic, presenting its abolitionist stance as factual and beyond debate.

Moreover, the discourse of abolitionism excludes sex workers from political participation. RUS reported being excluded from consultations, portrayed as illegitimate or as “pro-trafficking” for advocating harm reduction or decriminalization. This exclusion reflects epistemic violence—a systematic denial of marginalized groups’ capacity to produce knowledge about their own lives. In Sweden, feminist NGOs and state actors dominate the discursive field, reinforcing a singular truth about sex work that leaves little room for alternative understandings. This research set out to explore how policy frameworks, public discourse and societal attitudes shape the experiences of sex workers in Sweden and Denmark, how organizations working in this space interpret and respond to these dynamics. Drawing on a comparative analysis of legal contexts, institutional discourse and semi-structured interviews with interviews supporting sex workers, this chapter put together the empirical findings and theoretical insights to unpack the complex, frequently contradictory, ways that sex work is understood, governed and contested in both countries.

One of the clearest contrasts emerging from the data is how legal frameworks function symbolically and materially to shape sex workers’ experiences of safety, legality and social inclusion. In Sweden, the criminalization of clients under the Nordic Model (Sex Purchase Act,

1999) constructs sex workers as passive victims in need of state protection. Despite the intentions to avoid criminalizing the seller, interview participants consistently described how the law results in increased surveillance, eviction threats and fear of deportation for migrant workers. The consequences of such legal ambiguity reflect Crenshaw (1989) terms “structural intersectionality”, where formally neutral policies exacerbate exclusion for already marginalized groups – in this case, migrant, racialized or trans sex workers.

This analysis supports Foucault’s theory of governmentality (1978), wherein law acts not just as coercive power but as a discursive tool that governs by shaping norms, identities and institutional boundaries. By criminalizing the demand while framing sex workers as “in need of exit”, Sweden produces a moral regime that regulates sexuality, reinforces traditional gender norms and positions the state as a moral guardian. The law operates symbolically, creating what one participant described as “an idea of help that always means you have to leave” (SE1). This echoes Foucault’s insight that power is most effective when it induces subjects to regulate themselves, even in the absence of direct punishment.

Denmark, by contrast, offers a partial decriminalization model, where sex work is neither criminalised nor legally fully recognize as formal employment, which leads to what Scouler & O’Neill (2007) call a state of “legal liminality” – workers are taxed yet denied labour protections. While interviewees from Danish organizations noted greater access to support services and a somewhat more open public dialogue, they also highlighted persistent legal and social contradictions. This points to Garland’s (2001) concept of social control, in which legal frameworks produce categories of inclusion and exclusion not only through direct sanctions, but via subtle norms that shape access to social goods like healthcare or housing.

As the discourses centred on rights – endorsed by entities like ESWA, NSWP, Amnesty International, and the WHO – sex workers are portrayed as political agents, employees and community leaders. These materials emphasize autonomy, labour rights, harm reduction and intersectionality. Reports such as ESWA2024a and ESWA2024b, directly refute abolitionist narratives, utilizing data, personal stories and institutional critiques to underscore the violence engendered by criminalization.

The findings also emphasize the enduring power of stigma, both social and institutional. Following Goffman’s (1963) theory, sex workers in both countries face symbolic exclusion – marked by moral judgment, legal restrictions and denied agency. In Sweden, stigma is institutionalized through feminist abolitionist narratives that portray sex work as inherently

violent, reducing sex workers to either victims or criminals, but never legitimate workers. This binary framework silences sex worker voices in feminist debates and public policy, a dynamic further reinforced by media that frequently equates all sex work with trafficking. Such discursive practices mirror Cohen's (2002) concept of moral panic, wherein marginalized groups are constructed as threats to national or moral order. The figure of the sex worker becomes a "folk devil" against which the nation reaffirms its gendered and racial boundaries.

In Denmark, while stigma is also present, participants reported more opportunities for advocacy and dialogue. Organizations like SIO and the Red Van Project are not only included in policy discussion but also actively reshaping them through harm reduction work and peer-led services.

Organizational strategies reflect these contrasting environments. In Sweden, advocacy is shaped by defensive resistance. Organizations like RUS described working "cautiously" and often avoiding explicit demands for decriminalisation to avoid backlash. The dominant policy discourse – heavily shaped by anti-trafficking frames – leaves little room for alternative voices. As shown in the analysis of policy documents, such as WAVE and NMN, sex workers are largely absent as stakeholders. Their voices are replaced by institutions that frame them as victims of male violence or as irrational actors incapable of agency.

In Denmark, organizational responses are more expansive. The Red Van Project and SIO engage in public workshops, legal education and media outreach, contributing to a gradual shift in public perception. Nevertheless, barriers remain. As DK1 reflected, "policy only helps on paper if the stigma and discrimination aren't addressed too". This tension illustrates how partial legal reform, without cultural and institutional change, cannot fully dismantle the stigma that limits sex workers' rights and recognition.

Thematic findings from interviews also highlight how intersectionality operates on the ground. Migrant sex workers, in particular, face compounded risks. In Sweden, migrants can be evicted or deported for merely being suspected of selling sex. In Denmark, the absence of legal employment protections means that even regularized migrants face heightened vulnerability. These experiences underscore Crenshaw's (1991) argument that systems of oppression are not additive but intertwined. Intersectionality allows us to see how race, gender, immigration status and class are not simply "contexts" but active forces shaping who is visible, who is legitimate and who is expendable within legal and social systems.

Public discourse, as analysed in both policy documents and interviews, functions as a powerful tool in shaping institutional responses. Abolitionist publications such as those by the EWL routinely frame sex work as inherently harmful, omitting distinctions between consensual and coerced sex work. Meanwhile, pro-rights organizations like ESWA and Amnesty International counter these narratives by emphasizing the agency of sex workers, the harms of criminalisation and the need for legal reform. This discursive contestation reflects what Foucault (1982) called a “regime of truth” – where knowledge production is inseparable from power. Institutions and policies do not simply reflect social realities, they create them by legitimizing certain voices and silencing others.

A particular important dimension is how both legal frameworks and public discourse construct the sex worker subject. In Swedish documents aligned with the Nordic Model, the sex worker is depicted as a wounded figure – female, traumatized and in need of rescue. This narrative, while intended to protect, denies autonomy and reinforces paternalism. In Danish discourse, there is more recognition of sex workers as workers, yet this recognition is partial and often contingent upon respectability or visibility in advocacy. The occupational value of sex work, as expressed in the work of Huglstad et al. (2022), remains contested: sex workers are simultaneously required to demonstrate harm (to receive aid) and prove autonomy (to advocate for rights).

Finally, both interview and document data indicate that the state plays a central role in regulating not only legality but also legitimacy. Policies and discourses are not neutral responses to an existing problem but are productive – they define what counts as sex work, who qualifies as a victim and what forms of help are “appropriate”.

Exit programmes, such as those described in Denmark’s municipal policies (Karlsson, 2023), aim to transform sex workers into “wished subjects” who desire to leave the industry. Those who do not conform to this narrative are rendered irrational or underserving of aid. As Tendler (2022) notes, this approach turns deportation into a form of “rescue”, especially for migrant sex workers, reinforcing a rescue industry that is more invested in symbolic salvation than in structural change.

To sum up, this discussion demonstrates that legal frameworks in both countries fail to fully protect or empower sex workers. While Denmark’s partial decriminalization model offers more space for advocacy and safety, its refusal to recognize sex work as legitimate labour results in continued marginalization. Sweden’s Nordic Model, though framed as feminist progress,

enforces a moral economy that infantilizes and punishes those who resist its binary framing of victimhood and exit. Across both contexts, intersectional inequality, stigma and institutional silencing persist.

For sex workers and the organizations that support them, the struggle is not only for better laws but for discursive legitimacy: to be seen not as problems to be solved, but as people with rights, voices and complex lives. As Foucault reminds us, power is not simply repressive but productive – it shapes who is allowed to speak, whose suffering counts and whose freedom is possible.

## **8. Conclusion**

This study's scope was to examine and compare the legal and social frameworks that regulates sex work in Sweden and Denmark and assess how these systems impact sex workers' safety, legal rights and social inclusion. The research reveals the deeply intricated nature of sex work policy, its interaction with broader structures of power and how it shapes the social and legal position of sex workers (Crenshaw, 1991; Foucault, 1978; Garland, 2001).

In Sweden, the Sex Purchase Act (1999) criminalizes the purchase but not the sale of sex. It is rooted in a radical feminist perspective that views all sex work as inherently exploitative and patriarchal (Ekberg, 2004; Levy & Jakobsson, 2014). Proponents argue that the policy reduces demand and supports equality. However, the empirical findings and testimonies presented in this research suggest otherwise. While the law might have reduced visible street-based sex work (Florin, 2012), it has not eliminated sex work per se. Instead, it has driven the trade underground, making it more dangerous and less visible to social services and harm reduction interventions (Vuolajärvi, 2019). Interviews with advocacy organizations and analysis of policy documents indicate that the criminalisation of buyers has increased the stigma faced by sex workers, reduced their ability to screen clients and led to eviction, surveillance and deportations (Fuckförbundet, 2019; ESWA, 2021). Despite being decriminalized in theory, sex workers still encounter institutional exclusion and systemic violence. The Swedish model, far from being a tool for liberation, often enforces state control and moral judgments through symbolic governance that constructs sex workers as victims that lack autonomy (Garland, 2001; Goffman, 1963).

Denmark's model, legally more permissive, is troubled with contradictions. Sex work between consenting adults is legal, but third-party involvement and brothels are criminalized (Bjønness, 2012; Groes, 2022). Sex workers are taxed but not granted labour protections or access to social

benefits. Intersectionality is indispensable. The experiences of sex workers are not uniform – they are shaped by race, gender, sexuality, legal status and class (Crenshaw, 1989, 1991). Migrants, especially non-EU citizens, come across legal exclusion from sex work and are frequently deported if discovered working in the industry (Karlsson, 2023). Basically, they are subject to both immigration law and sex work law, which leads to compounded vulnerabilities and legal precarity (Krusi et al., 2012).

While some harm-reduction services exist, they are unevenly distributed and usually conditional (Stormhøj et al., 2015). The welfare system operates through moral merit criteria that exclude those seen as deviant from acceptable norms (Danna, 2012). Danish sex workers are caught in a liminal space: simultaneously legal yet stigmatized, acknowledged yet unprotected.

What emerges from this comparative analysis is that both models, despite their differences, reinforce structural harm against sex workers. Whether is through the symbolic criminalisation of buyers in Sweden or the legal grey zones of Denmark, sex workers are rarely afforded the rights and protections that comes with a full labour recognition (Rekart, 2005; Sanders, 2005). Legal frameworks continue to function through the logic of control, moral regulation and risk management rather than justice.

The discourse analysis also highlights how policy documents – especially from abolitionist organizations – portrays sex workers as passive victims (EWL2015, CAP2025). These narratives erase sex workers' agency and position them as “problems to be solved” instead of stakeholders to be consulted (Cohen, 2002; Foucault, 1982). In contrast, sex worker-led organizations – such as RUS or SIO – present alternative discourses that emphasizes autonomy, labour rights and decriminalisation. These groups advocate for policies that are grounded in lived experience, harm reduction and social justice (NSWP2024; Amnesty2006).

The thematic analysis of the interviews revealed that participants across broh countries have experiences institutional harm, surveillance by police and social services and struggled with access to healthcare, housing and legal protection. They all emphasized the emotional toll of stigma (Goffman, 1963) and exclusionary dynamics that frames sex work as a pathology rather than a profession. Participants also articulated strategies of resistance: from peer-led support groups to public advocacy campaigns that seek to reframe sex work as legitimate labour.

Policies models that fail to incorporate intersectional realities are unlikely to succeed in promoting justice or safety. Both Sweden and Denmark present models that reinforce

hierarchies of worth, exclusion and perpetuates harm. Without addressing the structural inequalities that shapes sex workers' lives – economic precarity, immigration status, racism, transphobia, stigma – policy reforms risk to replicate the harms they try to erase (Rekart, 2005). The findings in this study purpose reimagining sex work policy by: recognizing sex work as labour, provide universal access to social and legal protections and healthcare and including sex worker-led organizations in policy-making.

Policy should shift from control to care, recognize the diversity of sex workers and respect their right to self-determination. Laws must be grounded in evidence, rights and lived experiences of those affected. In both Sweden and Denmark, that means listening to sex workers – not speaking for them.

## **9. Future research**

While this research provides a comprehensive analysis of sex work policy in Sweden and Denmark, it also highlights diverse areas where further research is essential to deepen our understanding of the lived experiences of sex workers and inform future policy developments.

Future research could explore how immigration policy interacts with sex work law to exclude and criminalize migrant sex workers. Besides, more ethnographic and participatory research could capture the strategies migrant sex workers use to navigate risk, seek protection and assert agency in such hostile contexts. Similarly, longitudinal studies could follow how shifts in legislation, enforcement practices or welfare access influence sex workers' conditions over time. And more research is needed on sex worker-led organizing, prioritizing marginalized voices whose stories are either erased or distorted by mainstream media.

To sum up, future research should move beyond abstract legal models and engage directly with the diverse, complex and context-specific realities of sex workers. These gaps call for more empirical, intersectional and participatory research approaches to advance both academia and policy making.

## References

- Archibald, M. M., Ambagtsheer, R. C., Casey, M. G., & Lawless, M. (2019). Using Zoom Videoconferencing for Qualitative Data Collection: Perceptions and Experiences of Researchers and Participants. *International Journal of Qualitative Methods*, 18, pp.1-8
- Bacchi, C. (1999). *Women, policy and politics*. SAGE Publications Ltd.
- Bacchi, C. (2009). *Analysing policy: What's the problem represented to be?* Pearson Education
- Braun, V. & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, 3(2), pp. 77-101
- Bjønness, J. (2012). Between emotional politics and biased practices: Prostitution policies, social work, and women selling sexual services in Denmark. *Sexuality Research and Social Policy*, 9(3), pp. 192–202.
- Cho, S. -Y., Dreher, A., & Neumayer, E. (2013). Does legalized prostitution increase human trafficking? *World Development*, 41, pp. 67–82.
- Cohen, S. (2002). *Folk Devils and Moral Panics* (3rd ed.). London: Routledge.
- Cook, I. R. (2015). Making links between sex work, gender and victimisation: The politics and pedagogies of John Schools. *Gender, Place & Culture*, 22(6), pp. 817–832.
- Cotton, A., Farley, M., & Baron, R. (2002). Attitudes toward prostitution and acceptance of rape myths. *Journal of Applied Social Psychology*, 32(9), pp. 1790–1796.
- Crenshaw, K. (1989). Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine: Feminist Theory and Antiracist Politics. *University of Chicago Legal Forum*, 1(8), pp. 139-167
- Crenshaw, K. (1991). Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color. *Stanford Law Review*, 43(6), pp. 1241–1299.
- Crowhurst, I., Outshoorn, J., & Skilbrei, M. -L. (2012). Introduction: Prostitution policies in Europe. *Sexuality Research & Social Policy*, 9(3), pp. 187–191.
- Crowhurst, I., & Skilbrei, M.-L. (2018). International comparative explorations of prostitution policies: lessons from two European projects. *Innovation: The European Journal of Social Science Research*, 31(2), pp. 142–161.

- Danna, D. (2012). Client-only criminalization in the city of Stockholm: A local research on the application of the ‘Swedish model’ of prostitution policy. *Sexuality Research and Social Policy* 9(1), pp. 80–93.
- Deterding, N. M., & Waters, M. C. (2018). Flexible Coding of In-depth Interviews: A Twenty-first-century Approach. *Sociological Methods & Research*, 50(2), pp. 708-739
- DeVault, M. L., & Gross, G. (2014). Feminist qualitative interviewing: experience, talk, and knowledge. In Hesse-Biber, S. N. (ed.) *Handbook of Feminist Research: Theory and Praxis* (2nd ed.), pp. 206-236. Thousand Oaks: SAGE
- Dewey, S., & St Germain, T. (2014). “It depends on the cop:” Street-based sex workers’ perspectives on police patrol officers. *Sexuality Research and Social Policy*, 11(3), pp. 256–270.
- Ekberg, G. (2004). The Swedish law that prohibits the purchase of sexual services: best practices for prevention of prostitution and trafficking in human beings. *Violence against Women* 10(10), pp. 1187–1218.
- Farley, M. (2006). Prostitution, trafficking, and cultural amnesia: What we must not know in order to keep the business of sexual exploitation running smoothly. *Yale Journal of Law and Feminism*, 18, pp. 101–136.
- Fawkes, J. (2005). Sex working feminists and the politics of exclusion. *Social Alternatives*, 24(2), pp. 22–23.
- Florin, O. (2012). A Particular Kind of Violence: Swedish Social Policy Puzzles of a Multipurpose. *Criminal Law, Sexuality Research and Social Policy*, (9)3, pp. 269- 278
- Foucault, M. (1978). *The history of sexuality*. Volume 1: An introduction. Random House Inc.
- Foucault, M. (1982). The subject and power. In D. Hubert & P. Rabinow (Eds.), *Michel Foucault: Beyond structuralism and hermeneutics* (2nd ed.), pp. 777–795. University of Chicago Press.
- Garland, D. (2001). *The Culture of Control: Crime and Social Order in Contemporary Society*. Chicago: University of Chicago Press.
- Gerassi, L. (2015). A heated debate: Theoretical perspectives of sexual exploitation and sex work. *Journal of Sociology and Social Welfare*, 42(4), pp. 79–100.

- Graham, L. (2017). Governing sex work through crime: Creating the context for violence and exploitation. *The Journal of Criminal Law*, 81(3), pp. 201–216.
- Groes, C. (2022). Struggling with stigma: Public recognition as a double- edged sword among organized sex workers in Denmark. In Bjønness, J., Nencel, L., & Skilbrei, M.-L. (Eds.). *Reconfiguring Stigma in Studies of Sex for Sale* (1st ed.), pp. 67-93. Routledge.
- Goffman, E. (1963). *Stigma: Notes on the Management of Spoiled Identity*. New York: Simon & Schuster.
- Gunaratnam, Y., & Hamilton, C. (2017). The wherewithal of feminist methods. *Feminist Review*, 115(1), pp. 1-12.
- Hall, S. (2001). The Spectacle of the 'Other'. In M. Wetherell, S. Yates, and S. Taylor (eds.) *Discourse Theory and Practice: A Reader*, pp. 225-283. London: Sage.
- Hesse-Biber, S., & Piatelli, D. (2012). The synergistic practice of theory and method. In S. N. Hesse-Biber (Ed.) *The synergistic practice of theory and method* (2 ed), pp. 176-186.
- Hughes, C., & Cohen, R. L. (2010). Feminists really do count: The complexity of feminist methodologies. *International Journal of Social Research Methodology: Theory & Practice*, 13(3), pp. 189–196.
- Hugstad, M.; Halvorsen, I. L. I.; Jonsson, H. & Nielsen, K. T. (2022). “Some of us actually choose to do this”: The meanings of sex work from the perspective of female sex workers in Denmark. *Journal of Occupational Science*, 29(1), pp. 68-81.
- Immordino, G., & Russo, F. F. (2015). Laws and stigma: The case of prostitution. *European Journal of Law and Economics*, 40(2), pp. 209-223.
- Jakobsson, N., & Kotsadam, A. (2011). Gender equity and prostitution: An investigation of attitudes in Norway and Sweden. *Feminist Economics*, 17(1), pp. 31–58.
- Jones, T., & Newburn, T. (2002). The transformation of policing? Understanding current trends in policing systems. *British Journal of Criminology*, 42(1), pp. 129–146
- Jonsson, S. (2023). Does criminalizing the purchase of sex reduce sex-buying? Evidence from a European survey on prostitution. *European Journal of Law and Economics*, 56, pp. 91–115

- Karlsson, H. (2023). Reducing sex work by targeting ‘vulnerable’ sex workers: A post-structural analysis of policies regulating Danish exit programmes directed at people involved in sex work. *International Journal of Social Welfare*, 33(2), pp. 446–456.
- Kiepek, N., Beagan, B., Laliberte Rudman, D., & Phelan, S. (2019). Silences around occupations framed as unhealthy, illegal, and deviant. *Journal of Occupational Science*, 26(3), pp. 341–353.
- Kotsadam, A., & Jakobsson, N. (2014). Shame on you, John! Laws, stigmatization, and the demand for sex. *European Journal of Law and Economics*, 37(3), pp. 393–404.
- Krusi, A., Kerr, T., Taylor, C., Rhodes, T., & Shannon, K. (2016). ‘They won’t change it back in their heads that we’re trash’: The intersection of sex work-related stigma and evolving policing strategies. *Sociology of Health and Illness*, 38(7), pp. 1137–1150.
- Kulick, D. (2003). Sex in the New Europe: The criminalization of clients and Swedish fear of penetration. *Anthropological Theory*, 3, pp. 199–218.
- Kvale, S. (2007). Analyzing interviews. In *Doing Interviews*, pp. 102-119. SAGE Publications, Ltd.
- Leurs, K. (2017) Feminist data studies: using digital methods for ethical, reflexive and situated socio-cultural research. *Feminist Review*, 115, pp. 130-154.
- Levy, J., & Jakobsson, P. (2014). Sweden’s abolitionist discourse and law: Effects on the dynamics of Swedish sex work and on the lives of Sweden’s sex workers. *Criminology & Criminal Justice*, 14(5), pp. 593–607.
- Lewis, J. (2010). Shifting the focus: Restorative justice and sex work. *Canadian Journal of Criminology and Criminal Justice*, 52(3), pp. 285–301.
- Mattews, R. (2008). *Prostitution, politics and policy*. Milton Park: Routledge-Cavendish.
- Mulinari, D. & Sandell, K. (1999). Exploring the Notion of Experience in Feminist Thought. *Acta Sociologica*, 42(4), pp. 287-297.
- Murray, G.; Johnston, A.; Waitt, L. & G. (2010). Queer(ing) Communication in research relationships: a Conversation about subjectivities, Methodologies and ethics. In Hesse-Biber,

S. N. (ed.) *Handbook of Feminist Research: Theory and Praxis* (2nd ed.), pp. 97-112. Thousand Oaks: SAGE

Murray, Ó. M. (2022). Text, process, discourse: doing feminist text analysis in institutional ethnography. *International Journal of Social Research Methodology*, 25(1), pp. 45-57.

Månsson, S.-A. (2017). The History and Rationale of Swedish Prostitution Policies. *Dignity: A Journal of Analysis of Exploitation and Violence*, 2(4), Article 1.

Nagar, R.; Özlem, A.; Hasan, N. Z.; Rahemtullah, O.; Upadhyay, N., & Uzun, B. (2016). Feminisms, Collaborations, Friendships: A Conversation. *Feminist Studies*, 42(2), pp. 502-519.

Outshoorn, J. (2004). *The politics of prostitution: Women's movements, democratic states and the globalisation of sex commerce*.

O'Neill, M., & Scoular, J. (2007). Regulating prostitution: social inclusion, responsabilisation and the politics of prostitution reform. *British Journal of Criminology*, 47(5), pp. 764–778.

Pillow, W. S., & Mayo, C. (2012). Feminist Ethnography: Histories, Challenges, and Possibilities. In Hesse-Biber, S. N. (ed.) *Handbook of Feminist Research: Theory and Praxis* (2nd ed.), pp. 187-205. Thousand Oaks: SAGE

Pheterson, G. (1993). The Whore Stigma: Female Dishonor and Male Unworthiness. *Social Text* 37, pp. 39– 64.

Phillips, N., & Hardy, C. (2002). What is Discourse Analysis? In *Discourse analysis: Investigating processes of social construction*, pp. 2-17. Sage Publications.

Pitts, M. K., Smith, A., Grierson, J., O'Brien, M., & Misson, S. (2004). Who pays for sex and why? An analysis of social and motivational factors associated with male clients of sex workers. *Archives of Sexual Behavior*, 33(4), pp. 353–358.

Preissle, J. & Han, Y. (2012) Feminist Research Ethics. In Hesse-Biber, S. N. (ed.) (2012) *Handbook of Feminist Research: Theory and Praxis* (2nd ed.), pp. 583-605. Thousand Oaks: SAGE

Rekart M. L. (2005). Sex-work harm reduction. *The Lancet* 366, pp. 2123–2134

Sanders, T. (2005). *Sex work: A risky business*. Devon: Willan Publishing.

Sanders, T. and Soothill, K. (2011). The policing of pleasure: 'What kind of police service do we want?' *The Police Journal* 84(2), pp. 110–124

Sixtensson, J. (2021). 'To say no wasn't something we could do'. Reflexive accounts and negotiations of the ethical practice of informed consent during the research process and beyond. In *The Critical Methodologies Collective* (eds) (2021). *The Politics and Ethics of Representation in Qualitative Research Addressing Moments of Discomfort*, pp. 30-42. London: Routledge.

Skilbrei, M-L., & Holmström, C. (2013): *Prostitution Policy in the Nordic Context: Ambiguous Sympathies*. London: Ashgate.

Smith, M. & Mac, J. (2018). *Revolting prostitutes: The fight for sex workers' rights*. London: Verso

Stormhøj, C.; Pedersen, B. M.; Henningsen, I. B.; Hansen, K. G.; & Rahm, T. (2015). Prostitution in Denmark: Research and Neo-liberal Public Debates. *Nordic Journal of Feminist and Gender Research*, 23(3), pp. 220-226

Tendler, H. (2022). Deportation as Rescue: How Danish Society Responds to the Figure of the Migrant Sex Worker. *Culture and History*, 2 pp.37-56

Vuolajärvi, N. (2019). Governing in the Name of Caring—the Nordic Model of Prostitution and its Punitive Consequences for Migrants Who Sell Sex. *Sexuality Research and Social Policy* 16, pp. 151–165

Wagenaar, H., & Jahnsen, S. O. (2018). *Assessing prostitution policies in Europe*. London: Routledge, Taylor Francis Group.

Weitzer, R. (2010). The mythology of prostitution: advocacy research and public policy. *Sexuality Research and Social Policy*, 7, pp. 15–29.

Weitzer, R. (2018). Resistance to sex work stigma. *Sexualities*, 21(5-6), pp. 717–729.

Williamson, C., Baker, L., Jenkins, M., & Cluse-Tolar, T. (2007). Police-prostitute interactions: Sometimes discretion, sometimes misconduct. *Journal of Progressive Human Services*, 18(2), pp. 15–37.

Wilson, B., Critelli, F. M., & Rittner, B. A. (2015). Transnational responses to commercial sexual exploitation: A comprehensive review of interventions. *Women's Studies International Forum*, 48, pp. 71–80.

Östergren, P. and Dodillet, S. (2011) The Swedish Sex Purchase Act: Claimed success and documented effects. Presented at the ‘International Workshop: Decriminalizing Prostitution and Beyond: Practical Experiences and Challenges’, The Hague, 3–4 March.

### **Reports/Guidelines/Campaigns**

Amnesty International (2016). Amnesty International Policy on State Obligation to Respect, Protect and Fulfil the Human Rights of Sex Workers. <https://www.amnesty.org/en/documents/pol30/4062/2016/en/>

Coalition for the Abolition of Prostitution (CAP), (2025). A grassroots abolitionist approach. <https://www.cap-international.org/en/resources/news/a-grassroots-abolitionist-approach-the-first-guide-of-cap-internationals-exit-programme-is-out.html>

European Sex Workers Rights Alliance (ESWA), (2022). Myth-Busting the Swedish Model: The Evidence Debunking 10 Key Claims of Client Criminalisation. [https://www.eswalliance.org/myth\\_busting\\_the\\_swedish\\_model](https://www.eswalliance.org/myth_busting_the_swedish_model)

European Sex Workers Rights Alliance (ESWA), (2024). Annual Report 2023. [https://www.eswalliance.org/annual\\_report\\_2023](https://www.eswalliance.org/annual_report_2023)

European Sex Workers Rights Alliance (ESWA), (2024). Exposed From All Sides: The Role of Policing in Sex Workers’ Access to Justice. [https://www.eswalliance.org/police\\_research\\_brief](https://www.eswalliance.org/police_research_brief)

European Women’s Lobby (EWL) & Brussels’ Call, (2022). Towards Equality – Progress, challenges and next steps. <https://womenlobby.org/towards-equality-calling-on-the-eu-to-legislate-against-all-forms-of-violence/>

European Women’s Lobby (EWL), (2017). 18 myths on prostitution. <https://womenlobby.org/18-myths-on-prostitution-in-english-spanish-french-german-italian-norwegian/>

Fuckförbundet. (2019). Twenty Years of Failing Sex Workers: A community report on the impact of the 1999 Swedish Sex Purchase Act. Global Network of Sex Work Projects (NSWP).

<https://www.nswp.org/resource/member-publications/twenty-years-failing-sex-workers-community-report-the-impact-the-1999>

Global Network of Sex Work Projects (NSWP), (2024). Let's talk about sex – a terminology statement and guide. <https://www.nswp.org/resource/nswp-publications/lets-talk-about-sex-work-terminology-statement-and-guide>

KAFA (enough) Violence & Exploitation (2014). Exploring the demand for prostitution: What male buyers say about their motives, practices, and perceptions. RealStars. <https://realstars.eu/om-trafficking/mer-lasning/>

Nordic Model Now! (2023). What are we talking about when we talk of the sex industry? <https://nordicmodelnow.org/2023/02/03/what-are-we-talking-about-when-we-talk-of-the-sex-industry-booklet/>

Sverige Kvinnoorganisationer (2023). New survey about sex purchase in Sweden and Germany. <https://sverigeskvinnoorganisationer.se/in-english/>

Women Against Violence Europe (WAVE), (2024). A life free from violence. Primary prevention as the key to eliminating violence against women and girls. <https://wave-network.org/wave-publication-on-primary-prevention/>

World Health Organization (WHO), (2012). Prevention and treatment of HIV and other sexually transmitted infections for sex workers in low- and middle-income countries. <https://www.who.int/publications/i/item/9789241504744>

## Appendix I: Tables

**Table 1. Organizations Contacted for Interview Participation**

### SWEDEN

Name	Mission
RUS (2 in-depth interviews)	Red Umbrella Sweden works towards improving the rights and living conditions of sex workers in Sweden by providing a community with support, information, and advice for sex workers, and by advocating politically to combat the stigmatization and discrimination of sex workers in society.
TALITA	Combat sex trafficking in all its forms through prevention, outreach and rehabilitation.
RFSL	The Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights, is a non-profit organization founded in 1950 that strives to create an equal world where all LGBTIQI people's human rights are respected and no one is left behind.
NSPM	The National Coordination Against Prostitution and Human Trafficking coordinates national work against human trafficking for all purposes.
SVO	Swedish Women Organization is a non-partisan and religiously independent umbrella organization for the Swedish women's movement. Works for the liberation of women and girls, full human rights and an equal society.
MIKA	Counselling clinic for those who have experienced sexual exploitation, such as sex for compensation, sexual self-harm or who have been subjected to human trafficking for sexual purposes.
1000 Möjligheter	1000 Opportunities fights for the rights of children and young people every day. All based on knowledge about violence, sex, gender and power. We work to ensure that young people do not expose others or become victims of violence themselves. a foundation with the goal of an equal society free from violence.
CAP	The Coalition for the Abolition of Prostitution (CAP International) is a movement made of grassroots and survivors-

	led organizations united around a common objective: the abolition of the systems of prostitution and trafficking in human beings for the purpose of sexual exploitation.
RealStars	RealStars is a non-profit organization that works for Fair Sex and a better world free from sex trafficking. RealStar's goal is to channel a large public opinion to put issues around sex trafficking and freedom higher on the agenda in the EU and among other societal actors and together create positive changes for both women and men.
Plattformen Civila Sverige mot Människohandel	The Platform Against Human Trafficking gathers organizations that work in different ways to combat human trafficking. Provides shelter, legal advice, translation services, helpline support, outreach work and help with internships and safely returning to their home country. Works constantly to strengthen victims' rights and change attitudes.

## DENMARK

Name	Mission
SIO (in-depth interview)	The Danish sex workers organization (Sexarbejdernes Interesse Organisation) works to ensure that sex workers have the same rights and opportunities as other employees and the self-employed. Ensure good and safe working conditions.
The Red Van (short interview)	Ensure better conditions for street-based sex workers. With the van it is offered a safer, more hygienic and dignified working environment than the street. Also reduced harm and actively fight for sex workers rights.
AMIxAMI	A non-government, independent organization which does social and healthcare outreach work in Jutland and on Funen. The target group is migrants in sex work and others who may be victims of human trafficking.

KVINDERÅDET	Promote women's rights and conditions with the aim of creating equality, nationally and internationally.
DFPA	Danish Family Planning Association have fought for the right to decide over one's own body. Started fighting to prevent unwanted pregnancies for women in Denmark and has now grown into a fight for the sexual health and rights of all people in and outside Denmark.
REDEN KØBENHAVN / AALBORG	The Nest was established in 1984 by the YWCA's Social Work Department and has since functioned as a refuge for women in abuse and prostitution in Vesterbro. Today a place to be and a place for advice, where women can take a break from the hectic environment on the street and receive free advice and support to create a better life situation for themselves.
GADEJURISTEN	An independent, non-profit organization, run by donations, commitment and government subsidies. Provides out-of-pocket legal aid to vulnerable citizens; people who live on the margins of a society that otherwise easily overlooks the fact that all people are equal before the law.

## Appendix II: Research Materials

### Document 1. Interview Guide

1. Can you introduce yourself and your organization?
2. What is your organization main mission and approach to sex working?

#### Policies

3. How would you describe the current legal framework/policies on sex work?
  - From your perspective, what are the strengths and weaknesses of this system?
  - How have these laws/policies impacted sex workers?
  - Have there been any recent policy changes or public debates that have shifted the view for sex workers?

## Public Attitudes

4. How would you describe the public attitudes towards sex work?

- Does media/public discourse shape the perceptions on sex work? How?
- How does gender equality debates influence the view/attitude towards sex workers?
- Do you see any differences in how different groups (i.e., migrants, lgbtq+) are treated within the sex work community?

5. In your opinion, how does your country approach to sex work compare to other models?

- What do you think other countries could learn from your country policies?
- If you could change an aspect, or more, in your country sex policy, what would it be? Why?

## Everyday lives of sex workers

6. How do you engage with sex workers (the affected individuals) in your work?

- What are the most common concerns they have?
- Are there any support systems for sex workers? Which ones?
  - o If there are not, which one would you implement?
  - o If there are, would you change something?

7. Is there anything important we have not covered that you would like to add?

8. Would it be possible to have an interview with someone else from your organization?

## **Document 2. Informed Consent Form**

I, the undersigned, confirm that (please tick the appropriate box):

1.	I understand the information about the project.	<input type="checkbox"/>
2.	I have been given the opportunity to ask questions about the project and my participation.	<input type="checkbox"/>
3.	I voluntarily agree to participate in the project.	<input type="checkbox"/>
4.	I understand I can withdraw at any time without giving reasons and that I will not be penalised for withdrawing nor will I be questioned on why I have withdrawn.	<input type="checkbox"/>

5.	The procedures regarding confidentiality have been clearly explained (e.g. use of names, pseudonyms, anonymisation of data, etc.) to me.	<input type="checkbox"/>
6.	If applicable, separate terms of consent for interviews, audio, video or other forms of data collection have been explained and provided to me.	<input type="checkbox"/>
7.	The use of the data in research, publications, sharing and archiving has been explained to me.	<input type="checkbox"/>
8.	I understand that other researchers will have access to this data only if they agree to preserve the confidentiality of the data and if they agree to the terms I have specified in this form.	<input type="checkbox"/>
9.	Select only <b>one</b> of the following: <ul style="list-style-type: none"> <li>• I would like my name used and understand what I have said or written as part of this study will be used in reports, publications and other research outputs so that anything I have contributed to this project can be recognised.</li> <li>• I do not want my name used in this project.</li> </ul>	<input type="checkbox"/>
		<input type="checkbox"/>
10.	I, along with the Researcher, agree to sign and date this informed consent form.	<input type="checkbox"/>

**Participant:**

\_\_\_\_\_  
 Name of Participant                      Signature                      Date

**Researcher:**

\_\_\_\_\_  
 Name of Researcher                      Signature                      Date