



February 1, 2024

VIA EMAIL to hrc-sr-vaw@un.org

RE: The National Survivor Network's Input for SR VAWG's report on violence against women and prostitution

Dear Ms. Reem Aslalem:

The National Survivor Network (NSN) is a values-based, survivor-led professional membership network for survivors of human trafficking who are engaged in or preparing for leadership in the anti-trafficking movement. In February 2011, Cast launched the NSN to foster connections between survivors of diverse forms of human trafficking and to build a national anti-trafficking movement in which survivors are at the forefront and recognized as leaders. While the NSN is a program of Cast, our funding explicitly requires that everything we do is survivor-led at every level, and thus we operate with a high degree of autonomy.

The NSN's members all have lived experience of human trafficking. We are people who have experienced trafficking in legal industries, criminalized trades (including commercial sex), as youth and as adults, in the United States and in other countries. Our members include migrants, US citizens, survivors of the Murdered and Missing Indigenous Women crisis, two-spirit and LGBTQ individuals, and people with diverse disabilities and chronic illnesses, some of which emerged from our trafficking. Our members work for local and state anti-trafficking programs as direct service providers, are consultants to organizations nationwide, or work at the national level as leaders, employees, and consultants. Many of us run full-time networks empowering other survivors in their healing and/or work. The NSN's diverse membership makes it uniquely representative of the myriad of situations experienced by survivors of human trafficking.

The National Survivor Network explicitly opposes partial criminalization (also known as demand reduction, end demand, "equality model," and Nordic model) and finds it to be a politicized shoe-horning of our very traumatic experiences as trafficking survivors into an ideological, anti-sex work framework. While we all oppose partial criminalization and shame-based "demand reduction" practices, we have a diversity of perspectives about commercial sex. This is on misconception about those who oppose partial criminalization or support full decriminalization: **Those who oppose sex work have intentionally misrepresented those who oppose partial**

criminalization as pro-sex work, pro-trafficker, or pro-pimp. In fact, many *actual survivors of human trafficking within the sex trades* have been accused of being “part of the pimp lobby,” “funded by big porn,” or “maybe a trafficker yourself” when they express what solutions they feel would be helpful. This is counter to a survivor-informed movement that values lived experience, whether these attacks come from individuals without lived experience or other survivors.

Some of our members feel like sex work is valid and neutral work, some of our members feel like sex work is exploitative but that most other undervalued work under capitalism is as well, and some feel like sex work is uniquely exploitative (even when force, fraud, or coercion is absent) but do not feel that partial criminalization is the right solution. All of us agree that many people engage in commercial sex do so out of lack of options or opportunity, as is the case with many forms of labor commonly available to marginalized communities or regions. We often think of the comparison of coal mining – in many communities it is the only decently-paying job available, it can be generational, it carries significant mental and physical health impacts, and contributes to globally harmful impacts. And yet, it is not regarded or addressed in the same way as commercial sex. This is due to stigma and anti-sex work policies and advocacy.

Many of our members have been harassed, dismissed, or not allowed in many anti-trafficking and anti-exploitation spaces due to the presumptions embedded in “demand reduction.” When survivors of exploitation or human trafficking are excluded from spaces meant to develop solutions for them because they do not agree with the already-presumed solutions, we create echo chambers in which valuable survivor voices are lost. Language continues to be used that denies individuals’ agency and ability to choose sex work and negates their consent. This is present even in the wording of the call for input itself: referring to all sex workers as “prostituted women and girls” denies choice – the answer is already implied in the way the question is asked, making honest feedback unlikely. Focusing on women and girls disregards the ways in which patriarchal violence (such as sexual assault, domestic abuse, and much of human trafficking) impacts people of all genders, including women and girls (cisgender and transgender), as well as nonbinary people and men and boys (cisgender and transgender). Extreme violence against sex workers often stems from misogyny, no matter who it is directed at, and transgender women often bear the highest brunt of violence and death.

We believe that human trafficking and other forms of exploitation occur when rights are denied, which means that **the way to end trafficking and exploitation is to include that people have rights, including adult sex workers.** Partial criminalization often relies on denying workers rights for those in the sex trades, replicating narratives that reinforce stigma against sex workers, and denying the agency and autonomy of adults who trade sex consensually.

Interestingly, implementation of this approach often denies the agency and autonomy of individuals in the sex trades about when and how to leave, and when and how to get help, thus interfering with their safety and impeding the restoration of their autonomy.

Research as shown that **partial criminalization replicates the harms of full criminalization of commercial sex**,¹ which is why the NSN does not support partial criminalization.² These harmful impacts effect not just individuals in the sex trades consensually, but victims being sex trafficked.³ We oppose “demand reduction” because:

1. End demand causes harm by increasing the power buyers have over people in the sex trades. End demand practices put people who trade sex in the position of protecting buyers (who may be more mistrustful if they are fearful that they are being set up or entrapped), which makes the person trading sex more likely to take on higher-risk situations in order to meet trafficker-imposed quotas or income needs. For example, a buyer/client may be less likely to participate in screening, which may in turn lead to increased reliance on third parties.
2. End demand puts people in increased contact with law enforcement by increasing policing. This increases the likelihood that people who trade sex will be deported, arrested for prostitution or other charges (such as drug-related charges), assaulted by law enforcement, or be criminalized in some other way. Criminalization can cause people to lose custody of their children, lose housing or housing benefits, lose government assistance, and be ineligible for many employment opportunities.
3. End demand reduces income for people who are in the sex trades consensually without changing the fundamental societal and economic conditions that create their vulnerability to trafficking, thereby decreasing their economic security and stability.
4. End demand practices harm people by promoting banking discrimination, making people reluctant to help them, and by criminalizing the ways that they organize to keep themselves safe. Even in countries where people in the sex trades cannot be arrested or charged with prostitution, they still may face consequences for working together (like a buddy system), taking in-calls (in their home or other worker-controlled location, rather than unknown settings), living with other people in the sex trades, or helping another sex worker or survivor find clients or safety information. Similarly, these criminal-legal frameworks often define trafficking in ways that criminalize helping people who trade sex. For example, someone might be less likely to let a homeless young person stay with them while looking for more stable housing if they are afraid they will be charged with trafficking.

¹ <https://nationalsurvivornetwork.org/document-tag/demand-reduction/>

² <https://nationalsurvivornetwork.org/endeddemandannouncement/>

³ <https://nationalsurvivornetwork.org/endeddemandstatement/>

5. End demand increases shame, stigma, and misinformation about commercial sex. In countries where end demand is practiced, people in the sex trades still experience discrimination from families, partners, child welfare agencies, and housing providers based on their engagement in commercial sex. Even end demand awareness campaigns that do not include criminal-legal approaches rely upon shame/stigma, repeating language that justifies violence against people in the sex trades, denying their agency, invalidating their autonomy, and suggesting that all people in commercial sex are being coerced.⁴

This is counter to a human rights framework.

Our input will align with our previously published statements on commercial sex, exploitation, and trafficking. As a reminder: We are all survivors of human trafficking, and over half of us have experienced sex trafficking directly whether as minors or as adults. The majority of our feedback is in regards to adults except where indicated, and we wholeheartedly believe that nobody should ever pay to have sex with a minor.

Provide examples of the hidden forms of ~~prostitution~~ commercial sex, and explain to what extent they are recognized and dealt with as such?

The NSN has no input on this.

Describe the profile of women and girls affected by ~~prostitution~~ commercial sex in your country, and provide disaggregated data, where possible.

The NSN has no input on this.

⁴ Ibid.

Describe the profile of those who solicit women in prostitution commercial sex and whether such relations are regulated, and provide supporting data, where possible.

The NSN has no substantial input on this but notes that many of our members who experienced sex trafficking were identified, supported, and assisted in their escapes from their traffickers by clients/buyers who recognized that something was off.

What forms of violence are prostituted women and girls in commercial sex subjected to (physical, psychological, sexual, economic, administrative, or other)?

1. Sex workers have a 45-75% chance of experiencing sexual violence on the job.⁵ Even when individuals willingly consent to engaging in commercial sex there may still be specific sexual acts they are not willing to do in certain situations, and language that “men who buy prostitutes can do whatever they want to them” (often repeated by anti-sex work activists as a call to end commercial sex) reifies and reinforces the stigma that enables this violence to continue.
2. People in commercial sex are often subjected to police violence that includes “assault, sexual harassment, public ‘gender searches’ (police strip searches for the purpose of viewing genitalia), and rape.”⁶ This is true for people in commercial sex across the spectrum of agency -- who are there consensually, those who are there out of circumstance, and those who are there through trafficking.⁷ Sex workers and trafficking survivors report that police will often threaten arrest them if the person does not perform sexual acts on the officer (or similarly, will offer to “let this one go” in exchange for oral or penetrative sex). In the United States, it is not illegal for officers to engage in sexual contact with potential victims while acting under the color of law, and recent attempts to include this in our federal anti-trafficking legislation failed due to agencies insisting that they must be able to engage in sexual activity under fraudulent pretenses in order to investigate human trafficking, prostitution, and other crimes. Individuals report that they may be mid-handjob or mid-oral sex when the police officer produces a badge and identifies as law enforcement, and this is traumatic for *all* individuals in commercial sex, particularly so for those already there through force, fraud, or coercion. This is especially true in the US in investigations into Asian massage businesses, in which racism meets anti-sex work stigma, leading to trauma, deportation, and incarceration

⁵ <https://pubmed.ncbi.nlm.nih.gov/24625169/>

⁶ <http://www.bestpracticespolicy.org/wp-content/uploads/2013/01/2014UPRRReportBPPPDASWOPNYC1.pdf>

⁷ See “Learning: Spectrum of Agency” <https://nationalsurvivornetwork.org/learning-the-spectrum-of-agency/>

for massage workers. Workers have reported finding these raids terrifying, and have even jumped to their deaths to escape this terror.⁸

3. People in commercial sex are often subject to higher levels of state violence. In addition to the police violence named above, they face higher rates of race- and gender-based surveillance and incarceration. While “diversion courts” aim to offer people in commercial sex a way out of incarceration, our colleagues in cities that have implemented diversion courts report increases in policing as a result, as officers now believe they are “rescuing” people by funneling them into diversion courts. Research has identified other harms of these models, which include lack of appropriate, inclusive, or relevant supports.⁹ Once people are involved in diversion programs, they face stiffer penalties for even small offenses. In 2019, Layleen Polanco (an Afro-Latina transgender woman) died in solitary confinement after being incarcerated for a minor offense. She was incarcerated because of the terms of her diversion court program.¹⁰ For reasons like this, racial justice advocates working on state and interpersonal violence oppose policing commercial sex as an issue of state violence against women of color (and particularly transgender women of color).¹¹
4. Legislative oppression also impacts individuals in commercial sex. We mentioned earlier in our report that survivors of sex trafficking who oppose standard “demand reduction” approaches are systematically and intentionally excluded from anti-exploitation policy spaces, and because of this harmful policies are enacted that create additional harms for people engaging in commercial sex. If you are operating on the assumption that the only solution is ending commercial sex, you will not thoughtfully consider options that minimize harms experienced by sex workers. One example of this in the US is SESTA-FOSTA, which ultimately pushed sex workers into riskier forms of commercial sex when they lost access to online platforms they’d previously used for work and screening.¹² Many workers (some of them who are survivors of trafficking in their pasts and now used online sex work as a way to maintain independence from their traffickers and abusers) lost access to online sex work and were forced either to return to their traffickers or into street-based sex work, which carries higher exposure risk for violence, including by law enforcement.¹³ SESTA/FOSTA had negative impacts on trafficking victims as well: The US Government Accountability Office reported that trafficking has become more difficult to investigate since SESTA/FOSTA due to relocation of platforms overseas (where they may not be subject to US subpoenas for evidence).¹⁴ Thus, by “pushing purveyors of sex both consensual and non-consensual farther into the dark

⁸ <https://theappeal.org/new-evidence-in-the-death-of-a-queens-massage-worker/>

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https://law.yale.edu/sites/default/files/area/center/ghjp/documents/diversion_from_justice_pdp_report_ghj_p_2018rev.pdf

¹⁰ <https://www.rollingstone.com/culture/culture-features/layleen-polanco-transgender-decriminalize-sex-work-847437/>

¹¹ <https://incite-national.org/policing-sex-work/>

¹² <https://www.antitraffickingreview.org/index.php/atrjournal/article/view/448/364>

¹³ <https://hackinghustling.org/erased-the-impact-of-fosta-sesta-2020/>

¹⁴ <https://www.gao.gov/assets/gao-21-385.pdf>

web, FOSTA-SESTA has worsened the problem of sex trafficking in the US.”¹⁵ Additionally, laws that criminalize consensual adult sexual behavior (including commercial sex involving consenting adults) violate people’s human rights and are the foundation for a vast array of laws targeting women and girls as well as LGBTQ individuals.¹⁶

5. Debanking and financial discrimination forces individuals into the sex trades (and in other forms of gig economy) into risky situations and financial crisis. Research shows that “almost three quarters (72 per cent) of online respondents reported using financial technologies in their sex work and a third (33 per cent) said they had been kicked off a payment processor. The majority (78 per cent) of WCIIA respondents reported not having access to a bank account and only 10 per cent reported ever receiving payment from sex work through an online payment processor.”¹⁷ For those sex workers hoping to leave commercial sex, this imposed financial precarity poses a significant barrier to building the stability that might enable them to leave.

Who is responsible for the perpetration of violence against women and girls in ~~prostitution~~ commercial sex?

In general, there is not a simple answer to this. Some are clients, including clients with a variety of racial and income backgrounds. While adult consensual sex workers may engage with clients who are powerful individuals, sex trafficking survivors also report being forced to engage in commercial sex with government officials (including elected), celebrities, diplomats with immunity, teachers, religious leaders, social service providers and directors, judges, prosecutors, immigration officials, and law enforcement. Any time a person is forced into commercial sex or engaged/enticed into it into a minor, this is violence. And any time a person engaging in commercial sex by choice or circumstance is forced to engage in acts they didn’t consent to, defrauded out of the terms to which they’d agreed to it, or raped, this is violence against individuals in commercial sex.

Describe the linkages, if any, between prostitution and the violation of the human rights of women and girls.

The NSN’s feedback is captured in our comments above. Forcing anyone into commercial sex or sexually exploiting a minor is a violation of human rights, as is criminalizing consensual adult sexual behavior.

¹⁵ <https://www.bjcl.org/blog/sex-sells-but-not-online-tracing-the-consequences-of-fosta-sesta>

¹⁶ <https://www.amnesty.org/en/wp-content/uploads/2021/05/POL4077632018ENGLISH.pdf>

¹⁷ <https://www.antitraffickingreview.org/index.php/atrjournal/article/view/448/364>

What links are there between pornography and/or other forms of sexual exploitation and prostitution?

Anti-sex work activists have highlighted the percentage of traffickers and/or sex work clients who use pornography. This overlooks the widespread use of pornography by those who are not traffickers or sex work clients, so use may not be any higher in that population. Additionally, research has identified a strong correlation between pathology connected to pornography and moral conviction that pornography is wrong, meaning that pornography viewers who have a strong belief that viewing it is immoral or wrong may experience higher levels of distress, shame, and pathology than those who have not internalized shameful messaging.¹⁸ We saw this play out in action in 2021 when a man from a deeply religious household who'd been engaged in religious anti-pornography "sex addiction treatment" and online anti-pornography support groups opened fire on a spa business in Atlanta.¹⁹ Numerous researchers have been engaged in exploring the ways in which extreme anti-pornography rhetoric radicalizes young men into aggression, misogyny, and violence.²⁰

This proves challenging in the US context when anti-pornography groups move into the anti-trafficking spaces and begin to dominate the dialogue, often fostering unhealthy, extremist, abstinence-only anti-porn approaches. Alternatively, public health researchers like Emily Rothman have been engaged in developing porn literacy curriculum for youth using a media literacy lens that encourage youth to think critically about what messages porn may convey about themselves, about consent, about gender and sexuality, and about race. This evidence-informed curriculum, *The Truth About Pornography*, is showing promising results in changed attitudes in post-test surveys and will hopefully be further evaluated to build an evidence base.²¹ Unfortunately, public insistence on abstinence-based pornography education that frequently relies on myths and shame may make it challenging to get an evidence-informed literacy curriculum implemented, regardless of proven impacts. Porn literacy among youth could make it less effective as a tool for grooming by traffickers.

¹⁸ Grubbs JB, Perry SL. Moral Incongruence and Pornography Use: A Critical Review and Integration. *J Sex Res.* 2019 Jan;56(1):29-37. doi: 10.1080/00224499.2018.1427204. Epub 2018 Feb 7. PMID: 29412013.

¹⁹ <https://slate.com/human-interest/2021/03/sex-addiction-fact-check-atlanta-shooting-history.html>

²⁰ Much of that research is cited/compiled in this article: <https://www.psychologytoday.com/us/blog/women-who-stray/202108/was-uk-mass-murderer-radicalized-in-anti-porn-groups>

²¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6951388/>

How is the issue of consent dealt with? Is it possible to speak about meaningful consent for ~~prostituted~~ women and girls engaged in commercial sex?

Nobody should *ever* be paying to have sex with children. Full stop. And also, it's important to remember that many minors who end up sexually trafficked end up there after having to make other impossible choices due to marginalization, poverty, or prior abuse, and their lives should be understood in context rather than reduced to their sexual exploitation as their defining quality.

For adults, we *must* speak about meaningful consent if we are to honor survivors' agency and autonomy. A concept from transnational feminism that is helpful for understanding consent (not just in commercial sex but in all women's choices) is "bounded agency." Bounded agency is a term used by scholars of postcolonial theory to describe the ways in which *all* of our choices are in some way bound by cultural norms that vary regionally. However, Western feminists often focus on the ways in which other women's' options are bound by culture while viewing their own culture's understanding of "freedom" as the norm against which others are compared. Thus, we fail to see the way our own choices are similarly bound by our culture or circumstances, and refuse to see the ways in which others enact agency within the bounds of their cultures. Women who have never had to engage in commercial sex, whose interest in helping end trafficking and exploitation stem from desires to help,²² defining for others whether or not their choices are "free" for them based on one's own set of values is epistemological violence. We must believe individuals in commercial sex know their own situations better than we do, and having experienced trauma does not negate that.

Many arguments that deny the agency of those engaged in commercial sex infantilize or invalidate the people involved. Suggesting that experiencing prior trauma (particularly sexual trauma) makes someone unable to consent to commercial sex implies that survivors of prior trauma can no longer make informed choices about their own bodies and sexuality, ever. Suggesting that the existence of a power dynamic (such as a client having a different race, economic status, or gender from the sex worker) precludes consent implies that *any* sexual interaction that involves power differentials is similarly nonconsensual. Suggesting that the presence of money negates consent because you wouldn't do it if you weren't being paid implies that *all* paid labor is forced because you wouldn't be doing it if you weren't paid.

Joel Quirk's framework for the continuum of exploitation may prove helpful in this regard. While we typically think of exploitation as being a small aberrance in a sea of otherwise free

²² <http://www.rhizomes.net/issue10/agustin.htm>

labor, most labor falls under range of exploitation and very little labor is freely chosen.²³ Sex work is not entirely unique in this regard.

It is true that people often engage in commercial sex when they have few meaningful or accessible options, whether due to racial or gender discrimination, transphobia, poverty, homelessness, substance use, or a criminal background. As survivors of human trafficking, many of whom have also engaged in commercial sex when we had very few options, we grieve this reality. What makes us different from standard “demand reduction” advocates is that we don’t believe ending sex work is the option; we believe that the better solution is ending racial and gender discrimination, transphobia, poverty, homelessness, childhood trauma, and mass incarceration. If people are not pressed under the weight of oppression, they can make choices, and those who don’t want to choose sex work won’t have to.

This may seem like a radical concept to those steeped in “demand reduction” language and framings, but we believe that rather than trying to end commercial sex or pornography a more effective strategy that is more aligned with a human rights framework is to root out and address violence against sex workers and exploitation within pornography. After all, for centuries, domestic violence was normalized and accepted as an inherent part of marriage and it was not resolved through bans on marriage – it was addressed through specific efforts to end abuse within marriage.

Some groups of individuals in commercial sex are already working on in-group solutions. The BIPOC Adult Industry Collective is working to name and push back against racism in the adult industry and to support BIPOC sex workers so they are less vulnerable to exploitation. Several smaller adult sites are offering more transparency about the treatment and payment of their workers. Some sites offer companion videos for every erotic video that allows the performers to discuss how they navigated consent on set. Similarly, erotic laborers are organizing for (and in some cases winning) rights in clubs.²⁴

The reality is that we must look at collective solutions rather than legislating on individual experiences. An individual may say, “in my experience, all commercial sex was exploitative and I believe I was prostituted,” but they cannot then say “which then means that the experience of every person in commercial sex is exactly like mine.” If another individual says, “in my experience, some of my commercial sex was trafficked, but then at other times I chose it myself,” we don’t get to invalidate that person’s reality just because someone else had a different experience. We then must accept that for some people, all their engagements with commercial sex felt exploitative, and for others, it felt consensual, and we must build solutions that acknowledge this reality.

²³ <https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/are-you-better-or-worse-understanding-exploitation-through-comparison/>

²⁴ <https://www.haymarketpole.com/> is one example of worker organizing.

How effective have legislative frameworks and policies been in preventing and responding to violence against women and girls in prostitution commercial sex?

Largely ineffective and often with harmful consequences. As mentioned earlier, SESTA/FOSTA left individuals in commercial sex less safe and stable than prior and hindered trafficking investigations. The SAFE SEX Workers Study Act was introduced into the US Senate in March of 2022, and would have required the US Department of Health and Human Services to study the impacts of SESTA/FOSTA on individuals engaged in adult, consensual sex work. This bill never went anywhere, but its failure to move is indicative of the US legislative approach to ending violence against people engaged in commercial sex in general: 1) Voices prioritized at the table are those who already support “demand reduction” and critical voices are intentionally excluded, 2) “Anti-trafficking” work is undertaken in isolation, rather than as part of an overall approach to ending exploitation, 3) Which leads to enacting a variety of ideological strategies without consideration for (much less evidence about) how these laws may negatively impact vulnerable populations, and then 4) These laws are then expanded and increased, without ever researching or checking the initial foundations and assumptions upon which the strategy was based. We evaluate whether or not “Johns Schools” (for example) cause men to see buying sex as violent without knowing that this shift in perspective would have any impact on trafficking at all.

Additionally, the US government (again guided by exclusive voices after intentional exclusion of dissenting lived experience expertise) enacted the “Anti-Prostitution Pledge,” meant to restrict federal victim services funding (including for sexual and domestic violence and HIV prevention and response) to those who oppose the legalization or promotion of prostitution, essentially banning dialogue about harm reduction approaches that are better supported by the evidence.²⁵ This de facto ban on discussing evidence-supported strategies further cements the systematic exclusion of dissenting survivor voices on how to address trafficking and exploitation, and forces survivors to reframe/revise their stories to fit into the state-sanctioned narrative if they want to gain access to federally-funded “survivor leadership” roles, which then continues skewing public assumptions about commercial sex, which then impacts further policy decisions when policymakers are influenced by misinformed community members and lobbyists.

²⁵ <https://nationalsurvivornetwork.org/definitions/#anti-prostitution-pledge>

What measures are in place to collect and analyse data at the national level with a view to better understanding the impact that ~~prostitution~~ commercial sex has on the rights of women and girls?

This is difficult to answer in the US context because of the anti-prostitution pledge limiting federally funded programming (including research and evaluation) to those motivated by ending commercial sex. Additionally, since much data comes from service providers, and all federally-funded service providers in the United States are bound by the Anti-Prostitution Pledge, available data will likely be skewed and biased.

What measures are in place to assist and support women and girls who wish to leave ~~prostitution~~ commercial sex?

Many anti-trafficking organizations attempt to provide this support, although most of them are underfunded or focus on short term “rescue and restore” rather than fostering long-term, sustainable economic security and emotional wellbeing.

Supporters of partial criminalization often suggest that there are not sex worker programs that assist people wanting to leave sex work and that sex worker organizations’ only solutions are to leave people there. This is 1) often illustrative of the lack of funding for sex worker harm reduction organizations due to the anti-prostitution pledge, which means less programming is available, and 2) categorically untrue.

LIPS Tampa is an organization by and for Black trans women in Tampa, Florida. LIPS provides harm reduction support and outreach for Black trans sex workers that does not push or encourage them to leave, but also provides professional development to them on other skills they can use to build economic stability.²⁶ GLITS INC, a BIPOC transgender advocacy group in New York who works with many sex workers, offers a leadership academy to strengthen sex workers’ professional skills.²⁷ SWOP Behind Bars offers a re-entry program for sex workers leaving incarceration to try to build their stability and gain legal and financial support that would increase their agency and ability to make choices.²⁸ Many, many harm reduction programs offer as much support as they are able to those who want to leave, and refer trafficking victims to services as desired. Increases in funding and removal of funding restrictions that prevent these organizations from being able to expand their services programming would allow them to do even more.

²⁶ <https://www.lipstampa.org/services-5>

²⁷ <https://www.glitsinc.org/services>

²⁸ <https://www.swopbehindbars.org/programs-and-services>

What are the obstacles faced by organizations and frontline service providers in their mission to support victims and survivors of prostitution?

The anti-prostitution pledge, lack of sufficient funding and resources, lack of affordable housing, lack of culturally-responsive therapy and trauma services, and too much focus on short-term “rescue” rather than building long-term autonomy, agency, and stability.

What are some of the lessons learned about what works and what does not when it comes to stemming any negative human rights consequences from the prostitution of women and girls?

The NSN has no input on this.

Are frontline organizations and survivors' organisations sufficiently included in policymaking at the national and international level?

Partially. Many of the organizations engaged in policymaking at these levels are not led by survivors, and many of them are politically or religiously oriented in a way that is inherently anti-sex work and anti-pornography. Survivor voices at the table are often white, Western women, and are heavily curated for bias against sex worker safety, and they are often used in tokenizing ways by organizations, politicians, and activists who hold institutional/economic power. When survivors speak candidly with each other, we often talk about how hard it is to suddenly have your income come from public speaking about your experiences, which automatically includes a power dynamic held by the organization that is paying you. Survivors report shaping their stories and the ways they tell them to the policies and narratives of the organizations that hire them so that they can continue to increase their personal economic stability, and discuss how it feels exploitative but they have few other options. This illustrates how the “Spectrum of Agency,” discussed earlier in this input, applies also to choice, circumstance, and coercion in survivor storytelling in policy and awareness spaces. Survivor-led organizations are rare and often woefully underfunded, and many of them are focused on services or professional development rather than policy.

What recommendations do you have to prevent and end violence associated with the prostitution commercial sex for women and girls?

1. End any practices like the US “Anti-Prostitution Pledge” which limit use of service funding for evidence-based harm reduction practices.
2. Create equitable, nonjudgmental spaces where individuals with a variety of perspectives about commercial sex can have open, facilitated conversations to find shared solutions that surgically target exploitation, racism, misogyny, child abuse/exploitation, trafficking, and violence against sex workers in collaborative ways that do not invalidate the experiences of survivors who support sex worker safety.
3. Adopt language that avoids perpetuating stereotypes against sex workers. Biased language often includes “prostituted” to refer even to consensual workers, referring to all commercial sex as “exploitation,” and language that suggests only a broken person would ever “choose” sex work or that deny their agency to make their own choices.
4. Support sex worker safety harm reduction efforts, such as those that involve community-building, bad date lists, and helpful safety information. Examples include Aileens,²⁹ Sidewalk Project,³⁰ and Whose Corner Is It Anyway.³¹
5. Freedom Network USA and the National Survivor Network collaborated on the creation of *Re-Centering Sex Worker Safety in Anti-Trafficking Work: Perspectives from the Field*.³² This document emerged out of the findings and ideas of a meaningful convening of anti-trafficking frontline providers and researchers and sex worker organizers, with many individuals in both of those categories having lived experience of sex trafficking. The goal was to collaboratively determine what it would look like to engage in anti-trafficking efforts that did not cause harm to sex workers and sex worker safety advocates, and to provide concrete guidance to the anti-trafficking field based on those findings. The Special Rapporteur is encouraged to review this document for ideas, as well as for a hopefully replicable example of collaboration between anti-trafficking and sex worker safety advocates.
6. Hold those who perpetrate violence against sex workers accountable, including clients who assault them and law enforcement officers who exploit them.
7. Ensure that anti-trafficking sting operations are only done when there is evidence of trafficking, and not just as anti-prostitution operations pretending to be anti-trafficking. The media often reports almost verbatim the press releases of law enforcement agencies that have conducted anti-prostitution operations by their “human trafficking unit” (which is sometimes just a rebranded vice unit) resulting in “hundreds” of arrests. When we dig deeper, it is often either clients of consensual sex work who are arrested, or worse, the sex workers or trafficking survivors themselves. This then leads to a

²⁹ <http://aileens.org/>

³⁰ <https://www.thesidewalkproject.org/>

³¹ <https://www.thirdwavefund.org/grantees/whose-corner-is-it-anyway>

³² <https://freedomnetworkusa.org/app/uploads/2023/10/Recentering-Sex-Worker-Safety-in-Anti-Trafficking-Work.pdf>

misconception in the public about what the arrests were for – misconceptions that are rarely corrected.

8. Ensure that victims of trafficking are never arrested, including children. Arrest should never be the “service,” and threats of arrest to coerce a (potentially false) disclosure of trafficking replicates the coercion of trafficking itself.
9. Trafficking and exploitation often happen when people do not have a strong social safety net and thus are left with few options. When we make sure people have options, we reduce their likelihood of exploitation. Economic stability, early childhood interventions that reduce trauma and support the whole family, accessible housing, universal healthcare, and safe migration routes are essential to preventing trafficking.
10. Support worker organizing among individuals in commercial sex so that they themselves can best determine what their needs are and how to address them.