Briefing Paper: Turn off the Red Light



Campaign to criminalise the purchase of sex and stop the demand for trafficked and prostituted women and girls in Ireland

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The Immigrant Council of Ireland (ICI) is an independent human rights organisation. We advocate for the rights of migrants and their families and act as a catalyst for public debate. Our Information and Referral Service responds to more than 10,000 enquiries each year. We are also an Independent Law Centre, which allows us to provide legal representation to clients.

In 2009, the ICI published groundbreaking research exploring the trafficking of migrant women into the Irish sex industry. The research, "Globalisation, Sex Trafficking and Prostitution: The Experiences of Migrant Women in Ireland", was funded by the Religious Sisters of Charity and carried out in collaboration with the Health Service Executive (through the Women's Health Project, Baggot St) and Ruhama.

Trafficking in human beings has increasingly been recognised as a global human rights violation. The US State Department estimates that approximately 800,000 people are trafficked across national borders, which does not include the millions trafficked in their own country. Approximately 80 per cent of transnational victims of trafficking and forced labour are women and girls, up to 50 per cent of which are minors (US State Department 2006). The majority of transnational victims

are females trafficked for the purpose of commercial sexual exploitation.

International concern about trafficking is welcome and has been reflected in a number of human rights instruments and conventions that underpin the fundamental rights of those exploited through trafficking. The UN Palermo Protocol lays the foundation for international action on trafficking by providing an international framework for the definition of trafficking. It refers to force, coercion, movement and exploitation. Article 3 (a) of the Protocol states:

"Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs."

Article 9 (5) of the Protocol requires the States Parties to:

"adopt or strengthen measures to discourage the demand that fosters exploitation of persons, particularly women and children, leading to increased trafficking."

The Council of Europe Convention on Action against Trafficking in Human Beings also underlines "the importance of tackling demand in order to prevent and combat the traffic itself." It urges governments to:

"discourage the demand that fosters all forms of sexual exploitation of persons, especially women and children, that leads to trafficking through legislative, administrative, educational, social, cultural, or other measures."

Ireland has followed international example in introducing specific legislation and policy initiatives to respond to the issue of trafficking with the introduction of the Criminal Law (Human Trafficking) Act 2008, the setting up of the Anti-Human Trafficking Unit in the Department of Justice and Law Reform and the publication of a National Action Plan to Combat Trafficking. However, the Irish response, as in most countries, has focussed on the targetting of women by traffickers and their transportation across borders with much less attention given to the industries in destination prostitution countries, such as Ireland, which are the locations in which women and girls are bought for sexual exploitation, regardless of their means of entry. The buying of a person for sex is legal in Ireland. Criminal offences in relation to prostitution remain for the most part as minor public order offences, such as soliciting, or are related to the criminal activities of organised crime.

Research in Ireland carried out by the Immigrant Council of Ireland (Kelleher et al., 2009) reveals a criminal underworld in which

traffickers, international Irish pimps, prostitution agencies and buyers collaborate in the commercial sexual exploitation of over 1,000 women and girls. It indicates a highly lucrative and easily accessible sex industry worth approximately €180 million into which women from poor regions of the world are trafficked and recruited to service the sexual demands of men in Ireland. The widespread use of the internet and mobile phones has made the buying of sex much more accessible but less visible as the core of the prostitution industry in Ireland has moved indoors. At any one time over 800 women, up to 97 per cent of whom are migrant women, are advertised with sexually explicit pictures of each woman and detailed lists of the sexual acts which can be bought. Apartments and hotels are the main locations but buyers can also get 'call outs' to their homes in any part of the country by filling out an order form with explicit details of her body and the sexual acts they want her to perform. There is no national strategy to respond to this huge growth in the Irish sex industry or to tackle the increased level of demand for commercial sex.

Sweden and increasingly other countries including Norway and Iceland have recognised that the most effective way to prevent pimps and traffickers supplying an ever increasing number of women to sex markets is to address demand. By criminalising the buyers of sex in 1999, the Swedish state sent out a clear message that the use of women and girls for sexual gratification would no longer be tolerated. By de-criminalising women in prostitution and providing resources for support and exit routes they also recognised exploitation and harm of being prostituted. Over the past decade Sweden has been successful not just in preventing trafficking but in changing peoples' attitudes to prostitution with 85 per cent of the population now supporting the law.

Ireland can now follow their example in creating a society where the sexual

exploitation of women and girls is seen as unacceptable and contrary to a society based on equality and justice. We can change Ireland from being a welcome and easy location for traffickers, pimps and prostitution agencies and end the tacit acceptance of Ireland as a destination country for the marketing of migrant women and girls. A law criminalising the buying of women and girls for the purpose of sexual exploitation should introduced alongside a widespead educational and awareness raising campaign on the harm of prostitutiton. Services directed at women exploited in the industry need to be resourced and exit routes to enable women to leave need to be made available.

Addressing the Questions

Those who promote the legalisation of the sex industry and oppose the criminalisation of the purchase of sex put forward a range of arguments which need to be challenged. This document attempts to briefly address some of those arguments with reference to an increasing body of Irish and international research and evidence which demonstrates the effectiveness of tackling demand by criminalising the buyer of sex and the negative consequences of making prostitution legal and legitimate.

"We need to focus on trafficking and forced prostitution and not on freely chosen prostitution."

Prostitution and trafficking for the purpose of sexual exploitation do not exist in separate, distinct realms but rather on a continuum of exploitation. Traffickers. agmig prostitution agencies collaborate in the commercial sexual exploitation of women and girls and are indiscriminate in relation to how girls and women are supplied to the market. They use a range of similar tactics including kidnapping, violence, coercion, deception and enticement and they share the same intention i.e. to ensure a continuous supply of women and girls to the sex industry. This is not to deny the different levels of abuse, violence and controlling tactics used against their victims. The degree of violation is of profound significance to each individual woman as is the extent to which she has any freedom or control over her existence. Sexual violation is intrinsic to all prostitution and ultimately constitutes "cruel, degrading and inhuman treatment" as defined within the European Convention on Human Rights. Therefore the Irish State has a responsibility to protect all women who have been violated in this jurisdiction not just those who have been trafficked into Ireland. The conviction of one Irish prostitution organiser reveals both the brutality and the profits of the Irish prostitution industry:

"Foreign women were effectively bonded into near slavery in 48 locations across Ireland and forced in many cases to hand up all of their earnings. He was about to open up brothels in South Africa especially for soccer fans travelling for the World Cup. He specialised in exploiting the poor and vulnerable. He boasted of an international property portfolio and seven-figure cash savings. A number of men, Irish based associates, controlled the brothels, ensuring that no customers were turned away. If the women did not comply with customer's requests during their 15 hour shifts in the brothels-10 a.m. - 1.a.m. - they were threatened and beaten."

(Irish Times May 8, 2010)

"Women make a 'free choice' to enter prostitution, they are not forced."

Freedom of choice is a misleading and inaccurate term when applied to the constrained and limited contexts in which girls and women enter prostitution. Gender inequality, globalisation, poverty, and the collapse of women's economic stability in poorer regions of the world are creating the conditions in which vast numbers of women are driven into the sex industry. Young women are persuaded to migrate to Western European countries for what they believe is

legitimate employment and a better life but are totally unaware that they have been targeted by prostitution agencies who will force them into prostitution in the destination country, (Kelly, 2002). Extensive research indicates that poverty, family homelessness, drug addiction and a history of physical and sexual abuse combine to make young women vulnerable to being recruited by pimps and traffickers, (Barnardos, 1998, and Zimmerman et al., 2006). A recent study of thirty five women and men in prostitution in Dublin revealed that all were dependent heroin users prior to entry into prostitution and a significant minority were minors at the time, (NACD, 2009).

Some women choose to enter the sex industry in the desperate hope of earning money for a period of time which will provide the means for themselves and their families to exit poverty. But this 'choice' can be compared to people in extreme poverty choosing to sell their organs, which has now been recognised by international human rights bodies as exploitation and has led to a full ban on trade in biological material. We need to extend the same understanding and protection to women who have "chosen" to survive by the sexual exploitation of their bodies, (Westerstrand, 2002). As survivors of prostitution state:

"Women do not wake up one day and 'choose' to be prostitutes. It is chosen for us by poverty, past sexual abuse, the pimps who take advantage of our vulnerabilities, and the men who buy us for the sex of prostitution."

(Manifesto, EWL Conference, 2005)

"Adults are choosing to sell sex. It is not the same as child sexual exploitation."

There is a critical need to introduce specific measures to eliminate all forms of child abuse including commercial child sexual exploitation. However, there is very little evidence that a separate market exists for children or young girls but rather that girls

and young women are integrated into the mainstream sex markets with current estimates suggesting that 10-30 per cent of trafficked females are minors, (Kelly 2002). Research indicates that the female prostitution market is sustained by adult women as well as under age girls, who are inserted into the same cycle of exploitation and intended for the same kind of customer and are considered as "interchangeable goods", (Monzini, 2005). Irish research revealed that 11 per cent of those trafficked into Ireland for sexual exploitation were minors at the time they were first trafficked, (Kelleher et. al., 2009). In the context of the commercial sex market research with sex tourists reveals that buyers are quite indiscriminate in using children, girls and women, (O'Connell Davidson & Sanchez Taylor, 1998). As Dr. Liz Kelly says:

"The simple fact is that where sex industries are tolerated, the sexual exploitation of children is facilitated......How can it be that on one day when the young person is 15 or 17 their involvement in the sex industry is exploitation and illegal, but on the next day—their birthday—when they are 16 or 18, this becomes not just legal but legitimate, a matter of choice, a form of work? What process can occur in 24 hours that transforms something inherently exploitative into an issue of choice and consent?"

(Kelly & Regan, 2000)

"Making the conditions of 'sex work' safer should be our main concern not the act of prostitution itself."

Concern regarding the violence and abuse women are subjected to in prostitution has led many people to focus only on attempting to make the conditions in which women are prostituted safer. This strategy fails to recognise that there is no safe environment in which to be prostituted and that being bought for sex is inherently damaging and harmful. The levels of physical and sexual violence experienced by women and girls in

prostitution are immensely higher than the general population. In one major five-country report on prostitution 80 per cent of women reported physical harm, 60 per cent reported sexual assault, and over 60 per cent had been subjected to emotional abuse and verbal threats, (Raymond et al. 2002). International research which conducted interviews with 207 trafficked women revealed severe levels of violence, 95 per cent of women had been subjected to physical or sexual violence with 75 per cent physically hurt and 90 per cent reporting sexual assault, (Zimmerman et al., 2006). The majority of women (89 per cent) also reported threats of violence to themselves, 36 per cent reported threats to their children and family and 77 per cent had no freedom of movement. One migrant woman in an Irish agency describes how little control women have over what is done to them:

"In this agency there were rich, older men. They wanted sex without condoms... everything that was not just normal sex... these men were crazy... one guy was a teacher. You had to dress up in a school uniform, no make-up... shave pubic hair and he would spank you and you would hit him. It was awful."

(Anara)

"Indoor managed parlours and brothels are safer and better for women than the streets"

There is ample evidence in Ireland and internationally of the level of violence that women in street prostitution experience. However, the idea that indoor managed brothels and apartments are environments for those being prostituted is increasingly shown to be false and misleading. Some studies indicate that women in indoor prostitution are less able to control the conditions and interaction with men. Women talk about being alone in a room with the customer, not being able to reject customers or warn each other, that they are not encouraged to report violence or prosecute violent customers and having to service pimps and guards, (Farley. 2004). Interviews with 103 male sex purchasers in the U.K. found that of the majority of men who had purchased sex in indoor facilities, admitted they were aware of pimping, trafficking, violence and coercive control over the prostituted women they purchased in massage parlours, brothels, and escort agencies, (Farley et al., 2009).

Women interviewed in Dublin described their experience with some agencies and the risks of indoor prostitution. They expressed their fears of call outs to hotels and the buyers' homes and not knowing what or who would be waiting for them. Some agencies said 'security' was on call at the apartments for 'protection' but women knew that they were in fact there to ensure that customers were satisfied. One of the women spoke of being severely beaten by a security man when a customer complained that she would not do as he asked, (Kelleher et al., 2009):

"It felt like a prison, no time for lunch and I was on call 24/7. I saw between five and seven men a day, with occasionally a day off – but never a Saturday or a Sunday. There was no choice about which men you saw and some men wanted sex without condoms. If you refused to have anal sex you had to pay a penalty or the 'security' men would beat you up."

(Isobel)

"Harm reduction strategies are the most effective."

Health care is a vital part of responding to the needs of women in prostitution. International research has documented the harmful consequences of prostitution on the physical, sexual, reproductive and psychological health of women, (Farley 2004, and Raymond et al., 2002). Women presenting to the Women's Health Project (HSE) in Dublin display a range of health symptoms, including bacterial vaginosis, thrush, hepatitis A and B, urinary

tract infections and many other health conditions related to prostitution. These infections have serious, long-term implications with women facing constant worry and anxiety in trying to maintain and protect their health. To focus only on getting women in prostitution to insist on condom use and safe sex practice fails to recognise the reality of power and victimisation. The ICI research revealed that dangerous, unprotected sexual activities commonplace with a high proportion of buyers stating they had unprotected oral, vaginal and anal sex. There was increasing pressure on women to put their own health at risk and engage in high risk activities with bodily fluids:

"Men are constantly looking for sex without condoms, including anal sex, which I do not do... Men want more and more things... not just normal sex. I have to move around... I do not stay in any one place for too long as they will get to know by the reviews (posted on punter.net) that you will not do these things."

(Floria)

Sexual and reproductive clinics need to be part of an overall mental and physical health care strategy which recognises the inevitable harm of prostitution. Each contact with women through health care can be an opportunity to provide her with as much support and as many options as possible, including exit strategies.

"There is no place for a moral position regarding sex work, it is judgemental of sex workers."

It is legitimate to hold a moral position that buying a person for the purpose of sexual gratification is an act of sexual exploitation by the buyer and a violation of human rights. By not taking a position on the 'right' to prostitute girls and women we are in fact accepting the setting apart of a group of women and girls for the purpose of sexual exploitation where the normal legal

protection against violence and abuse do not apply, (Eckberg, 2004). One can hold an ethical and political view on the act and agent of sexual exploitation and still work nonjudgementally and respectfully with women in prostitution. Services can work with women on trying to protect themselves and their health whilst at the same time providing exit routes and working towards the elimination of prostitution. What we believe as service providers influences our interaction with individual women and has major implications on the principles and practice which underpin direct services to women exploited in the sex industry. Practitioners need clarity that holding the position that prostitution is a form of sexual exploitation is not inconsistent with a non-judgemental supportive service to women which respects their rights.

"A narrow focus on harm-reduction and safer sex is an inadequate and ineffective response to the needs of women in prostitution. Prostitution is a form of violence against women and sexual exploitation has devastating impacts on the health and wellbeing of women and girls. It is critical that our service develops a response that reflects this reality."

(Coordinator of Women's Health Project, HSE, Dublin)

"Sex work is a legitimate form of work and needs to be integrated into regular employment structures."

In legalising prostitution in 2002 the German government was attempting to define selling sex work as legitimate work and create conditions in which women were safer and had access to health insurance and pensions. They also believed that the enforcement of the law would ensure that criminal elements and traffickers would be targeted and effectively controlled. An extensive evaluation in 2007 indicates that none of these aspirations have been realised. In fact, there is no evidence that women are safer, only a tiny number of women have accessed health

insurance, the illegal sector continues to grow and profit and the people who have benefited most are the organisers and owners of the businesses, (Kavemann, 2007). Similarly in the Netherlands, famous for the red light districts in cities such as Amsterdam and Rotterdam, there is increasing concern and evidence that legalisation has not brought any more safety for women but rather a massive legal and illegal trade in migrant girls and women, (Kelly et al., 2008). The Dutch police believe that over 750 trafficking organisations operate in the country and that 90 per cent of women from East-Central Europe are trafficked, (Monzini, 2005). A review of prostitution regimes in nine countries concludes that:

"The inherent difficulties in integrating prostitution into formal employment laws and structures is the strongest evidence that this is not 'a job like any other', and efforts to treat it as such reveal a host of contradictions which neither law nor policy can resolve. This in turn compromises the ambition to enhance women's status, rights and safety."

(Kelly et al, 2008)

"Legalising brings a safer more controlled industry."

The Australian State of Victoria has now experienced over two decades of legalised prostitution. There was a set of assumptions underpinning the decision to legalise and belief that a regulated industry could:

- Contain the rampant growth of the highly visible brothel and street prostitution trade;
- Eliminate organised crime and the illegal sector:
- End sex trafficking and child prostitution;
- Provide more control and safety for women in prostitution;
- Protect public health because discouraging prostitution impeded AIDS intervention programs among prostituted women; and
- Eliminate harmful work practices by introducing occupational health and

safety standards for brothels and escort agency 'workers' standards that are guaranteed under international labour conventions to workers in the mainstream labour force.

The Victorian Government adopted a harm minimisation approach to tackling the social problems and human rights abuses that prostitution created. However, in every category, legalisation has exacerbated these harms and produced many of its own making. The actual consequences have been:

- Massive expansion of the legal (five times greater) and illegal sex industry (four to five times greater);
- Legal and illegal business are inextricably linked, for example by common ownership, legal brothels are laundering money for illegal ones and providing cover for trafficking and child prostitution;
- Increasing role of business and financial sector in the industry; huge investment and profits A\$ 1.78 million in 2004/5;
- Integration into the mainstream tourist industry for example the Sexpo annual trade show in now held in five capital cities with 65,000 visitors;
- Demand increase: approximately 3.1 million buyers per year in an adult male population of 1.3 million;
- Major increase in agencies supplying women and girls and minimal control by women themselves with 'pimping on a grand scale';
- Pressure on women to do anything demanded by the buyers by agencies;
- No evidence that violence and rape are less;
- Intensified commodification of women's bodies; and
- Encroachment of prostitution into public

(Sullivan, 2004)

"Buyers are looking for mutual, respectful, consensual sex."

Consent is not something one can buy. What money is buying is the right to override consent and obtain sexual gratification without the need to see another person as a real person. An analysis of over 1,000 reviews posted by men on Punter.net Ireland gives a clear indication of buyers attitudes. A consumerist discourse of getting good value for your money and of whether she was worth the price and did what was advertised pre-dominates. The physical attributes of women are discussed in detail and disappointment and anger are expressed if she does not measure up to the picture on the web, especially if she looks older.

Gratification of their own sexual needs is stated by most men as a justification and entitlement for buying sex with explicit detail of the sexual acts that took place posted on the site in graphic and aggressive language. There is high expectation that she 'enjoys' it and women are expected to feign reactions and desires that are sexually arousing to the buyer. Women who show disinterest get severely reprimanded in the reviews. Comments such as "she had no enthusiasm for the job", "I felt she was not at this very long", "she is very withdrawn", "she has made a bad career choice", "she is very mechanical" and "she is past her sell-by date" are common. Many stated that they want the woman to make the encounter a 'girlfriend experience' (GFE) but only in so far as she acts as if she is emotionally engaged and interested in them, not in any reciprocal relational way.

Fifty-five percent of the participants in the U.K. study believed that a majority of women in prostitution were lured, tricked or trafficked and 36 per cent said they thought that the women they used had been trafficked to London from another country. However, there is no evidence that this belief deters them from purchasing sex from

victimised women, (Farley et al., 2009). A quarter of the buyers believed that they could do anything to her once they had paid and that the concept of rape did not apply to prostitutes.

"Look, men pay for women because he can have whatever and whoever he wants. Lots of men go to prostitutes so they can do things to them that real women would not put up with."

"Men who are lonely and isolated need to buy sex."

The profile of men in Ireland who reported that they buy sex (one in 15) bears out international research that the majority (61 per cent) are married or in a relationship. They tend to be highly educated with incomes in the middle range. Many of the apartments where women are placed by agencies are in the financial and business sectors of Irish cities. A significant proportion of men buy sex during the daytime, particularly at lunchtime and in the evenings after work and presumably return home afterwards to to their partners and families, (Kelleher et al., 2009). Research with buyers consistently indicates that buyers have a high number of sexual partners in their lifetime with 77 per cent of the U.K. study participants reporting more than 10 sexual partners.

A study in Scotland which conducted 110 interviews with buyers also found that prostitution negatively impacts upon the the way men think about and behave towards non-prostituted women, (Mc Leod et al., 2008). They demonstate that the more frequent the prostitution use the more likely the participant was to have committed sexually coercive acts against their partners. Some of the interviewees themselves acknowledged that men's attitudes could be affected:

"Men think if they can buy a prostitute and treat her as an object, they can do the same with other women."

"Most of the men who go see it as a business transaction and don't see the girl as a woman. This could impact on how a man sees women in general."

Whilst the majority of interviewees in both studies believed in men's right to buy sex and that the majority of men did so, most men (59 per cent and 71 per cent) had ambivalent feelings of guilt and shame. Criminal sanctions and public exposure were considered to be the most effective deterrents whilst being asked to attend an educational programme was regarded as the least effective. The authors conclude that education programmes should be offered in addition to rather than as an alternative to legal sanctions.

"The Swedish model is repressive and punitive. Prostitution is a necessary and inevitable part of life."

Combating prostitution and trafficking for sexual exploitation has been a high priority of the Swedish Government for over a decade. Since 1999, the Swedish Government has defined prostitution as a form of violence against women and children and made the purchase of sexual services on the streets, in brothels or from escort agencies a criminal offence, (Ministry of Industry, Employment and Communications, Sweden, 2002.) The women and children who are victims of prostitution and trafficking do not risk any legal repercussions as they are considered to be exploited by the procurers and the buyers. The law in Sweden is not seen as merely punitive but rather it is declarative and normative, sending out a clear statement that prostitution is harmful not only to the individual prostituted woman or child, but also to society at large and contrary to Sweden's goal of achieving equality between women and men. The Swedish approach challenges the view that prostitution is inevitable and exists outside the parameters of ethics and the law. It seeks to give young men and women the message that buying a person for sexual gratification is not normal, acceptable or harmless behaviour. In Sweden, 85 per cent of the population of both men and women now support the law and see prostitution as unacceptable.

"We can succumb to resignation and base our actions against prostitution and trafficking in women on the idea that these practices are inescapable, necessary and something that will always exist and therefore should be accepted: because men need it, women 'choose' it, or because prostitution has always existed as the 'oldest profession in the world'. Or, we can firmly reject the idea that some women and children, mainly girls, should be seen as commodities that can be bought and sold. Instead, we must have a vision, like we do in Sweden, that it will, in fact, be possible to eliminate prostitution and instead create a society based on gender equality, a society in which prostitution and trafficking in women is seen as incompatible with the dignity and worth of the human person and the equal rights of men and women."

(Lise Bergh, State Secretary for Gender Equality, Sweden, 2005)

"The Swedish approach has failed and prostitution has gone underground."

The Swedish government established a highlevel Inquiry in 2009 to investigate how the criminalisation of the purchase of sex has worked in practice and what effect it has had on the incidence of prostitution and human trafficking over the past decade. The report of the Inquiry is extremely positive and concludes that the law has been an important instrument in preventing and combating prostitution and human trafficking for sexual The report recognises investigating such a secretive, criminal activity is complex and difficult yet it is confident that the results of their inquiry offer a clear picture of the current situation. They conclude that:

- Street prostitution in Sweden has halved since the introduction of the ban;
- In comparable countries, Norway and Denmark, the number of people in street prostitution has increased dramatically in the same period, three times higher than in Sweden;
- There is no evidence that prostitution has gone underground. Indoor prostitution including massage parlours, sex clubs and hotels has not increased;
- Internet prostitution has increased in all three countries over the past decade but is much more extensive in neighbouring countries;
- There is no indication that criminalisation has increased the risk of violence or worsened the conditions of those people exploited through prostitution;
- Trafficking is considered to be substantially smaller in scale than in comparable countries. The National Criminal Police believe the law has acted as a barrier to human traffickers and procurers establishing themselves in Sweden;
- There has been a marked change in attitude to the purchase of sexual services that coincides with making it a criminal offence to buy sex. There is now strong support for the ban on purchasing sexual services in Sweden (70 per cent-80 per cent); and
- The ban has proved to be an effective deterrent to sex purchasers.

The Inquiry recognises that criminalisation has to be part of an overall strategy and stresses the necessity of continued and sustained social work and resources for police and law enforcement. They recommend the establishment of a national centre to coordinate policies to prevent and combat prostitution and human trafficking for sexual purposes.

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