

# Has the Nordic Model worked? What does the research say?



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## Abstract

This article reviews the key research that has been done on the results of the [Nordic Model](#) approach to prostitution in the countries in which it has been implemented, and provides a summary of the findings.

All of the studies show evidence of a significant reduction in men's demand for prostitution. Although accurate estimates of the size of the population engaged in prostitution are difficult, the evidence suggests a reduction in the numbers involved over the medium and long term. Where the sex purchase ban is enforced, the sex trade becomes less viable and this discourages sex trafficking and pimping. One researcher went as far as to suggest that the sex purchase ban might be more effective in combating pimps and sex traffickers than laws that target them directly.

While there is no clear evidence that the police are violent towards those engaged in prostitution, they do tend to target undocumented migrants and report them to the immigration authorities for potential deportation. Clearly this is unacceptable and states need to provide better support and assistance to foreign nationals who have been used and abused in the sex trade within their territory.

All the studies indicate a very high rate of violence towards the people in prostitution, but there is no definitive evidence of any actual increase due to the sex purchase ban. Similarly claims that the sex purchase ban has driven prostitution underground and made it more dangerous are not supported by the research. Rather the evidence underlines the fact that prostitution is always dangerous.

## Note about terminology

In this article I mostly refer to people involved in prostitution as women, for linguistic simplicity and because the vast majority are in fact female. However, please understand it to also include men, boys and trans people.

## Introduction

The [Nordic Model](#),<sup>1</sup> or sex purchase ban, is currently in force in seven jurisdictions – Sweden, Norway, Iceland, Canada, Northern Ireland, France, and the Republic of Ireland (ROI) – and it is soon to come into effect in an eighth state, Israel. In each jurisdiction, the legal reform was accompanied and followed by fierce battles between supporters of the sex trade and abolitionists. The intensity of the struggle, the emotions surrounding the idea of attempting to bring an end to prostitution, and the tremendous resources invested in both promoting and resisting the law, motivated scholars and policymakers to research the innovative legal framework.

Twenty years since the law was first passed in Sweden, and ten years after it was enacted in Iceland and Norway, several studies have been conducted to evaluate its implications:

- To the best of my knowledge, there have been no extensive studies or governmental reports in two of the Nordic Model countries, Iceland and Canada.
- France (Le Bail & Giametta, 2018) and Northern Ireland (Ellison, Ní Dhónaill & Early, 2019) have published one report each, with the Northern Ireland report partly referring to the Republic of Ireland.
- In Norway, there has been one official report (Rasmussen, Strøm, Sverdrup & Wøien Hansen, 2014) and one private study with a relatively large sample of 123 participants (Bjørndahl, 2012).
- Finally, in Sweden, the pioneer country, there have been numerous governmental reports (Ekberg, 2018; Stø & Håland, 2013) and academic studies (Kuosmanen, 2011; Vuolajärvi, 2019).

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<sup>1</sup> <http://nordicmodelnow.org/what-is-the-nordic-model/>

- Amnesty International (2016) published a controversial document about [Norway](#).<sup>2</sup> Despite its various ethical and methodological limitations, I examine its findings.

Amnesty International's paper wasn't the only biased one. The more you read in-depth research, articles, and reports dealing with the implications of the Nordic Model, the more you understand how the use of widely accepted research tools does not guarantee objectivity. Over time, I learned to recognize the report writer's general attitude about the Nordic Model from reading the abstract, or even just the title.

The pool of tactics available to a biased researcher is endless. I have found studies where the implications of the law for 'sex workers' are collected with the assistance of, or directly from, sex trade lobby organizations – NGOs and commercial entities, whose very existence is threatened by the Nordic Model (Ellison et al., 2019; Le Bail & Giametta, 2018). In other research, the vast majority of subjects came from the margins of the sex industry, particularly illegal immigrants in street prostitution (Le Bail & Giametta, 2018). Of course, it is important to give voice to marginalized groups, but this bias is something that the reader should be aware of. Sometimes the data on the violence in the sex trade is presented as the result of the law, even though nowhere in the study is a causal relationship proven (Amnesty International, 2016; Bjørndahl, 2012; Ellison et al., 2019).

I have also looked at theoretical articles – often full of factual assertions, but when you examine the supporting references, you find they are opinion pieces. Obviously, quoting someone else's personal opinion in an academic article is a legitimate and acceptable practice. However, it is extremely challenging having to check dozens of references to understand whether the source of a definitive statement is solid research, the opinion of an NGO purporting to represent 'sex workers' while lobbying for full decriminalisation of the entire sex trade, or the theory of a gender researcher.

Intentionally biased sources are often used by various actors with an economic or political interest in a particular type of legislation. This is a problematic and even harmful practice. As an activist with a clear and coherent view of the sex industry, I am also aware of my ideological bias. Therefore I will present the findings as well as my criticism of them, with a clear distinction between both.

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<sup>2</sup> <http://nordicmodelnow.org/myths-about-prostitution/myth-amnestys-research-in-norway-has-proved-the-nordic-model-is-harmful-to-sex-workers/>

## Sex Purchase Ban: Pros and Cons

The Nordic Model has explicit purposes and objectives. Some of the purposes are difficult to measure in the short term, such as improving both equality between men and women and the understanding of free consent in sexual relations. The concrete targets that can be measured in the medium term include a reduction in the purchase of sex and the numbers of women in the sex trade, an increase in the percentage of women successfully exiting the sex trade, and improvement in women's access to rehabilitation.

Opponents of the Nordic Model claim that not only did it not achieve its goals but it has also had negative consequences. They say the sex trade has gone "underground" to hidden and dangerous places, and that the sex purchase ban has: increased structural violence against women in prostitution; worsened poverty among women in prostitution; increased third parties' power over the women; led to a rise in negative stigma towards women in prostitution; caused disproportionate harm to undocumented immigrants in the sex trade; and finally, increased women's exposure to punter violence – either because "good customers" no longer buy sex or due to the "criminalized environment" of the sex trade.

Have the goals been achieved? Did the gloomy forecasts come true? Let's see what the studies found.

### Have the goals of the Nordic Model been achieved?

#### Is there a decrease in the purchase of sex?

Opponents of the sex purchase ban tend to argue that it does not reduce men's tendency to pay for sex, while its supporters argue otherwise. However, most studies confirm the supporters' claim. 'Dangerous Liaisons' (Bjørndahl, 2012, pp. 32, 36-37) repeatedly refers to the reduction in customer volume, as does the Vista report. The decline of the Norwegian sex industry immediately after the law was particularly significant. Between 2007 and 2008, many European countries were hit by the global financial crisis, but Norway remained financially stable. As a result, the sex industry could be expected to have thrived in Norway at that time, but this did not happen, probably due to the sex purchase ban (Rasmussen et al., 2014).

The French report refers to the rapid reduction in the number of punters as an undesirable phenomenon, because it affected earnings from prostitution (Le Bail & Giametta, 2018, p. 6). This decrease (by one-half to two-thirds) is mentioned repeatedly in the French report and is based on the responses of the women they interviewed (Le Bail & Giametta, 2018, p. 37-38).

Researchers note that the online purchase of sex has reduced to a lesser extent, but they don't provide an estimate of by how much.

In Sweden, the decline in buying sex is reflected in the comparison of two studies: in 2008, 8% of men reported paying for sexual services (Kuosmanen, 2011), compared with 13% before the law was enforced (Månsson, 1996, in Holmström & Skilbrei, 2017). In Northern Ireland and ROI, the trends are similar: 53.5% of the respondents in NI and 54.2% in ROI reported that “they will continue to do this with the same frequency as before”; 27.1% of respondents in NI and 28.8% in ROI said that “they will continue to purchase sex albeit slightly less frequently”; and 11.6% of respondents in NI and 10.8% of clients in ROI reported that “they had stopped purchasing sex or the law was likely to make them stop purchasing sex completely.” (Ellison et al., 2019).

Some scholars question this data, suggesting that biases might exist. For example, the purchase of sex might be underreported as a result of it becoming illegal and the change in the public atmosphere. However, it is argued that bias may be minor when surveys are anonymous (Holmström & Skilbrei, 2017, p. 88). I suggest that the same legal and public climate that makes people ashamed to report the purchase of sex might also reduce the habit itself, at least in some men.

In summary, the reduction in demand is supported by the findings of many studies, regardless of the researchers' attitudes or research methods.

### Are there fewer women in prostitution?

All the studies lack a reliable evaluation of the population in the sex trade. This is not surprising, because people in the sex trade constitute one of the most marginalized and hidden social subgroups. Even countries with a legal sex trade (such as the Netherlands, New Zealand, and Germany) have no stable and reliable estimates for the number of people in the sex trade.

The ‘Dangerous Liaisons’ report (Bjørndahl, 2012, p. 32) and the French report (Le Bail & Giametta, 2018) suggest a change in the relationship between punters and women in the sex trade so that there are fewer punters per woman than previously. In addition, the comparison between the findings of Skilbrei & Tveit (2008) and Rasmussen et al. (2014) indicates a 25% reduction in the population in prostitution.

The Northern Ireland report suggests that there has been no significant change in the number of ‘sex workers’ advertising their services online from 2014 – 2018: “There has been little change in the volume of ‘sex workers’ who advertise per day (308 on average).” At the same time, the report claims that street prostitution has been cut in half and the “sex working”

population in Northern Ireland is now almost exclusively based online (Ellison et al., 2019, p. 38). The same report mentions 88 brothels that had been operating in Northern Ireland in 2011. The overall conclusion is that one subdomain of the sex trade stayed the same, while the others have declined.

In Sweden, during the first decade after the introduction of the Sex Purchase Act, the online sex trade increased, not because of the law, but because of the general trend of rising Internet penetration. However, the “number of individuals sold via Internet web pages/web advertising was much larger in similar, neighbouring countries such as Denmark and Norway” (Ekberg, 2018, p. 37).

In summary, it is challenging to estimate the size of the population in prostitution; hence our conclusions should be cautious. It can be argued that in the medium and long term, the number of people in the sex trade has decreased, but it is not clear to what extent.

How did the sex purchase ban affect third parties (i.e. pimps)?

Proponents and opponents of the Nordic Model have had a long disagreement about the effect of the sex purchase ban on the power of third parties. Opponents insist that due to the difficulty of obtaining customers, more women rely on third parties (Amnesty International, 2016). ‘Dangerous Liaisons’ gives both sides a reason to think that they are right. On the one hand, some mediators “had to close their massage parlour as a result of increased control of the commercial space.” (Bjørndahl, 2012, p. 33). On the other hand, due to property owners’ refusal to rent apartments to women from countries known as sources of trafficking, some of these women had to rent apartments using a third party of Norwegian origin (Bjørndahl, 2012, p. 49).

The Vista report, which focused explicitly on the viability of human trafficking in Norway, shows that in the past, Nigerian traffickers placed a debt of 50,000-60,000 Euros on trafficked women upon arrival in Norway. Now, that debt has dropped to 40,000-45,000 Euros. “Given that Norway is an attractive market because of bad times elsewhere in Europe, the lower payment to come to Norway is a clear indication that earnings are not like they were before.” (Rasmussen et al., 2014, p. 81). Therefore, it can be hypothesized that, following the prohibition of prostitution, the power of third parties decreased, and the profitability of sex trafficking in the country diminished.

Le Bail & Giametta (2018, p. 41) suggest that the power of pimps might have increased, yet some of the women they interviewed said they had considered seeking a pimp but decided against it (p. 42). It is unclear, however, how much pimps and traffickers will want to stay and continue to operate in a country with such a reduced demand for paid sex. The report from Northern Ireland claims the disappearance of street and brothel prostitution and a move

online. However, the big virtual platforms are third-party businesses – so it's not possible to draw any firm conclusions about the power of mediators.

In conclusion, it can be seen that the feasibility of engaging in the sex trade has declined in the Nordic Model countries, and this encourages sex traffickers to consider alternative targets – countries with different legislation. Legislation affecting the viability of sex trafficking may have been more effective in combating pimps than the law that targets them directly.

## Do women have access to rehabilitation?

None of the studies made a significant attempt to estimate the size of the population recovering from prostitution. Norwegian reports (Bjørndah, 2012; Rasmussen et al., 2014) mention various aid centres, such as Pro Sentret (Oslo Municipal Body), ROSA (Re-establishing residence, Security, Assistance, funded by Ministry of Justice) and Natthjemmet. Bjørndah (2012) does not mention rehabilitation programmes, which she did not research.

The French study addresses the government's direct rehabilitation programme and criticizes it. "Less than 40% of those surveyed were aware of the existence of the exit programme and, of that minority, only 4.8% have taken steps to apply, and a further 26.3% intend to apply in the future" (Le Bail & Giametta, 2018, p. 90). Le Bail & Giametta (2018) notice that the rehabilitation programme doesn't suit the needs of undocumented immigrants, who considered it only as a way of extending their residency visas. Part of the criticism was that the programme is targeted solely at people who have already exited the sex trade. The researchers see this as a bittersweet and draconian.

In my view, this criticism stems from a misunderstanding of the rehabilitation process and its nature. Mixing exited and non exited people in one rehabilitation programme can be detrimental and demoralizing. The needs of the two populations are different. In my city, support services can be found for both groups, but they are separate services. Recently exited women, who have begun the process of healing the trauma and leading a normative life, are assisted separately from those who are still making a living from the sex trade and therefore need to preserve their vital survival mechanisms.

Also, an illegal immigrant rehabilitation programme will usually target quite different needs from those of the local population. Immigrants need psychosocial services and trauma care, which are essential everywhere. The local women also need relevant employment skills in the current state. It is important to note that rehabilitation programmes cannot be a route to obtaining a residence permit for those who are not interested in rehabilitation. Rehabilitation is a challenging, lengthy, expensive, and not always effective process. It is probably unwise to invest the considerable resources that rehabilitation requires in those who are not yet ready

for it. There must be an alternative way for migrant victims of trafficking to get a residence permit.

Ellison et al. (2019) note that rehabilitation programmes do not exist in Northern Ireland, where only general services are available. Neither France nor Ireland made any attempt to check private and municipal support and exit programmes. Ekberg (2018, p. 37 – 38) mentioned support and exit services in Sweden: “The Swedish social services and administrative system is decentralized. This means that the primary responsibility for the well-being of any crime victim [...] is firmly placed on the 290 Swedish municipalities. [...] Such support may include sheltered accommodations, financial assistance, interpretation, and psychosocial support”. Municipal prostitution services operating in Stockholm, Gothenburg, and Malmo provide outreach services for individuals involved in any pattern of prostitution, and include counselling, access to health care services, and exit programmes.

Research into exit and rehabilitation trends in the Nordic Model countries is severely lacking. This topic is close to my heart, yet I have not been able to find data about successful rehabilitation. At least five different exit routes are indicated:

1. Women who exit the sex trade through specific government programmes designed for sex trade survivors.
2. Women who exit the sex trade through municipal programmes, similar to those prevalent in Sweden and Norway.
3. Women who exit the sex trade with the help of private NGOs.
4. Women who rely on the general governmental and/or municipal services and allowances to exit the sex trade: disability benefits, vocational training courses, local welfare bureaux, and more. The data on these women is difficult to collect.
5. Women who exit the sex trade without any institutional assistance. These women might build a normative life in their communities without anyone recognizing them as ‘rehabilitated survivors.’ They may suffer both mental and physical harms, and may get help to deal with those harms from a therapist, a social support group, and/or the family circle. Their rehabilitation route is not documented, and they can only be reached through other prostitution survivors or activist groups, if at all.

In each of these categories, the Nordic Model has a potentially positive impact on rehabilitation. Banning demand for paid sex helps women to frame themselves as victims of crime rather than as a failure, and also facilitates creating a more supportive environment. Thanks to that, more women are not only turning to government and municipal programmes

but also finding powers within themselves to change their lives. In recent years, as Israel has progressed toward the sex purchase ban, I have seen how exiting the sex trade has become a positive model of self motivation, struggle, and success. A study on the rate of rehabilitation in each of the categories is likely to yield valuable results.

## Does the Nordic Model have any negative effects?

### Was there a rise in police violence?

Opponents of the sex purchase ban repeatedly argue that it creates a criminalised environment that exposes the already vulnerable population in the sex trade to extreme police violence. What do the studies and reports say?

The ‘Dangerous Liaisons’ report mentions “increased judicialization,” but not an increase in police violence (Bjørndahl, 2012, p. 32). The French report refers to pressure on people in street prostitution to report clients (Le Bail & Giametta, 2018, pp. 6, 32) and police targeting undocumented immigrants (Le Bail & Giametta, 2018, p. 6, 46). This might indicate some negative consequences of the sex purchase ban, but most readers would not call this “violence.” The Northern Ireland report mentions the existing mistrust between the population in prostitution and the police (Ellison et al., 2019, pp. 154 – 157), and that undocumented immigrants fear being deported if they are exposed to the police.

Amnesty International (2016) reports high-level surveillance by police (p. 46), invasive treatment by police (p. 47), and racial profiling (pp. 48 – 49). Vista findings are similar: while local women in prostitution receive more thoughtful treatment, undocumented immigrants fear deportation.

In summary, the police do not appear to be “violent” towards the population in prostitution, but enforcing the three laws together (anti-trafficking law, ban on pimping, and the sex purchase ban) exposes undocumented immigrants to an increased danger of deportation. Immigrants with visibly different ethnicities are the most vulnerable.

### Was there a rise in punter violence?

The rise in punters’ violence towards women in the sex trade is frequently mentioned as an unwanted consequence of the Nordic Model. Those who claim this say that research indicates an increase in punters’ violence towards ‘sex workers,’ sometimes mentioning specific studies. However, when I read the papers beyond the abstract, I do not find any solid evidence for this claim.

The Norwegian report ‘Dangerous Liaisons’ by Ulla Bjørndahl focuses on violence against women in prostitution. The report compares data from a 2007 study with data from a 2012

follow-up study. In both studies, women in prostitution were asked about the prevalence of violent events they were exposed to. The basis for comparison was loose, however, because in the first survey there were 1,200 women, while in the second on there were only 123 women, who came from very different backgrounds. However, given the difficulty of researching the population in prostitution, this limitation can be considered an inevitable constraint.

The study's abstract includes the following statement: "women who sell sex in Oslo [are] a group where many have been exposed to extreme violence in the last 3 years. A frequency of extreme violence this high is seldom seen among such a small group in Oslo [...] The market is characterized by increased judicialization, which means that sex workers are more controlled by the government and therefore perceive themselves to have been increasingly criminalized." A reader who has no time to read the report's entire 50 pages will conclude that the violence against the women has been aggravated by the sex purchase ban.

However, when you look at the complete report, another picture emerges. It can be seen that the 2007 study provides strong evidence for severe violence against women in the sex trade. Sample distribution to ethnic groups shows that women from Thailand and Nigeria experienced more violence after the sex purchase ban, while women from Norway, a group that reports the highest rate of violence in general, experienced less violence after the ban (Bjørndahl, p. 12). Most of the increase in violence was experienced by foreign women. Therefore the intervention of trafficking networks should have been examined, but it wasn't.

The report includes numerous categories of different types of violence and whether the 2012 study showed an increase or decrease in the violence within each category compared to the 2007 results. In 11 categories, there was an increase after the sex purchase ban; in 10 categories, including the most serious forms of violence, there was a decrease; and in 3 categories, there was no change, or they were not measured in the previous survey.

	Total 2012	Total 2007/08		Total 2012	Total 2007/08
Unwanted touching	48 % ↑	39 %	Struck with fist	18 % ↓	29 %
Verbal abuse	48 % ↑	41 %	Trapped	18 % ↓	27 %
Threats/force	38 % ↑	35 %	Murder attempt	15 %	2 <sup>a</sup>
Shoving	34 % ↑	33 %	Rape	15 % ↓	29 %
Threatened with weapon	33 % ↑	22 %	Biting	15 % ↑	6 %
Hair pulling	32 % ↑	12 %	Thrown objects	15 %	2 <sup>a</sup>
Threatened/forced into sex that was not agreed to	27 % ↓	35 %	Kicked	15 % ↑	12 %
Restrained	25 % ↓	49 %	Thrown from car	14 % ↓	18 %
Robbed/attempted robbery	23 % ↓	31 %	Other	10 %	10 %
Stranglehold	19 % ↑	18 %	Pinched	4 % ↓	10 %
Struck with open hand	19 % ↓	27 %	Scratching	4 % ↑	2 %
Spat on	19 % ↑	12 %	Burnt	3 % ↓	4 %

The conclusion about the causal relationship between the sex purchase ban and violence towards women in prostitution was mostly based on beliefs or assumptions. Assistance centre employees interviewed by Bjørndahl (2012, p. 30) claimed that “they believed they would be more exposed to violence after criminalization of the purchase of sexual services [...] prostitution would become more hidden, that the market would mostly become controlled by the criminals via pimps, facilitators, and human trafficking, that the police would no longer be able to keep track, that the women would be afraid to report violence, that the official support services would become weakened, and that the ‘decent’ clients would disappear and the ‘mean’ clients would remain.”

These beliefs and assumptions may sound logical, but like any assumptions they need to be challenged. The argument that the law empowers criminals (pimps, facilitators, traffickers) suggests that independent prostitution will be replaced by pimped prostitution. That said, most of the women in the survey (and in the Norwegian sex trade in general) came from countries, such as Thailand and Nigeria, that are well known as sources of sex trafficking. The presence of [Nigerian](#),<sup>3</sup> [Thai](#),<sup>4</sup> and Eastern European trafficking networks has previously been proven and [well researched](#).<sup>5</sup> It is naive to assume that before the sex purchase ban most

<sup>3</sup> <http://www.hrw.org/report/2019/08/27/you-pray-death/trafficking-women-and-girls-nigeria>

<sup>4</sup> <http://www.refworld.org/docid/5b3e0a604.html>

<sup>5</sup> <http://www.state.gov/reports/2018-trafficking-in-persons-report/>

of the women in the Norwegian sex trade were there solely as a result of their own personal initiative.

Another assumption was that the reporting period in the 2007 study was longer: “it is important to remember that the two studies dealt with very different time frames. The numbers from 2007/08 represent experiences with violence throughout an entire career in prostitution (which could be anything from one day to 50 years), while the numbers from 2012 show the violence experienced by people who have been active in prostitution in a longer or shorter period since January 2009” (Bjørndahl, 2012, p. 22).

Have you ever met someone who was in prostitution for 50 years? I haven’t. Even if any apparent recall bias is ignored, I can’t assume that the average reporting period in 2007 was longer than three years, as “many foreign women who practice prostitution in Norway reside here in a short time” (Rasmussen et al., 2014, p. 58). Therefore, this assumption seems to be an attempt to base the conclusion on data that does not necessarily justify it.

In summary, Bjørndahl (2012, p. 46) agrees that “This data does not answer whether the high amount of violence and the vulnerability women in prostitution experience is caused by the criminalization of the purchase of sexual services or other factors. [...] Whether the sex purchase law has led to changes in the prevalence of violence among those who sell sex in Norway is something we will most likely never know.” Other Norwegian reports back this statement. “Even so, this analysis finds no clear evidence of more violence against women in the street market after the introduction of the law” (Rasmussen et al., 2014); “it is beyond the scope of this report to measure whether violence experienced by sex workers has increased in Norway” (Amnesty International, 2016, p. 53).

The Northern Ireland report claims to present data indicating “an increase in reporting incidents of violence” and “a sense of excessive violence.” (Elliott et al., 2019) – but [none of this data](#)<sup>6</sup> proves that violence against the prostitution population has actually increased. Moreover, the data sources were dubious. The findings related to ‘sex workers’ were mostly collected through two lobbying organisations: SWAI and Ugly Mugs.ie, both of whom are actively struggling to cancel the Nordic Model and promote the full decriminalization of all aspects of the sex trade instead. One of these organisations, Ugly Mugs.ie, has [links to individuals](#)<sup>7</sup> who have been convicted in the Irish courts for pimping or similar offences. But

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<sup>6</sup> <http://nordicmodelnow.org/2019/11/21/response-to-the-queens-university-belfast-review-of-the-operation-of-northern-irelands-sex-buyer-law/>

<sup>7</sup> <http://nordicmodelnow.org/2019/11/21/response-to-the-queens-university-belfast-review-of-the-operation-of-northern-irelands-sex-buyer-law/>

even after using the data from such biased sources, the report couldn't show clear evidence of rising punter violence.

The French report comes to very similar conclusions using nearly identical methods of data collection. The abstract states that “violence, of all kinds, have increased: insults in the street, physical violence, sexual violence, theft, and armed robbery in the workplace” (Le Bail & Giametta, 2018, p. 7). According to the same report, “in terms of serious violence, the situation is much more difficult to analyse. All the organizations had the feeling that reports of physical and sexual violence had increased” (Le Bail & Giametta, 2018, p. 49).

Further reading reveals the substantial methodological limitations of the French paper. The claims of increasing violence are based on its own survey or reports to relatively small NGOs (rather than reports to the authorities or large scale surveys). The first limitation stems from the fact that the visibility of those NGOs could have increased because of the public discourse surrounding the introduction of the sex purchase ban. The second limitation is that many of the interviewees (although the report does not mention exactly how many) were recruited from anti-Nordic Model, pro-sex trade organizations, like STRASS (Syndicat du travail sexuel). The questionnaires were distributed online, and the participants were asked: “Since April 2016, are you exposed to violence more than before/ less than before/ no change”. 45.5% of the participants responded “No observable change,” 42.3% responded “more than before,” and 9.3% responded “less than before.” Unlike ‘Dangerous Liaisons’, Le Bail & Giametta (2018) don't categorise the data on violence, which makes more specific conclusions impossible. Who became more violent: the punters, the traffickers whose profits declined, or the general public? Elliott et al. (2019) define “customer no shows” as one of the primary sources of clients' violence – which makes it clear that we need proper classification of the types of violence to draw any useful conclusions.

Descriptions of violence and risks to the population in prostitution are also found in Amnesty International (2016) and Rasmussen et al. (2014) but neither study provided solid evidence that violence had increased after the sex purchase ban. Violence in the sex trade is a tragic yet [well-known fact](#)<sup>8</sup> in a wide range of countries with different legislation.

Notably, many studies have reiterated the claim that conditions created under the Nordic Model impose additional risks to women in the sex trade. The women in street prostitution are now required to close “deals” quickly, thus being unable to perform a risk assessment (Le Bail & Giametta, 2018; Levy & Jakobsson, 2014; Rasmussen et al., 2014). I agree that these are serious arguments, even if there is no reliable and concrete data to back them up. That

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<sup>8</sup> <http://www.sexindustry-kills.de/doku.php?id=start#prostitution>

said, we should assess those additional risks to the small number of women currently in street prostitution against the benefits to the women who are able to exit the sex trade because of the sex purchase ban. Another argument suggests that the “criminalized environment” makes punters more violent. This theoretical claim has never been tested but I will address it in summary.

Despite repeated claims that the sex purchase ban has increased violence towards the population in prostitution, there are no reliable data actually to prove it. Some studies indicate a very high rate of violence towards the people in prostitution, but there is no definitive evidence of any actual increase due to the sex purchase ban. Evidence of the rise in violence reporting exists, yet the reports were collected by relatively small NGOs from the sex trade lobby that gained exposure during the Nordic Model campaign. In the past, people in prostitution might have been unaware of them, and therefore unable to report to them.

### Has prostitution gone underground and become more dangerous?

Before trying to answer this question, we first need to understand what we mean by the terms “underground” and “dangerous prostitution scene,” and to decide whether “underground” is indeed more dangerous. However, none of the studies define “underground.” The implication from the context is that the less visible the scene is to the police, the more underground it is. Following this logic, street prostitution is the most visible, brothels and massage parlours are less so, and prostitution that occurs in private apartments is the “underground.” But is street prostitution less dangerous just because it is visible? To my knowledge, this is not the case, and in fact the opposite is usually assumed: street prostitution is generally considered the most extreme, the most violent, and the last resort of women in the sex trade.

If the sex purchase ban drives the sex trade underground, then following the ban, the sex trade will switch from the street to the Internet: from the visible to the hidden. Ellison et al. (2019, p. 165) support this view: “the evidence suggests that the Sex Buyers Act is simply ineffective in combating online prostitution, where it remains unseen” (p. 165). According to Le Bail & Giametta (2018), since the entry into force of the sex purchase ban, the trade has moved to more dangerous places and the Internet (pp. 38, 44). However, it is difficult to say whether the Nordic Model was the main contributing factor in street prostitution switching online. In the last two decades, the sex industry moved online in both abolitionist and non-abolitionist countries. A 2010 Swedish report showed that since the sex purchase ban, there has been an increase in the online sex trade across Scandinavia, not only because of the law but also (or mainly) because of the Internet boom. However, by 2008, the extent of online prostitution was greater in Denmark and Norway than in Sweden (in Norway the sex purchase ban did not come into force until 2009, and in Denmark, a completely different legal model exists) (Ekberg, 2018, p. 5).

The dark and remote areas of the public domain are called “underground,” as well. The participants of the Le Bail & Giametta (2018) research stated that they had to work in dark and remote areas, where the police cannot locate them. The Norwegian police disagree with these claims: “the prostitutes must be visible to customers. The term ‘going underground’ is, therefore, not appropriate. If customers find the prostitutes, so the police find them too”. (Rasmussen et al., 2014). It should also be mentioned that street prostitution activity never happens entirely in the visible, well lit public domain. The sexual nature of prostitution makes spending at least some time in dark, hidden corners inevitable. The danger of prostitution going “underground” therefore exists under any kind of regulation.

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The next question is: has the sex industry’s transition from the street to closed spaces, or “underground,” made it more dangerous? This question is more difficult to answer because each study defines “dangerous prostitution” in a different way. According to Bjørndahl (2012, p. 11), among those who work indoors less than half (43%) of respondents had experienced violence, while 76% of those who worked outdoors had. Seems like the visibility of street prostitution, extremely marginalized even in comparison to the sex trade in general, never protected it from violence, and it has always been disproportionately affected by crime.

In another place, Bjørndahl (2012, p. 30) notes that prostitution with a “mediator” is more dangerous than “independent” prostitution but goes on to argue that “individualization” of prostitution increases vulnerability: “One trend that is reported by many is that prostitution has become more individualized for some of the sellers in later years. Among those who work in massage parlors, it is reported that many have stopped selling sexual services in parlors, out of fear that they will be detected by the police. They now make an agreement to sell sex during the massage in the parlor, then meet the customer at a later time in their own apartment to perform the sexual services. This means that the service is often performed when the seller and customer are alone. This increases vulnerability.” (pp. 33-34). Those contradictions in the report along with many others (Stø & Håland, 2013) might be explained by inconsistent data interpretation by the “Pro Centre” staff who were interviewed.

The Internet was referred to as dangerous by Le Bail & Giametta (2018, p. 45). This is an intriguing claim. The Internet remains among the few communication channels where anti-sex trade laws are relatively difficult to enforce without a specific ban on the advertising of prostitution. The few exceptions include the US, where FOSTA SESTA legislation (2018) aims to reduce sex trafficking, and Israel, where the “Site Blocking Bill” (2017) allows removal of crime sites from the network. Both laws restrict the advertising of prostitution: FOSTA SESTA targets human trafficking, and the “Blocking Bill” targets so-called “third-parties,” or pimps.

In response to FOSTA SESTA (2018), Cunningham, DeAngelo & Tripp (2019) published a paper, “Craigslist Reduced Violence Against Women.” They insisted that “Craigslist’s ‘erotic services’ (ERS) section reduced the female homicide rate by 10-17 percent. The change was driven by street prostitution moving indoors and by helping sex workers to screen out the most dangerous clients”. It’s hard to call it serious research; the only proof of the link between the rate of murders of women and ERS was the fact that the murder rate dropped during the same period as the site was operating. Still, Cunningham et al. (2019) insisted that online advertising made prostitution (and women in general) safer. In Israel, when the authorities began to implement the site “Blocking Bill” and shut down 122 prostitution sites, a campaign was launched against this bill, relying on a similar claim that e-advertising reduces the risk and makes prostitution safer.

Ellison et al. (2019) offer several references regarding “dangerous” spaces. In one part of the report, they mention that ‘sex workers’ feel safer if they do not work alone (p. 160). Amnesty International (2016) also claims that ‘sex workers’ prefer to work together for safety (pp. 64-65). Yet in another part of Ellison’s report (p. 26), we learn that “the researchers did not under any circumstances endanger themselves by visiting places where organized crime takes place, such as illegal brothels.” Are brothels only safe for ‘sex workers’ but not for scholars?

The only area where there is agreement among all the researchers is regarding punters’ apartments. “I never go to private homes – and definitely never the first time you meet a customer. I don’t know what’s going to meet me there. Your own apartment and hotels are much safer than a customer’s apartment” Amnesty International (2016, p. 63). “I know my apartment; I would never go to the client’s place. I don’t know where it is, if he lives alone, if he’ll be alone in the apartment or if anyone is hiding. At my home, it’s not the same. I am alone, I know the place” (Le Bail & Giametta, 2018, p. 46). On this there is a consensus: punters are violent.

In conclusion, we have no agreed definition of “dangerous prostitution,” except for clients’ apartments, which are always presented as dangerous. In reports aimed at illustrating the harms of the Nordic Model, “safe” prostitution is usually defined as the practices harmed by the law. Street prostitution, mediated prostitution (brothels, apartments, and massage parlours), Internet prostitution, and prostitution in the woman’s apartment are defined as “more dangerous” in various sources, while some reports even contradict themselves.

The reality is that prostitution is always dangerous, but each of the scenes has unique risk factors.

## The Nordic Model and undocumented migrants

The harm caused to undocumented migrants is often mentioned in reports and studies. This is important, “as the majority of people who sell sex in the Nordic region are migrants – 70% to 80%” (Vuolajarvi, 2019). The Amnesty International (2016) report addresses in detail the persecution that undocumented migrants face in the sex purchase ban era. For example, the Norwegian police are blamed for targeting undocumented migrants in the sex trade with the aim of identifying and deporting them. Those migrants are therefore denied the option of reporting punter violence to the police, because of the risk of deportation. Women from non-EU countries without work permits are especially vulnerable and persecuted.

It is worth noting that no legislative model offers a labour migration route for “employment” in the sex trade. New Zealand and New South Wales (NSW), which are consistently praised for their liberal legislation (Vuolajarvi, 2019), do not allow migrant workers to engage in prostitution. They will also be deported if caught. In Western European countries with a legal sex trade, such as Germany, it is easier for immigrants to stay if they are from Eastern European countries that are members of the EU. Women from other countries, particularly those considered sex trafficking source countries, such as Thailand and Nigeria, face precarious conditions. As a result, “more than 80% of the women working in the brothels are Eastern European or Asian, most of them illegal immigrants” (Stø & Håland, 2013, p. 1).

Yes, the same 80% as in the Nordic countries, but in Norway, we have 80% out of 2,500, in Sweden 80% of 1,000 and in Germany, we have about 80% undocumented migrants out of 400,000 (or 900,000 depending on [which estimate](#)<sup>9</sup> you fancy) .

The main difference between being an undocumented migrant in the sex trade in Sweden and Norway seems to be the transparency, as under the sex purchase ban, we have “increased judicialization [...] greater focus on the use of various laws to regulate and reduce the prostitution market.” (Bjørndahl, 2012, p. 32). In France, the research participants mention “episodes of police intimidation including being pressured to report clients and, if undocumented, threatened with deportation if they do not comply” (Le Bail & Giametta, 2018, p. 6). Both Amnesty International (2016) and Le Bail & Giametta (2018) address “racial profiling,” as many of the women in prostitution came from countries with visibly different ethnicities: China, Nigeria, Thailand. Le Bail & Giametta (2018) address undocumented immigrants’ difficulty in proving they work in France, since “sex work is not recognized as work” (before the sex purchase ban, “soliciting” was an offense, in case anyone

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<sup>9</sup> <http://nordicmodelnow.org/2019/01/13/prostitution-law-in-germany-regulation-for-taxation/>

forgot). Finally, Ellison et al. (2019, p. 159) report that illegal immigrants in the sex trade fear deportation, and so they stay away from the police.

It appears that the relationship between the three laws: the prohibition against trafficking, the ban on pimping, and the sex purchase ban (Rasmussen et al., 2014) may result in the deportation of undocumented immigrants who engage in prostitution. Vuolajarvi (2019, p. 151), an opponent of the Nordic Model, addresses this issue extensively: “When the majority of people who sell sex in the region are migrants, the regulation of commercial sex has shifted from prostitution to immigration policies, resulting in a double standard in the governance of national and foreign sellers of sexual services. Client criminalization has a minor role in the regulation of commercial sex in the area, and instead, migrants become targets of punitive regulation executed through immigration and third-party laws. Nationals are provided social welfare policies to assist the exit from commercial sex such as therapeutic counselling, whereas foreigners are excluded from state services and targeted with punitive measures, like deportations and evictions.”

I agree with Vuolajarvi (2019) that the Nordic Model cannot simply be replaced by deportation policies. This idea, if implemented, can never solve the problem. So long as the demand is not suppressed, the sex industry will always find another subgroup of vulnerable women to trade. I don't know what the optimal policy is for Vuolajarvi (2019), but I believe that care and assistance should be provided to foreign nationals, whenever the state has not been able to prevent their exploitation in its territory.

In Israel, there is a rehabilitation and assistance programme for trafficking victims, which lasts for a year. The Israeli welfare system is not too generous, to say the least, so I was not surprised to find that in Scandinavia, aid to trafficking victims is more comprehensive. In Sweden, time-limited permits may be issued to a victim or a witness of human trafficking for any purpose to conclude a preliminary investigation or the main proceedings in a criminal case (Ekberg, 2018, p. 17). The victims are eligible for municipal services that may include sheltered accommodation, financial assistance, interpretation, and psychosocial support. In some cases, and in addition to court-ordered compensation, victims of human trafficking may be eligible for payment from the Crime Victim Compensation and Support Authority (CVCSA), whose main task is to administer and pay criminal injuries compensation, i.e. compensation from the state to crime victims (Ekberg, 2018, p. 18).

I don't think the Nordic Model's opponents support the humanitarian aid solution. Many of their articles strongly oppose the perception of undocumented migrants as victims (Le Bail & Giametta, 2018; Levy & Jakobsson, 2014; Vuolajarvi, 2019). These researchers define undocumented migrants in the sex trade as “migrant sex workers,” whom the law interferes with in their attempts to earn a living. Some simply ignore red flags that come up in

interviews – such as the countries of origin that are regularly identified as a source of the trade such as China and Nigeria, or repeated mentions of “the debt” to be paid (Le Bail & Giametta, 2018). Some argue that treating those migrants as victims harms them more than prostitution itself (Levy & Jakobsson, 2014). This forced victimization denies the “migrant sex workers’ agency” and encourages them to pose as victims despite not being such. “Research has also shown that some migrants who sell sexual services have claimed victimhood status have done so to gain access to resources and avoid deportation, further complicating the findings of sex trafficking prevalence rates.” (Levy & Jakobsson, 2014; Mai, 2016, in Kingston & Thomas, 2018, p. 8).

### Did the power balance shift towards clients?

Several reports have highlighted that banning the purchase of sex has made women more vulnerable, competing for a smaller number of clients, and they are therefore forced to agree to clients’ requirements that they could previously refuse (Bjørndahl, 2012; Le Bail & Giametta, 2018). Le Bail & Giametta (2018, pp. 38-40) devoted a chapter to the consequence of the shift in power balance and addressed two implications: lower prices and giving up boundaries, which means agreeing to perform acts the woman has not previously agreed to.

It is unclear whether the shift happened due solely to the ban or to the sweeping change in public opinion. It can be seen in Le Bail & Giametta (2018, p. 6) that “the impact was felt even before the application of the new law, due to the mediation of this issue during parliamentary debates.” The Israeli experience is similar: the Sex Purchase Act passed here at the end of 2018 but it is not expected to take effect until June 2020, but there are repeated claims that the number of customers has already been drastically reduced. It seems that the media debate about the harms of the sex trade, which included the testimonies of its victims, has convinced some customers to withdraw.

In France, Le Bail & Giametta (2018) describe a very harsh reality of their interviewees under the law. Reducing the number of clients pushed them to accept every client, lower prices (some people in the study agreed on rates as low as 10 €), and giving up previously set boundaries. In Norway, the number of “good” customers, i.e., affluent customers known as “stylish lunch customers” (Rasmussen et al., 2014), has been significantly reduced as well.

In the short term, the number of customers seems to be shrinking faster than the number of women in prostitution. Norway and Sweden studies show that in the long run, the number of women, particularly local women, is declining as well. However, alongside the smaller numbers of local women in prostitution, there are a high proportion of immigrant women from countries identified as sources of trafficking.

## Summary

The studies, which have been conducted over the 20 years since the Sex Purchase Act was first enacted in Sweden indicate some significant achievements of the approach. First, there is consensus on the decline in men's demand for prostitution. The data has been consistent on this in Nordic Model supporters' studies (Stø & Håland, 2013), in neutral studies (Rasmussen et al., 2014), and in studies in which the authors show a staunch opposition to the law (Ellison et al., 2019; Le Bail & Giametta, 2018). Second, the studies conducted in the "oldest" countries, Sweden, and Norway, also indicate a steady decline in the prostitution circle (Ekberg, 2018; Rasmussen et al., 2014). What is expected in the long run? Shrinking demand is likely to result in a corresponding reduction in the supply even in the newer Nordic Model countries. Less demand will lead to a decrease in solicitation, the viability of the sex trade, and finally in its volume.

There is an indication that the sex purchase ban might be more effective in dealing with third parties than laws directly focused on pimping (Rasmussen et al., 2014). When the demand is targeted, the sex trade becomes less profitable, and economic considerations discourage the pimps more than a fear of the law.

During the last decade, the online sex trade has flourished despite the ban. This won't surprise anyone, as the Internet has become the leading platform where individuals manage social, economic, and even criminal activity. Many physical laws throughout the world have been challenged in the Internet age. Nowadays, states are slowly catching up by adjusting their legislation. For example, in the US, the FOSTA SESTA law was recently enacted, and in Israel, the "Blocking Bill" was adopted. Rasmussen et al. (2014) address the interplay of three acts: prohibition on trafficking, prohibition on pimping, and the sex purchase ban. To me, specific laws banning online pimping activities are essential to ensure the effectiveness of legislation targeted at eliminating the sex industry. Such bills should become the fourth rib in the matrix of interacting laws.

Another argument against banning the purchase of sex is that it has made the sex trade more violent than it used to be. There are several types of findings to back up this claim. The first is data about violence and a sense of constant risk in the sex trade. However, most of the studies do not present comparative data, but rather a depiction of the sex trade at a particular point in time (e.g. Amnesty International, 2016). One can legitimately conclude that the sex trade is violent, but not that the Nordic Model is the cause.

The second category includes evidence for increasing violence after the sex purchase ban (Ellison et al., 2016). However, this data was not supplied by a trusted institutional entity, is extremely limited when we focus on severe violence, and is measured as "reporting

violence.” These limitations make it impossible to know whether the law caused an increase in actual violence or an increase in the reporting of such violence.

The third category is preliminary data on the frequency of violence. The ‘Dangerous Liaisons’ study compared a sample of more than 1,200 women with a sample of 123 women, which found that some types of violence diminished, and others increased (Bjørndahl, 2012). Although this study is often cited as proof of the harms of the Nordic Model, the researcher herself noted that her findings do not substantiate such a claim.

The fourth type is logical reasoning:

1. Due to reduced demand, the prostitution population is forced to accept the worst customers.
2. Fear of the police makes it difficult for women to make a risk assessment and they have to close a deal very fast.
3. Fear of enforcement pushes women to dangerous arenas like private flats.

These are pretty compelling arguments, but they raise a new question: is the law the problem here? After all, even before the law, the sex industry was very violent (Bjørndahl, 2012). Are another five minutes of “risk assessment” by a particularly vulnerable woman relying on a gut feeling a reasonable solution to the evidence of violence?

There is another question that should be asked: why is the sex trade so dangerous? Millions of freelancers, including women, meet clients in their own home or visit clients in their homes: private teachers, graphic artists, cleaners, alternative therapists. Client agency has never come up as an issue related to these pursuits.

Has the “criminalization climate” made prostitution customers more violent? For more than ten years, I made a living from writing academic papers for students. I’m not proud of that, but I have to make a point. My service was legal (everyone is allowed to write and sell their work), yet the customers performed an illegal act (they were not permitted to submit someone else’s work). I met my clients in my home, sometimes visited them, but never experienced a dangerous or threatening situation. I never heard of other people in the same business experiencing such a problem. The “criminalization climate” somehow had no effect.

Maybe it’s time just to say it: people who pay for sex are violent, and the “climate” which enables this violence is buying sex. On the street (Bjørndahl, 2012), in a brothel (Ellison et al., 2019), online (Le Bail & Giametta, 2018), offline (Cunningham et al., 2019), in their own apartments (everybody) – sex buyers are violent. Can we ignore this, to argue that the problem of violence is solved when vulnerable and disadvantaged women are given enough

time for “risk assessment”? To me, only a reduction in the number of women in the prostitution circle can guarantee the reduction of exposure to violence. The sex purchase ban brings about such a reduction in the number of women involved, at least partly, in the medium term.

Another problem that should be re-evaluated under the Nordic Model is the situation of undocumented migrants. The opponents of the law, like Vuolajarvi (2019) and Levy & Jakobsson (2014), suggest that authorities are quick to deport these migrants instead of investing in enforcing the purchase ban. I have not been able to find accurate data to evaluate the phenomenon, but if it exists – I agree that the policy has to be changed. Here, one might have expected the collaboration between the Nordic Model’s opponents and its supporters. Unfortunately, we disagree again. Proponents of the Nordic Model promote support and assistance policies for trafficking victims, while opponents argue that we are too easy to grant the “migrant sex workers” “trafficking victim” status. They believe that the latter are pretending to be trafficking victims to be included in rehabilitation and assistance programmes (Kingston & Thomas, 2018).

Inequality in the world is widening, and human trafficking is fuelled by poverty, wars, and limited access to information. We must learn to enforce the sex purchase ban while ensuring humane treatment of sex trafficking victims from poorer countries. I disagree with the opponents of the Nordic Model, that these are “migrant sex workers” seeking to improve their quality of life and we should just let the world prostitute them. What’s more, prostitution money is not the basis for economic and social mobility. At best, the money is sent to the relatives of trafficked women, and at worst, it is the human traffickers who enrich themselves.

We must refuse to prostitute destitute women from poor countries, and we must refuse to shun them. When we find a competent and consistent solution to the sex trade problem – we will know that we have finally won.

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