

Sylvia Burrow and Chris Bailey

Sexual Autonomy and Violence Against Women

The debate over the legalization of prostitution usually turns on whether one views prostitution as a liberating form of sex work (Bullough and Bullough 1996; Ericsson 1980; Kinnell 2001; Nussbaum 1999) or a result of women's oppressive social conditions that can never be chosen completely autonomously (Jeffreys 2009; MacKinnon 2005; Dworkin 1997; Stark and Whisnant 2004; Satz 1995; Shrage 1989; Overall 1992; Kinnell 2001; Bullough and Bullough 1996). The debate over the legalization of prostitution implicitly appeals to an argument about women's autonomy as follows. If women can autonomously choose to be sex workers and express that autonomy through sex work, then the law should protect that choice through upholding rights and freedoms for these workers as any other. If women cannot autonomously choose to be sex workers because it is an option forced upon women through coercive and manipulative or oppressive circumstances, then sex work should not be legally protected and, instead, laws should crack down on those complicit in prostitutes' oppression through criminalizing clients and managers. The legal debate concerning women's capacity to choose to engage in sex work is vital to address. But an equally vital part of this debate is currently overlooked. Our aim is to show that debates concerning legalization of prostitution should not proceed without addressing the key point that sex workers' autonomy is compromised because sex work routinely subjects women to violence.

We aim to show that violence against women (VAW) undermines sex workers' autonomy because it is a social threat limiting choice formation and pursuit. A feminist analysis of VAW reveals that different forms of prostitution expose women to different threats and so it is not so clear that threat of VAW has the same impact on all prostitutes. Prostitution is not a uniform institution since indoor sex work (such as brothels, display windows, peep shows, escort services, massage parlours and strip clubs) differs greatly from street prostitution. To draw out the distinction between the two types of sex work and their impact on women's autonomy we will

discuss each kind of prostitution to reveal its social and historical context. Our position is that the threat and experience of VAW that sex workers face is a crucial issue to address and should be considered in debates concerning the legalization of prostitution because in countries where prostitution is legalized, prostitutes continue to experience VAW. Our focus is to show that violence is crucially important to address because both the experience and the fear of physical, sexual or psychological harm erode women's capacity to choose and act autonomously. We shall argue, then, that despite differences between inside and outside prostitution, *all* women in prostitution suffer unacceptable levels of violence; hence, we conclude that all forms of prostitution continue to be morally problematic.

Violence Against Women

The United Nations' (2010) most recent report on violence shows that VAW is common worldwide. Both the experience and the fear of VAW are forms of violence that harm women. Understanding the common forms of VAW, their effects and the fear of VAW women typically experience can help us understand both the kinds of abuse sex workers have likely experienced in their past and appreciate how continual threat or experience of violence affects protective measures against further violence. VAW includes physical violence (hitting, punching, slapping, grabbing); sexual violence (including any form of unwanted sexual touching, sexual violence involving weapons and rape); psychological or emotional abuse (insults, put-downs, humiliation, manipulation and yelling); financial abuse (restricting access to resources, coercion, theft); spousal or intimate partner abuse (within current or former relationships or dating partners); harassment or stalking (persistent, malicious or unwanted surveillance or invasion of privacy); and homicide (Johnson 2006). Physical and sexual assault are most common. It is estimated that a fifth to a quarter of women will be sexually assaulted in their lifetimes. A worldwide study across ten countries by the World Health Organization (2010) shows that up to 71 per cent of women experience physical or sexual violence. Approximately 45 per cent of women in Europe are victims of physical or sexual violence, with 12-15 per cent suffering domestic violence after age 16 (Htun and Weldon 2010). A survey of over 16,000 people in the United States reveals that one in three women were raped in the year preceding the survey (Black et al. 2011).

A UN evaluation of the literature outlines social, economic and health costs associated with the experience of VAW (Day, McKenna and Bowlus 2005). Social costs of pain and suffering include reduced happiness, lower educational attainment, loss of housing, jobs, friends or family and behavioural and learning disabilities for those who witness violence. Economic costs directly incurred by VAW are out-of-pocket expenses such as transportation, childcare, alternative therapies, replacement of destroyed

belongings, relocation expenses and medication. Further economic costs are incurred through legal fees for assault, custody, separation or divorce cases, loss of time at work, lower work productivity or loss of employment altogether. Health costs include fees for immediate health care treatments such as physiotherapists, paramedics, psychologists, psychiatrists, alternative health care, dentists, prescriptions, procedures, treatments and supplies such as braces, crutches, slings and so forth. Long-term costs are harder to measure but arise from effects of poor health on lifestyle choices, reduced mobility in public social life, lifelong psychological trauma from rape and overall reduced longevity. While the UN report outlines costs in these areas separately, this should not imply that the impact of VAW can only be captured in one category. Effects of VAW are incurred across categories and the interconnected nature of these costs is borne not just by individual women but socially. The impact of VAW is felt across a multitude of government and non-government agencies, including emergency response teams, criminal investigations, legal aid, social services and health services (including crisis intervention workers, emergency room admissions, health support staff, social assistance, psychological counselling, children's aid services and therapeutic support groups).

Addressing VAW requires individual, social and political change since violence against women is predicated on pre-existing power imbalances between men and women entrenched in social and political institutions in which individuals participate. Htun and Weldon (2010) point to cross-cultural studies to assert that VAW is a manifestation of historically unequal power relations between men and women and that violence is a crucial social mechanism for men to force women into a subordinate position. The authors further note that economic inequality, cultural norms of male dominance, toughness and honour, male authority, and cultural patterns of conflict resolution through violence converge as best predictors of high levels of violence on both an individual and social level. Yet national campaigns do little to counter current practices since they focus on victim responses. That is, typical campaigns to address VAW outline behaviours and attitudes women can adopt in the hopes of avoiding violence while saying little or nothing about how to encourage men to take responsibility for dominant behaviours and attitudes implicated in future violent behaviour. We explore this idea below before turning to the case of sex workers. While all women engage in strategies to avoid violence, forms of violence and so threat of violence differs for sex workers. We will outline some of those differences while pointing out that, within sex work, different working environments incur different threats of violence.

Women typically engage in protective measures against VAW, engaging in avoidance and defensive behaviours because of fear of violence. Avoidance behaviours consist of strategies to avoid violence that women employ on a regular basis such as avoiding certain neighbourhoods or streets, avoiding going out at night or in the evening, avoiding going out

alone and otherwise restricting activities out of fear of harm. Defensive actions include carrying pepper spray or mace; holding keys in the hand when walking in parking lots; having a watch dog, burglar alarm or personal alarm; and taking self-defence classes.¹ Protective measures against VAW cultivate women's attentiveness to stranger violence and this focus is encouraged in government- or education-sponsored campaigns to stop violence against women. The message in these campaigns is that women are responsible for avoiding violence through adopting prevention strategies. This approach places responsibility for preventing VAW squarely on the shoulders of women, instead of advising various ways men can stop assaulting women. Feminist critiques of this approach point out that it simply perpetuates women's feelings of vulnerability while failing to acknowledge systems of power and control in society that favour men at the expense of women (see Stanko 1995; May, Rader and Goodrum 2010). Moreover, media coverage of VAW encourages a fear of strangers and detracts from the point that VAW largely consists of intimate partner and acquaintance assault. Most violence against women is perpetrated by men women know. Amnesty International (2006) points out that this form of VAW is the major source of death and disability for women aged 16-44. A recent World Health Organization (2010) study across ten countries shows that the first sexual experience for many women is forced by someone they know (24 per cent in rural Peru, 28 per cent in Tanzania, 30 per cent in rural Bangladesh and 40 per cent in South Africa) and that between 15 per cent (Japan) and 70 per cent (Ethiopia and Peru) of women have been assaulted by an intimate partner.

Sex workers routinely encounter violence, whether they work indoors or on the street. Most studies concerned with violence in prostitution focus on street workers. O'Doherty's (2011) study reveals that up to 98 per cent of women working on the streets of Vancouver, Canada experience violence from clients, pimps and other sex workers; similarly high levels of violence are reported in the United States, England, the Netherlands and Sweden. We do not have anything like such a comprehensive view of violence for indoor sex workers. It is a common, but entirely misguided, mistake to equate all prostitution with street prostitution. Thus it would be just as misguided to assume that indoor prostitution exposes women to the same degree or kind of violence as street prostitution does. And it is pressing to address this lack of research since the majority of sex work appears to occur off-street. More research is needed to discern reliable percentages of difference, but if O'Doherty's research is any indication, approximately 80 per cent of sex work takes place indoors. At the same time, it is vital to recognize that sex work often does not fall neatly into the category of either indoor or street since the work itself can be fluid, moving along a continuum from streets to cars to buildings operated by people providing space, security and management of earnings. While we recognize that prostitution may take place along a continuum, this need not prevent an

analysis of cases that clearly constitute street or indoor sex work. In either case, the occupational environment of sex workers appears to be violent.

For sex workers, violence is understood as “part of the job” and is considered normal, or so the following aims to show. Below, we explore how violence is implicated in sex work in order to flesh out the impact of violence on autonomy. Our view is that how sex work is currently structured socially and politically does little to counter threat of violence and that, until those structures change, VAW in sex work will continue to be a serious problem. The point is not that sex work is *inherently* problematic. Meredith Ralston argues, in this volume that buying or selling sex is not inherently harmful (2013: XX). We agree but endorse a more cautious optimism concerning commercialization of sex work. Ralston views economic and social power as a move toward equality in sex work. We consider empowering women central to emancipating sex workers. But we are more cautious because we realize that violence is perpetuated in sex work and that even the seemingly autonomous small business model of selling sex does not and cannot escape threat of violence until social and political responses to violence against women change. We recognize a need for political and legal resources to secure working conditions for prostitutes, protecting and upholding their rights through change in legal codes, employment contracts and occupational health and safety codes; and for those rights to be protected just as well as workers in other sectors of society. Without legal rights and protection of those rights readily available, there is little or no hope of violence in prostitution abating.

Violence Against Prostitutes

Common presumptions favour viewing indoor prostitution as safer than street prostitution because indoor sex workers are more in control of their clients and sexual encounters. Much of this paper aims to disrupt this view. We acknowledge that prostitutes do feel more empowered indoors but suggest this sense of security is associated with experiences of less frequent assaults and does not take into consideration the severity of assaults on indoor workers. To illustrate the difference in violence between the two types of sex work, we present Bailey’s (2008) cases of Melissa and Sandy, two sex workers she came to know quite well while she worked at a transition house in London, Ontario. Bailey’s experiences working with prostitutes reveal that sex work is often quite fluid, moving between indoor and street venues and sometimes for different parts of the transaction. To illustrate this movement we appeal to one of the few studies focusing on the fluidity of sex work, Karandikar and Próspero’s (2010) research on prostitution in Mumbai, India. Appreciating the fluidity of prostitution across venues is essential to understanding that sex workers are vulnerable

to different forms and severity of violence according to environment and so it may not be practical for sex workers to seek a less violent environment.

Street Sex Work

Street work is more frequently dangerous than indoor work (Church et al. 2001). But this point need not deter women from prostitution. Consider Melissa, a 24-year-old woman who works as a sex worker in the east end of London, Ontario. She reports the following to Bailey (2008). Her boyfriend is her manager Steve, whom she loves. He is 33 years old and drives a black late model 4x4 pickup with all the trimmings. He is pleasant looking, articulate and college educated. Melissa has been his girlfriend for seven years, since meeting at a party. Melissa reports a hard younger life—her mother is a sex worker and Melissa was repeatedly sexually assaulted by her mother’s boyfriend/manager. She ran away when she was 14 and ended up living on the street, where she began exchanging sex for drugs and places to stay. She claims to have no relationship with her mother but still keeps in touch with her grandmother who tries to persuade her to leave Steve and “straighten out her life.” Melissa doesn’t remember what grade of school she was able to complete—“maybe 6.” Melissa’s typical day begins late afternoon when she stands in a designated area on Dundas Street close to a little theatre with a parking lot behind. Cars slow down and she gets in. She does not know the majority of her clients and they drive in behind the theatre where she mainly performs oral sex. She reports that she prefers to receive \$50 for a blow job but will take less if business is slow. She will have intercourse with clients for \$100. She sometimes withholds some of the money from Steve because “he doesn’t give her that much.” Melissa reports that she sometimes doesn’t even have enough money to buy cigarettes and is not on the pill because she cannot afford it. She also reports that she was recently pregnant, had an abortion, and was out working four days later. When she bled on a client, he “freaked out” and hit her repeatedly with a stick he had in the car until she was able to get away. Melissa receives a steady supply of cocaine and marijuana from Steve and reports that as long as she has these she does not worry too much about food and daily living. She does not know if she has any STDs, has never been tested for AIDS, and does not want to know if she suffers from such health conditions.

Melissa’s case is familiar. Many women report turning to prostitution because an intimate partner encouraged a drug addiction and presented prostitution as an easy way to pay for the habit. Many are forced into street prostitution, as the following interviews illustrate:

I was introduced to it because I was drugged up. Then I was put out.

I was 13, I had a gun held to my head. I wasn't sure if it was loaded or not, but at the time I was pretty scared. And they told me that if I went to the cops or told my group home staff that they, when they got out, or they'll get someone to kill me. So I was pretty scared.

I fell into his game and he addicted me to crack cocaine and put me out on the street to pay for my habit later on.

I got put out when I was 15. We were drinking, and the next morning she said, "Well, if she's going to stay here, she's going to have to work." (Nixon et al. 2002: 1025)

O'Doherty's (2011) Canadian study shows that 98 per cent of street workers experience violence and that this degree of violence for street workers is similar to the United States, England, the Netherlands and Sweden. Nixon et al. (2002) cite studies showing that 82 per cent of street workers are physically assaulted, 83 per cent threatened with a weapon and 68 per cent raped, noting a small study of 24 participants in which 100 per cent experienced frequent and significant forms of violence; and that in Canada from 1992 to 1998 a total of 86 sex workers were murdered. The authors show that violence is perpetrated against girls before becoming prostitutes and that violence is targeted against them by intimate partners or boyfriends, pimps, clients and other prostituted women. In their study, 90 per cent of street prostitutes reported childhood abuse by fathers, step-fathers, boyfriends and other male adults.

Once involved in street prostitution, women are ever-aware of the potential for violence. The following illustrates the contingent nature of the work and the circumstances under which violence can suddenly occur:

Barbara: Anyway, I says, "Are you looking for business?" He says, "Yes, get in." And I took him down to this car park, and I got money off him, started doing business but ... then he started getting me mad and things, asking daft questions.... Like saying, "Do you like it?"... And I was trying to keep my calm and like get inside and go. Anyway, I started doing the business with him, and he started being proper aggressive while I was doing business.... Anyway, I said, "Your time's up." And he just fucking grabs me and starts going all mad, started going off his head.

Interviewer: Was he hitting you?

Barbara: Yes, he were on top of me on t'seat. I were laid back, and I slided up and I got the back door open and turn on to my side, you know struggling, and he put his hand over my mouth. I tried

to wriggle up to t'back, because the front seat were laid down passenger seat. I tried to wriggle up and out t'back door, and he's ... half of me is hanging out back door and he was on top of me, and covering me mouth, fucking suffocating. I went dizzy and I came round, and I fought him like ... but he had his hand over me mouth. I came round, still fucking choking me, I just bit his hand, and then he let go for a split second and I wriggled free. And I flew over car park and he chased me. Then he went back and got in his car. (Hart and Barnard 2003: 35; ellipses in original)

Nixon and Tutty report that 82 per cent of research participants had experienced “bad dates” or violence from a customer. Several women reported that they constantly feared bad dates and feared returning alive, commenting that, “You never know who you are going to jump in with [in a car] or if you were going to come home. You didn't know if you're going to get beat up or if you're going to make any money” (2003: 75). Street workers describe numerous forms and degrees of violence, as the authors summarize:

The assaults included being stabbed or cut, raped, gang-raped, raped at gun point, forced to engage in degrading sexual acts, choked/strangled, beaten, kidnapped, stalked, gun held to head, tied up, tortured, beaten with objects such as baseball bats or crowbars, and run over. These incidents often resulted in hospitalization and serious injuries such as miscarriages, stitches, paralysis, broken bones, and fractures. One woman described how, “The guy who I had a bad date with is in jail for fifteen years. He cut me from asshole to belly button. I had stitches from here to there and everywhere.” Another narrated, “I ended up in the hospital one time for three days. He [customer] took a crowbar and whipped me all over the head and my legs. I couldn't even open my eyes... [he] broke my nose.” (75)

The World Health Organization's (2005) report on violence against sex workers links the constant threat or experience of violence to anxiety, depression, loss of self-esteem and lower priority to health and HIV prevention because of more immediate concerns for safety and survival. Safety and survival are paramount in the street worker's mind, at least until internalized self-hatred and low self-esteem diminish care about their own well-being. These street workers remarked:

The dangers of living out on the street never got to me. I was never afraid because I don't I think cared if something ever happened to me. I really did not care.

After a while of being abused, you stop caring and you stop caring about your body. Sometimes you don't care if you're safe or not. (Nixon and Tutty 2003: 76)

Indoor Prostitution

Sandy is a 42-year-old woman from London, Ontario. She reports the following to Bailey (2008). She is a sex worker for a biker gang in the house where she lives, in the east side of London where there are at least two security men working at all times. The house is subdivided into smaller rooms as well as a large bathroom area where the women can shower, apply makeup and keep their various articles of both “work clothing” and clothes worn when not working. Her clients vary from other gang members to more conventional businessmen. Sandy reports great camaraderie between the women (for the most part) and a good relationship with the men who work there. She gives a portion of her earnings to the gang and reports that she is paid very well and that she likes the “safe and clean” working conditions. Sandy does not appear to mind that she has abandoned her daughter to do sex work for the biker gang. Her daughter is 14 and has lived with Sandy's mother for the past seven years. Sandy was raised by two parents whom she describes as churchgoers. She went to community college at 19 and has a degree in hotel management. She also has a certificate in aesthetics. She worked for a hotel chain before becoming a sex worker five years ago. Sandy met and was married to her daughter's father for six years. She describes the marriage as uneventful and that he was her first partner. The marriage disintegrated when he left her and her daughter, then 6 years old. Sandy began having difficulty financially supporting herself. She met another man shortly after who was an active recreational drug user (cocaine). Sandy tried cocaine and alcohol for the first time in her life and reported loving the freedom that it allowed her. Her use increased to the point that her parents became alarmed and successfully sought custody of her daughter. Sandy met some members of the gang through her partner and became one of their workers shortly after. She is willing to continue working there for as long as she is attractive enough to keep clients. Sandy realizes that she has a number of opportunities to work in other fields but believes that the money would not be as good, so she chooses to remain in prostitution. She reports no regrets and likes most of her clients. She visits the doctor regularly and tests negative for AIDS and Hepatitis C.

Sandy appears to consider her indoor working conditions safe because she feels a sense of protection from her biker gang. But is she safe? A common supposition is that indoor prostitution is a safe and secure work choice. Ronald Weitzer admits that there is limited research on indoor prostitution, yet claims that

research finds that many indoor workers made conscious decisions to enter the trade; they do not see themselves as oppressed victims and do not feel that their work is degrading. Consequently, they express greater job satisfaction than their street-level counterpart. (2007: 29)

Claims such as these capture the perception that indoor work is an autonomous choice to work in the safety of an indoor environment. Yet at the time of this writing we have discovered no indication that indoor sex work is safe or even that indoor workers are exposed to a relatively low level of violence compared to street workers. Instead we see that indoor sex work poses a risk of less frequent but more serious violence than street work. Hart and Barnard's research gives us some indication of the kinds of violence indoor workers may experience. The authors' interview with a sauna worker in the U.K. illustrates a case of sudden extreme violence that will carry lasting psychological harm:

Interviewer: Have you done [sold sex to] him more than once?

Alison: I have done him about four times, like this were t' fifth time maybe and it were just, we had done the business and he had a shower afterwards. I got sorted out, got dressed, saying nice to see you again, blah blah blah, the next thing he just fucking attacked me.

Interviewer: How did he do that?

Alison: All of a sudden he says "it would be good to see you again" all of a sudden it were just like he ... just like total change—he punched me, just straight in my mouth.

Interviewer: There was no warning?

Alison: There was no warning at all, he just did it, he just did it... I was that shocked because I was on the floor then, like my God what's going on ... by this time he was kicking hell out of me. He started kicking my body. I was on the floor, he was kicking me in the head, in my face. I mean the time he finished with me there was lumps all over me head. The whole attack must have lasted I would say 30-40 seconds. (Hart and Barnard 2003: 35)

In The Hague, sex workers who worked in a building without the usual alarms, cameras or security guards common to Dutch indoor sex work were interviewed. One worker there, Valencia, reported a sense of security

since she felt in control to turn down customers. In her interview she reported that she had never turned down a customer but at the same time she recognized recent severe violence:

“Just last week someone’s cut up in here.” She motioned to her breasts. “They find her legs thrown under the bed.” Her words aptly describe what Brewis and Linstead found in their own research, on which they remarked how “it is emphasized by advocates of the sex workers’ perspective that all prostitutes seek ... freedom within their labour process, even those who seem to work in the most dangerous and unpredictable situations.” (Petro 2010: 165)

Threat of death is the most serious threat indoor sex workers face, but sexual assault and rape are very close in seriousness. Indoor workers are more vulnerable than street workers to such serious forms of violence. Raphael and Shapiro’s (2004) study found 50 per cent of women in escort services were raped; 51 per cent of exotic dancers were threatened with a weapon and one third of women exchanging sex for money in their own residence experienced at least one form of sexual violence such as threatened rape, fingers or objects inserted vaginally or forced sex. In the case of indoor sex workers, customers are responsible for the majority of sexual violence. For instance, customers perpetrated 86 per cent of violence for exotic dancers who were threatened with sexual assault. Experiencing sexual assault and rape is associated with further harm, that of post-traumatic stress disorder (PTSD). PTSD results from traumatic events and occurs when people experience actual or threatened serious injury, threatened death, witnessing events of death, injury or threats to the physical well-being of another person and so forth; it is characterized by anxiety, depression, flashbacks, emotional numbing, insomnia, irritability and hyperaltness. Farley (2004) points out that PTSD is common among prostitutes. If it is correct that indoor workers face more serious incidents of violence, then we can imagine that these workers are more likely than street workers to be further harmed through experiencing PTSD.

Fluid Movement

The above two case histories indicate clear differences between indoor and street prostitution. But we also recognize that the line between street and indoor prostitution may not be so clear. Two routes of mobility create fluidity between indoor and street sex work. Either a street worker continues to use the street to attract clients but performs services indoors (in a rented apartment, hotel or client home); or an indoor worker is based in an apartment, hotel, brothel or sauna but occasionally returns to the street to solicit

clients when business is otherwise quiet. If sex work is fluid in these ways, then it exposes women to both the violence associated with indoor work and the violence associated with working the street. To understand how VAW affects sex workers it is essential to appreciate differences in forms of violence associated with indoor and street work. Raphael and Shapiro's (2004) table below provides an overall picture of the forms of violence (ranging in levels of severity) across prostitution venues:

Table 1: Percentage of Respondents Ever Experiencing Violence Across Prostitution Venues

TYPE OF VIOLENCE	ES-CORT (N = 28)	EXOTIC DANCING (N = 43)	OWN RESIDENCE (N = 24)	STREET (N = 101)	HOTELS (N = 21)	DRUG HOUSE (N = 45)	SURVIVAL SEX (N = 29)
Slapped	57.1	62.8	41.7	86.1	57.1	80.0	65.5
Punched	39.3	23.3	21.8	70.3	33.3	57.8	48.3
Hair Pulled	46.4	44.2	33.3	66.3	33.3	40.0	44.8
Pinched	32.1	34.9	21.8	17.8	14.3	31.1	17.2
Spanked	39.3	27.9	25.0	24.8	33.3	25.4	24.1
Kicked	14.3	20.9	12.5	43.6	23.8	31.1	24.1
Ripped clothes	50.0	58.1	37.5	77.2	66.7	71.1	65.5
Something thrown	28.6	62.8	16.7	52.5	42.9	42.2	55.2
Threatened with weapon	39.3	51.2	16.7	79.2	47.6	64.4	51.7
Threatened rape	39.3	48.8	37.5	55.4	33.3	64.4	41.4
Fingers/objects	35.7	25.6	33.3	39.6	23.8	51.1	41.4
Forced sex	50.0	23.3	37.5	64.4	23.8	66.7	48.3

Source: Raphael and Shapiro (2004: 133)

The authors' research shows that street workers more often experience physical assault such as slapping and punching while indoor workers more often experience severe violence such as rape or threats with a weapon. Violence is perpetrated by pimps, partners, clients and police officers, but violence is rarely reported out of fear of police assault or arrest (Karandikar and Próspero 2010). Whatever its legal status, prostitution incurs large costs of physical, sexual and psychological harm to women—violence is part of the profession.

But women across race, class and ethnicity may not experience the same severity or frequency of violence. Farley's (2004) research shows that increased violence is associated with lower income and that indigenous women are most vulnerable. She remarks that it is class prejudice to assume that street prostitution poses worse threats of violence than "high-class escort prostitution." For instance, indoor work may pose greater risk of serious harms such as exploitation and enslavement (Farley 2004: 1101). An illuminating case of how income, class and ethnicity intersect to expose sex workers to the most serious forms of violence is revealed in Karandikar and Próspero's interviews with sex workers in Mumbai, India. There, prostitutes live in fear of police arrest and those working either in brothels or the street lack basic needs such as food, clothing, shelter and hygiene. The authors point out that all the sex workers they interviewed reported that they were locked inside brothels when they initially entered sex work and had gradually moved out of the original brothels after paying their dues. Four out of ten sex workers joined other brothels, whereas the other six moved to the street. Nine out of ten sex workers report having a current intimate partner. That intimate partner moved from being one of their clients to one of their regular clients and ultimately to a live-in relationship or marriage. The latter is usually accompanied with both the promise to leave the street for a safer location and a considerable amount of care and affection. Lata elaborates on this process:

He promised that he would rescue me from the red-light area. He offered to marry me and even helped me escape from the brothel. I married him with the hope that I would be leaving sex work forever. However, that was not his real intention. (Karandikar and Próspero 2010: 264)

Lata's situation appears to be a common phenomenon in India. Regular clients offer escape from sex work but simply move women from street work to indoor work through a manipulative process. These intimate partners isolate sex workers from friends and family, track their movements and do not let them negotiate their own sex work. Gradually, those sex workers lose their sense of independence and self-confidence as their

intimate partners become their pimps through control and manipulation. Yet the move indoors is not necessarily permanent, as Soni explains:

He married me and took me to his house. After a year of staying with his family, I started falling sick. I was detected HIV positive. His family refused to care for me. We had no other choice. He was unemployed and he asked me to return to Kamathipura for sex work. (Karandikar and Próspero 2010: 265)

The above cases illustrate the fluidity between street and indoor sex work. While both Sani and Lata began in brothels and moved to the street, Lata eventually became an indoor sex worker while Sani moved to indoor work and then returned to street work. This fluidity of movement is important to understand in order to appreciate that sex workers may not be able to avoid the violent conditions of either street work or indoor work. Prostitution crossing boundaries of indoor and street work exposes workers to the violence of each.

It is unlikely that Lata or Sani would consider their indoor conditions safe since they are not protected from the violence trailing in from the street. Sex workers moving between the street and indoors are not necessarily protected from violence when working indoors. Karandikar and Próspero's research shows that a common theme of sex workers whose regular clients become intimate partners is that partners demand the money earned through sex work and threaten sex workers with physical violence to ensure compliance. This coercion places workers in a financially and psychologically dependent position. Financial dependence coerces women into remaining in the situation, but doing so is psychologically damaging because receiving continual threats is psychologically abusive. The sex worker in this case is controlled by her intimate partner and so she loses her sense of freedom to walk away. It is not uncommon for her partner to sexually assault and rape her once he has coerced her into financial and psychological dependence. The authors reveal that just a couple of days before interviewing Lata she endured this experience:

He was so angry because I did not give him money that he pushed me to the ground and kicked me on my stomach and back. He got a cycle chain and beat me with it. I started bleeding profusely and had to be rushed to the hospital. (2010: 268)

Working on the street does not protect sex workers from the coercive conditions imposed by their pimp boyfriends or husbands. The authors' interview with Rani shows a serious and most desperate response to enduring financial, sexual, physical and psychological abuse:

He is obsessive about sex. He beats me if I refuse to have sex with him. He hurts me during intercourse and insists on not using condoms. We both live on the road and it's extremely difficult for me to have sex with him. I retaliate by carrying this blade with me everywhere. I hide it in my bra and whenever I am attacked by him I threaten to kill myself. I stand in front of the police station and threaten him that if he tries to harass me I would commit suicide in front of the police station and will not be scared to blame him. (267)

Fluid movement between indoor and street work is common in prostitution because, like the case of prostitutes in India, prostitutes are often controlled by intimate partners who dictate sex work regardless of whether it occurs indoors or on the street. A World Health Organization (2005) report on violence in sex work points out that sex workers are surrounded by a web of “gatekeepers” (managers, clients, owners of establishments, intimate partners, law enforcement authorities) who exert control by dictating the amount or kind of work, amounts charged and whether or not condom use is possible. Prostitutes have little access to information or resources to secure their own protection, especially where prostitution is criminalized. Even when prostitutes report violence, their claims concerning harassment, assault, rape, kidnapping and murder have been dismissed (Rekart 2005). With this control over workers' lives usually comes threat of violence, physical isolation, forced drug or alcohol use, manipulation and other forms of violence aiming to keep workers under control (Cler-Cunningham and Christerson 2001).

Threats to hand workers over to the police do not amount to just threats of criminal charges. In many countries or jurisdictions police will use the law to harass and sexually assault prostitutes, routinely arresting and then forcing sexual services for release. Prostitutes' acceptance of the inevitability of violence differs between street and indoor sex workers because each experiences threat of VAW in very different ways. Our claim is that threat of violence impairs autonomy since it closes legitimate opportunities to choose otherwise: sex workers' autonomy is impaired by violence and the threat of violence. We saw above that harms street workers are exposed to are generally more frequent but less serious than those to which indoor workers are exposed. When those street workers are implicated in relationships with their pimps, they are also exposed to serious harms of rape and sexual assault by their partners. In cases in which sex workers move between the street and indoor work, they are exposed to both the risks of street work and the risks of indoor work. Hence, workers moving between the street and indoors are most likely to experience the most frequent and the most serious of assaults.

Coping, Coercion and Autonomy

In the debate concerning the legalization and morality of prostitution, some argue that sex work expresses freedom of choice to control one's body as one wishes and, thus, in a society that respects the basic rights of women, the choice to engage in sex work ought to be respected as a free and autonomous choice (Shrage 1996; Nussbaum 1999; Ericsson 1980). Those opposing the legalization of prostitution argue that selling sexual services, unlike selling other products, necessarily implicates the self in an intimate and unique way to the degree that one effectively sells *herself* in selling sex. Thus the commodification of sexuality is self-alienating, threatening to a crucial avenue of self-expression, and hence undermines autonomy (Gauthier 2011). While we do not aim to address the morality or legality of prostitution in this essay, we aim to draw out the implicit claim about autonomy behind proponents of views such as the above. That is, such arguments concerning prostitution rely on the claim that, at the most basic level of analysis, the choice to engage in prostitution is free and autonomous; but for the special relation to one's body in selling sex (which is inescapable), prostitution could be an autonomous choice.

We challenge this perspective. While the choice to engage or not engage in sex work may be *capable* of expressing autonomy, we argue that the choice to engage or remain in sex work is currently undermined by systems of violence. Given current social, political and legal arrangements that perpetuate violence against prostitutes, the threat of violence is a pervasive, real threat. In any environment in which the threat of violence is ever-present and enduring, one's capacity to choose autonomously is diminished because choice is limited. Thus, our argument does not concern the inherent immorality or freedom to choose to engage in sex work. Rather, our argument is driven by current practices of violence that threaten the possibility to choose autonomously to engage or remain in sex work. To show this we first point out risk reduction strategies that sex workers typically employ to show how sex workers currently aim to cope with threat of violence. These coping strategies are instructive in recognizing how threat of violence undermines possibility for choice.

Sex workers recognize the risk of violence in selling sex. Risk reduction strategies are ever-present in sex work in which women aim to balance harm reduction strategies with their desire to make money. Teela Sanders (2004) points to different forms of risk management for street and indoor workers. Street workers manage risk of violence from clients, police and community protestors through strategically managing the environment at every stage of the transaction: negotiating price, choosing location of the sex work and doing the sex work. In Sanders' small study all of the workers directed their clients to a predetermined location that would maximize their safety, such as residential streets or areas with CCTV cameras; car-

ried weapons to fend off attacks or strategically placed weapons in bushes near to where they would direct their clients; generally avoided vans and cars with more than one man (carefully checking the back seat); worked in pairs and noted licence plates for each other; and often informed friends or boyfriends of where they were going. Employing such risk management tactics was borne of experience. Nicole reports:

When I went out there to begin with I just used to get into any car, with two or three men and never used to check or anything. I got into quite a lot of trouble doing that ... I was raped and kidnapped and had to spend time in hospital. (Sanders 2004: 1710)

Indoor prostitutes negotiate space in different ways as part of employing protective strategies. These sex workers typically choose residential apartments or hotel rooms for security while avoiding client houses or apartments. Hart and Barnard's (2003) research shows that indoor workers engage in three main protective strategies: confidence in relating to clients, acting the part and control of sexual position. Confidence is asserted in expecting clients to follow the rules according to the worker's outlined processes of the interaction. This confidence may be genuine or it may be acting the part of a self-controlled, well-organized and experienced sexual agent. Control of sexual position is the main focus of the prostitutes' management of risk. She ensures that sexual intercourse is completed quickly and with the least amount of compromising physical or emotional effort. These three risk-reduction strategies are not unique to indoor workers but are common to indoor work and they are often used together to maximize violence avoidance.

The above risk-reduction strategies illustrate constraints on choices sex workers face because of threat of violence. Threat of violence impairs possibility for autonomy. We saw above that most women have a well-developed sense of their vulnerability to sexual assault and rape, revealed in choices to avoid certain places or refraining from walking alone at night, holding car keys in hand to return to the car, never going out alone, carrying mace or pepper spray, having alarm systems, owning a gun and so forth. Women are socialized in such safety strategies, which are encouraged by parents, teachers and both government and police campaigns addressing violence against women. These prevention strategies effectively restrict choice formation and pursuit. Women's choices in where to go, when to go, whom to go with and in general how to move about in the world are limited by the threat of violence. Burrow (2012) points out that this threat of violence implicates further restrictions in carrying out choices or upholding wants, wishes and desires. A woman might have chosen to go to a friend's house or take a walk in a park but the threat of violence resists against that choice; or, worse, a woman might cave on her commitments to certain values or

beliefs because of such limitations on actions and behaviours. Limitations on choice formation and pursuit undermine women's possibility for autonomy in two ways. Autonomy is directly undermined through limiting choices one is capable of having and following through on. Autonomy is indirectly undermined by living in a culture of violence against women. A culture of violence against women creates a society that subordinates women. Patterns of degradation and humiliation are entrenched in practices threatening violence against women. The threat of violence is itself an act of violence and it, like the experience of violence, is both degrading and humiliating. Living in a society that routinely permits violence against women undermines forms of self-appreciation such as self-trust, self-respect, self-worth and self-esteem. Burrow (2010) argues elsewhere that these forms of self-appreciation are essential to autonomy and, thus, shows that living in a culture of violence undermines autonomy. Since sex workers cannot escape living in a culture of violence, their autonomy is necessarily undermined, including their autonomy concerning the choice to leave or remain in prostitution.

Conclusion

Violence against women is vitally important to address because it undermines autonomy to make and carry out choices. In the context of sex work we suggest that choices concerning which clients to take, when and where to engage in sex work and decisions about remaining in sex work are key choices undermined by threat of violence or the experience of violence. We do not suppose that all sex workers directly experience violence, recognizing that women's precautionary measures to avoid violence may often be effective and that some workers may be aware and intelligent enough to conduct sex work only under the safest conditions. Not all sex workers operate under the influence of drugs and hence experience impaired decision-making capacities. Nevertheless, sex work exposes women to threat of violence. Since violence is endemic to sex work, the threat of violence is unavoidable. Sex workers are well aware of the routine and often serious forms of violence experienced both indoors and on the street and quickly learn to adopt avoidance and defensive measures. Yet the threat of violence appears to itself constitute a form of psychological violence. If this is correct, then violence in sex work is unavoidable. Moreover, those selling sex are well aware that it is harder to secure or appeal to protection offered to others in society. Whether legalized or criminalized, sex workers have fewer options to turn to police, social or legal protection if those capable of preventing violence toward prostitutes are caught in the grip of social stigma and distaste. Discrimination toward sex workers will accompany social norms and values diminishing and devaluing sex work,

and those who serve to protect the citizens of a country are not exempt. Hence, both those defending a liberal approach to sex work as freedom of expression and those upholding prostitution as sexual exploitation ought to direct their attention to VAW as a more pervasive and relentless form of oppression of women in their debates about legalization of prostitution.

Notes

1. While self-defense classes are typically considered on par with other such prevention strategies, Burrow (2012) outlines elsewhere an account of how self-defence training remarkably differs from other avoidance strategies since it cultivates qualities countering fear of violence.

References

- Amnesty International. 2006. Amnesty international report 2006: The state of the world's human rights. London, U.K. <http://www.amnesty.org/en/library/info/POL10/001/2006> (accessed April 1, 2011).
- Bailey, Chris. 2008. Transition house interviews with sex workers. London, ON.
- Black, M. C., K. C. Basile, M. J. Breiding, S. G. Smith, M. L. Walters, M. T. Merrick, J. Chen and M. R. Stevens. 2011. The National Intimate Partner and Sexual Violence Survey (NISVS): 2010 Summary Report. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. <http://www.cdc.gov/violenceprevention/nisvs/> (accessed June 1, 2011).
- Bullough, B. and V. Bullough. 1996. Female prostitution: Current research and changing interpretations. *Annual Review of Sex Research* 7:158-80.
- Burrow, Sylvia. 2010. Verbal Sparring and Apologetic Points: Politeness in Gendered Argumentation Contexts. *Informal Logic* 30 (3): 235-62.
- . 2012. Protecting one's commitments: Integrity and self-defense. *International Journal of Applied Philosophy* 26 (1): 49-66.
- Church, S., M. Henderson, M. Barnard and G. Hart. 2001. Violence by clients towards female prostitutes in different work settings: Questionnaire survey. *British Medical Journal* 322:524-25.
- Cler-Cunningham, L. and C. Christerson. 2001. Studying violence to stop it. *Research for Sex Work* 4:25-26.
- Day, Tannis, Katherine McKenna and Audra Bowlus. 2005. The Economic Costs of Violence Against Women: An Evaluation of the Literature. *United Nations*. <http://www.un.org/womenwatch/daw/vaw/expert%20brief%20costs.pdf> (accessed June 1, 2011).

Dworkin, Andrea. 1997. *Life and death: Unapologetic writings on the continuing war against women*. New York: The Free Press.

Ericsson, Lars. 1980. Charges Against Prostitution: An Attempt at a Philosophical Assessment. *Ethics* 90 (3): 355-66.

Farley, M. 2004. "Bad for the body, bad for the heart": Prostitution harms women even if legalized or decriminalized. *Violence Against Women* 10 (10): 1087-125.

Gauthier, Jeffrey. 2011. Prostitution, sexual autonomy, and sex discrimination. *Hypatia* 26 (1): 166-86.

Hart, Graham and Marina Barnard. 2003. "Jump on top, get the job done": strategies employed by female prostitutes to reduce the risk of client violence. In *The Meanings of Violence*, 32-49. Ed. Elizabeth A. Stanko. New York: Routledge.

Htun, Mala and Laurel Weldon. 2010. Violence against women: A comparative analysis of progress on women's rights. Paper presented at American Political Science Association meeting, Washington, DC.

Jeffreys, Sheila 2009. *The Industrial Vagina : The Political Economy of the Sex Trade*. London: Routledge.

Johnson, Holly. 2006. Measuring Violence Against Women: Statistical Trends. *Statistics Canada*. www.statcan.gc.ca/bsolc/english/bsolc?catno=85-570-X (accessed April 1, 2011).

Karandikar, S. and M. Próspero. 2010. From client to pimp: Male violence against female sex workers. *Journal of Interpersonal Violence* 25 (2): 257-73.

Kinnell, H. 2001. Murderous clients and indifferent justice: Violence against sex workers in the UK. *Research for Sex Work* 4:22-24.

Mackinnon, Catharine A. MacKinnon. 2005. *Women's Lives, Men's Laws*. Cambridge, MA: Belknap Press of Harvard University Press.

May, David C., Nicole E. Rader and Sarah Goodrum. 2010. A Gendered Assessment of the "Threat of Victimization": Examining Gender Differences in Fear of Crime, Perceived Risk, Avoidance, and Defensive Behaviors. *Criminal Justice Review* 35 (2): 159-82.

Nixon, K. and L. Tutty. 2003. "That was my prayer every night – just to get home safe": Violence in the lives of girls exploited through prostitution. In *Being heard: The experiences of young women in prostitution*, 69-85. Ed. K. Gorkoff and J. Runner. Halifax, NS: Fernwood Publishing.

Nixon, K., L. Tutty, P. Downe, K. Gorkoff and J. Ursel. 2002. The everyday occurrence: Violence in the lives of girls exploited through prostitution. *Violence Against Women* 8 (9): 1016-43.

Nussbaum, Martha. 1999. *Sex and Social Justice*. New York: Oxford University Press.

- O'Doherty, T. 2011. Victimization in off-street sex industry work. *Violence Against Women* 17 (7): 944-63.
- Overall, Christine. 1992. What's wrong with prostitution?: Evaluating sex work. *Signs* 17:705-24.
- Petro, Melissa. 2010. Selling Sex: Women's Participation in the Sex Industry. In *Sex Work Matters*, 155-69. Ed. Melissa Hope Ditmore, Antonia Levy and Alys Willman. London: Zed Books.
- Ralston, Margaret. 2013. Selling Sex: A Tale of Two Films. In *Talk About Sex: A Multidisciplinary Discussion*, XX. Ed. Robert Scott Stuart. Sydney, NS: Cape Breton University Press.
- Raphael, J. and D. Shapiro. 2004. Violence in indoor and outdoor prostitution venues. *Violence Against Women* 10 (2): 126-39.
- Rekart, M. 2005. Sex-work harm reduction. *Lancet* 366:2123-34.
- Sanders, Teela. 2004. The Risks of Street Prostitution: Punters, Police and Protesters. *Urban Studies* 41 (9): 1703-17.
- Satz, D. 1995. Markets in Women's Sexual Labor. *Ethics* 106:63-85.
- Shrage, Laurie. 1989. Should Feminists Oppose Prostitution? *Ethics* 99:347-61.
- . 1996. Prostitution and the Case for Decriminalization. *Dissent* (Spring): 41-45.
- Stanko, Elizabeth A. 1995. Women, Crime and Fear. *Annals of the American Academy of Political and Social Science* 539:46-58.
- Stark, C. and R. Whisnant, eds. 2004. *Not For Sale: Feminists Resisting Prostitution and Pornography*. North Melbourne: Spinifex Press.
- United Nations. 2010. The World's Women 2010: Trends and Statistics. <http://unstats.un.org/unsd/demographic/products/Worldswomen/WW-2010pub.htm> (accessed May 1, 2011).
- Weitzer, Ronald. 2007. Prostitution: Facts and fictions. *Contexts* 6 (4): 28-33.
- World Health Organization. 2005. Violence against sex workers and HIV prevention. *Violence Against Women and HIV/AIDS: Critical Intersections*. Information Bulletin Series, Number 3. <http://www.who.int/gender/documents/sexworkers.pdf> (accessed November 1, 2010).
- World Health Organization. 2010. Preventing intimate partner and sexual violence against women: taking action and generating evidence. Geneva: World Health Organization. http://apps.who.int/iris/bitstream/10665/44350/1/9789241564007_eng.pdf (accessed April 1, 2011).