

**International Comparative Explorations of Prostitution Policies:
Lessons from Two European Projects**

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Abstract

In this contribution we reflect on our experiences of co-designing and coordinating two comparative projects on prostitution policies in Europe by focusing in particular on the epistemological workings underpinning their design and execution. We set out two main goals. The first is to shed light on what the epistemological and methodological issues we encountered reveal about the field of prostitution policy studies, an endeavour which can contribute to better comparative research in the field. The second goal is to relate the scope, developments, outcomes and expectations of the two projects to recent attempts to identify a ‘one-size-fits-all’ model of prostitution regulation, and to interrogate whether transplanting it across Europe is a desirable outcome. Building on the lessons learned from the projects, we propose an approach to prostitution policy development that is reflective of the specific contexts within which the policies are meant to be applied.

Keywords: Cross-national comparative research; epistemological labour; European harmonization; legal cultures; prostitution regulation.

Introduction

The epistemological and emotional labours intrinsic in international comparative social research projects are well known to those who have been involved. Their formal discussion, however, remains limited (Livingstone 2003) and the ‘enormous difficulties that can be faced in trying to understand other ways of life’ (Nelken 2010: 5) tend to be neglected. In this contribution we open what Rigby and Edler (2005) refer to as the ‘black box’ of collaborations by reflecting on our experiences of co-designing and coordinating two comparative projects on prostitution policies in Europe.¹ Here we focus less on the emotional labour invested in them, and explore in more depth the epistemological workings underpinning their design and execution. Both projects emerged out of the need to move beyond single-country analyses to look at recent developments in prostitution markets and prostitution policies in the broader European context and beyond, and to observe contingent, local as well as inter-connected and global patterns in these developments. The projects also responded to an increased interest in the governance of prostitution across European nations and institutions. Prostitution is one of the most contentious policy areas in Europe today, and both at the national and European level, there is a demand for effective models of regulation, for legal harmonization and sharing best practices of governance across jurisdictions. In this paper, we reflect on these contexts and on the execution of the projects and we ask: what epistemological and ontological assumptions did we make in giving shape to these projects? What methodological challenges have they entailed, and how were these addressed? What were we expecting from these projects, and what was expected of them by our funders and

¹ We have been among the original ideators and then the coordinators of these projects. However, both are the result of collaborations with many colleagues and we do not claim ownership over them. This contribution emerges from the fruitful epistemic encounters that these projects facilitated but it is not meant to represent the views of all those who participated in the projects. It is based on our own reflections of these projects, reflections which, we argue, offer rich empirical insights into the status and opportunities offered by prostitution policy studies in Europe.

stakeholders in the field? What lessons have we learned about doing comparative work on prostitution policies in Europe? In addressing these questions we set out two main goals. The first is to shed light on what the epistemological and methodological issues we encountered reveal about the field of prostitution policy studies, an endeavour which is intended to inform and enhance future collaborative and comparative work in the field. The second goal is to relate the scope, developments, outcomes and expectations of the comparative work carried out in the two projects to recent attempts to identify and transplant ‘best practices’ of prostitution regulation across Europe. To this end, we interrogate whether the European harmonizing of prostitution policies around a ‘one-size-fit-all best model’ is a desirable outcome. We maintain that the complexity of prostitution and its regulation which the projects point to suggest moving beyond the search for the ‘best model’ of prostitution regulation, despite expectations that this should be an outcome of the projects. Rather than having a homogenous and uniform ‘European’ regulatory model, building on the lessons learned from the projects, we propose a more epistemologically and culturally sensitive approach to improve the quality of policy making in the field.

Our analysis is informed by the rich body of scholarship relating to the theories and methods of cross-national comparisons in the social sciences. The works of Hantrais (1999; 2005a; 2005b; 2009) and Nelken (1995; 2009; 2010) have been particularly useful in reflecting upon our comparative journeys as we embarked upon them, and retrospectively in the writing of this contribution. Drawing on their studies on family policy and criminal justice systems respectively, Hantrais and Nelken have written extensively on the merits, limitations and challenges of cross-national comparative research and on how systematic reflections on these very aspects can act ‘as a spur for theoretical and methodological developments in the social sciences’ (Hantrais 2005a: 402). They share an interest in moving beyond ‘the extremes of universalism and culturalism’ (Hantrais 1999: 97), or, as Nelken

puts it, the dangers of being either relativist, i.e. the belief ‘that we can never really grasp what others are doing’, or ethnocentric, i.e. ‘confusing the familiar with the necessary’ (2010: 19). They advance that in order to depart from these conflicting approaches, and with a view to enhancing the potential of international collaborations, careful attention needs to be paid to the context-boundedness of the concepts adopted and practices examined. Thinking critically about the relevance of context also entails being aware that ‘the research process is itself context bound’ (Hantrais 2009: 94), an epistemological operation that adds an extra layer of complexity to the pursuit of international collaborations. In this same respect, Nelken emphasizes that to avoid ““comparisons by juxtaposition”, whereby it is assumed, rather than demonstrated, that local experts’ accounts of different places are speaking to the same issues’ (Nelken 2010: 6), researchers must consistently reflect on how their own cultural assumptions inform project formulations, data collection and its interpretation and explanation.

While the contributions of these scholars have more breadth and depth than the brief points outlined here, we emphasize their valuing of context-sensitivity and of reflexivity in comparative research as critical in informing the epistemological labour we invested in the international collaborations forming the basis of our analysis. Of course, all studies – whether comparative or not – should reflect on the contextual factors that influence their research approaches, aims, and the understandings of the very objects of their analysis. The projects we present here, however, were quite unique in bringing together for the first time a large number of international experts in commercial sex and its regulation. They represented an unprecedented platform for people to meet in person and think comparatively, contextually and reflexively, and in so doing, identify and discuss assumptions, norms and conventions that had remained unchallenged and unexplored in the field.

Before we look at some of the challenges and contestations that emerged from the projects, in what follows we present an overview of the scholarship that has explored various aspects of commercial sex comparatively. The two European projects are then presented in chronological order, followed by some reflections on the lessons we learned from them and how these lessons can be reconciled (or not) with contemporary attempts to harmonize prostitution policies across Europe and how they can form the basis for an alternative approach to prostitution policy making.

Comparisons in Prostitution and Sex Work Studies

This section on how comparisons have been developed in prostitution and sex work studies is organized around the methods and units of comparison adopted in this body of work. While not inclusive of all the explicitly comparative² work in the field, this review offers an opportunity to reflect on: 1. what these comparative analyses have contributed to the understanding of commercial sex and its complexities and, more specifically, of prostitution policy making; 2. what this scholarship reveals methodologically about comparability in the field; and 3. the relationship between the conditions that shape the knowledge produced in the field (and the many aspect that remain unknown) and policy-making. These reflections serve to identify some of the issues that emerged from the two projects and that are analysed and further elaborated later in the paper.

The expansion of the field of prostitution and sex work studies in the past three decades has encompassed a slowly developing body of research that takes an explicitly comparative approach. In the past decade in particular, prostitution and sex work scholarship

² All social research is comparative to an extent, and by using the term ‘explicitly comparative’ here we refer to ‘studies of societies, countries, cultures, systems, institutions, social structures and change over time and space, when they are carried out *with the intention* of using the same research tools *to compare systematically* the manifestations of phenomena in more than one temporal or spatial sociocultural setting’ (Hantrais 2009: 2; authors’ emphasis).

has been increasingly focusing on policy development. This may explain why comparative designs have recently become more significant in the field in an attempt to escape from ‘self-sealing’ analyses and to move closer to a holistic picture of how prostitution is regulated in different contexts and at different times and scales. Some of this work looks at similarities and variations in the organization and regulation of commercial sex across sub-national administrative and geographical entities, such as red-light districts, cities, states and regions (for example, Sanders and Campbell 2007; Sullivan 2010; Weitzer and Boels 2015), while other scholars take as their units of analysis different sex market segments within the same country (Hoang 2015) or city (Bernstein 1999). These examples show that not all comparative research in the field is cross-national, however far more prevalent are studies that develop comparisons between countries and with a focus on the regulation of commercial sex. Some of these studies map prostitution policies through seeking out qualities that are shared, or not, by a small number of countries, and trying to make sense of what accounts for any variation or similarity (for example, Harrington 2012; Hrzenjak et al. 2005). Others place a stronger emphasis on the modes of interventions utilized in implementing prostitution policies and the effects these have when are put into practice (for example, Hubbard et al. 2008; Kilvington et al. 2001; Pitcher and Wijers 2014; Skilbrei and Holmström 2013; Wagenaar et al. 2012). Yet others focus on the impact of policies, and specifically on actor-centred explanations of prostitution policy-making (for example, Outshoorn 2004; West 2000). Also comparing countries, but not concentrating directly on policies, are a few studies that look at other factors influencing commercial sex markets and practices, such as sexual behaviors and identities (Phua and Caras 2008), stigma in low-income occupations (Benoit et al. 2015), and gender relations in sexuality-related commercial websites (Pajnic et al. 2015).

Whether addressing prostitution policies, their configuration and implementation, or other realms of sex for sale, the studies presented above reveal a dominant comparative trend in the field, involving consideration of a small number of relatively similar units of analysis. Following the ‘most similar system design’ (Landman 2007), these are mostly countries which, despite strong commonalities, may present substantial differences in the organization, composition and/or governance of prostitution. Exceptions to this prevailing approach are a few studies that take a ‘most different research design’ (Landman 2007) approach by exploring a small number of countries chosen in light of their contrasting legislative frameworks and social policies as well as different histories and socio-cultural contexts (for example, Gangoli and Westmarland 2006; Kelly et al. 2008; Rodríguez García et al. 2017).

Finally, also worth mentioning are the few large-N quantitative comparative works in the field, all of which focus on establishing a link between prostitution legislation and the prevalence of trafficking (Cho et al. 2012; Jakobsson and Kotsadam 2013). While these pieces of research have received more attention than most of the other works mentioned above, they have also been widely criticized for methodological flaws that, it is argued, corrupt the validity of their comparative analysis, and therefore of their findings. For example, the changing meanings and therefore usefulness of the comparable measurability of the variables adopted in different contexts are not taken into account (see Weitzer 2015 and Zhang 2009, among others). Given these criticisms, the interest shown in them and the impact they have had are worthy of note. On one hand, they reveal the allure of the trope ‘more is better’ and the appeal of numbers as superior epistemological units that are unquestionably assumed to validate factual ‘evidence’ (Crowhurst 2017). On the other, they reflect an ideologically charged field where unsophisticated causalities – for example, as claimed by Jakobsson and Kotsadam (2013), that the criminalization of prostitution leads to a decrease in sex trafficking – serve to validate simplistic solutions to a very complex

phenomenon. We will return to this issue later, when we discuss how the search for a straightforward ‘solution’ to the problem of prostitution has been a cumbersome expectation of the projects we explore.

In the comparative works outlined thus far, the research scope and sampling choices made by the authors are generally explained to elucidate the rationale for comparison. Less frequent are more extended explanations of the methodological approaches underpinning the comparative analyses carried out. In general, it is fair to say that apart from Weitzer’s recent (2015) contribution, *Researching Prostitution and Sex Trafficking Comparatively*³, little has been written on methodological and epistemological considerations of doing comparative research in prostitution and sex work studies. This gap in the field represented an added challenge for us when we set out to design the methodological approaches of the two international comparative projects – we found ourselves treading in a rather uncharted territory, further compounded by our interdisciplinary ambitions, as we discuss later.

Overall, upon what methodological considerations of comparability in the field does the body of work presented here shed light? In addressing this question, here we wish to reflect on three aspects in particular.

Firstly, the units of analysis of this scholarship are unequally distributed, with some countries being significantly more researched than others. In the studies mentioned above, and more generally in the field at large, preponderant attention is devoted to the UK, USA, Sweden, the Netherlands and New Zealand. This is partly due to the exceptional political interest shown in the prostitution regimes of these countries across the globe, especially the latter three, often referred to as the examples *par excellence* of neo-abolitionism (Sweden), regulationism (the Netherlands) and decriminalization (New Zealand). But contributing to the

³ Here Weitzer reviews different types of comparative research designs in prostitution and sex trafficking and makes a case for having more comparative small-n studies, based on two to four national or subnational cases. This, he claims, is the best approach to enable the collection of more valid statistics, more reliable measurement and richer insights into the lived experiences of those operating in the sex industry (Weitzer 2015).

disproportionate amount of studies focusing on all five countries are also research capacity, funds, and cultures within them that have facilitated their more in-depth exploration, both as single cases and comparatively. This differential development and the reasons underpinning it represent a notable challenge for those who wish to carry out comparative, cross-country exploration in the field beyond these countries, as we experienced when, in the two projects, we tried to reach out and include a variety of different countries. If there is no research capacity, support and funding to carry out research in certain contexts, there will be no experts to reach out to and these countries will likely remain excluded from international studies and their realities silenced. We had many experts interested in participating in the projects from the countries where there already exists much research, and as a result these countries were much better represented than others. This differential development in the field has also broader political and policy implications. As we will detail below, in contemporary European countries, in many instances politicians and policy-makers look for data and evidence about the effectiveness of prostitution policies in different contexts, and comparisons are viewed as an efficient way of assessing the viability of different policy approaches. This is also true for the European Union wherein discussions on ‘European prostitution policies’ tend to be based upon and informed by the experience of those countries on which most of the research has been conducted. Obviously, it would not be possible to gain insights about prostitution modes of regulation within under-researched countries, and approaching policy-making by evaluating the scientific evidence available “can help in the practical task of identifying what is appropriate and reasonable” (Sanderson 2003: 343). But the conditions that shape scientific knowledge production should not be overlooked when assessing this very knowledge and the evidence it is based on. In other words, what is problematic here is that the prostitution regimes of more researched and better ‘publicized’ countries have become representative of prostitution policy models, which are expected to

have the same standardized outcome, irrespective of the context within which they are applied. As Munro and Della Giusta (2008) claim, the concern for a ‘best model’ has reduced the scope of debate in the field, trivializing the peculiarity of the cultural environment of comparator countries. Moreover, the often grand-sounding rhetoric about the success of some such models is not necessarily supported by adequate research and comprehensive knowledge both on how they are actually operationalized in practice at the implementation level and on their effects. If anything, however, prostitution policy ‘models’ have assumed greater relevance. An illustration of this is what happened in the process leading up to the issuing of a European Parliament resolution on prostitution policy in 2014.⁴ In preparation for a vote on the harmonisation of European prostitution policies around a ‘best model’ of prostitution governance, the Committee on Women’s Rights and Gender Equality issued a report, often referred to as the ‘Honeyball report’. In it, what is referred to as the (successful) neo-abolitionist ‘Nordic Model’⁵ (of which Sweden is used as primary example) is juxtaposed to the (failing) regulationist approach of which the Netherlands in particular is cited as a representative.⁶ The report and the resolution informed by it conclude that the Swedish model is the best and European states are urged to adopt it to achieve the same results it brought to Sweden, thus disregarding the importance of context to how policies work in practice. Wagenaar and Altink (2012) argue that the support for certain models is much more ideological than research driven. This is an important factor to take into account. And the fact that to this day there is still limited research on prostitution, its regulation and effects in many European countries works to the advantage of the model-approach and its ideological underpinnings. As European colleagues shared with us in the course of the two projects, the

⁴ <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P7-TA-2014-0162+0+DOC+XML+V0//EN>

⁵ See Skilbrei and Holmström (2013) for a problematization of a homogeneous ‘Nordic model’ and a detailed analysis of the notable differences in prostitution policies in the countries that are described as being part of it (Sweden, Norway and Iceland).

⁶ <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+COMPARL+PE-519.748+01+DOC+PDF+V0//EN&language=EN>

lack of research carried out on the governance of prostitution in their countries is not used as an incentive to create better conditions to develop such research, but rather serves to support their governments' evidence-resistance and endorsement of a particular exogenous 'model' based on the expectation that it will have the same alleged (and not necessarily evidenced) effects it achieved in the 'model country'.

Secondly, and related to the first point, data on commercial sex and those who operate in it remains rather piecemeal (Hubbard et al. 2008). This presents further disadvantages for cross-national research where the limited knowledge base in most countries reduces opportunities for comparison (Kelly et al. 2008). In comparing Nordic countries, Skilbrei and Holmström (2013) for example, had to contend with comparing larger amounts of data on Sweden with much smaller datasets on other countries in the region. Similarly, the comparative analysis of sex workers' experiences in the Netherlands and the UK carried out by Pitcher and Wijers (2014) entailed their grappling with rich research findings and evaluations in the Netherlands and limited primary research in the UK – an example that shows inconsistency of data and research even across more researched countries. One of the necessary choices to make when performing a comparison, is *what* is to be compared (Nelken 2010), and ideally one's preferred data is available in all units of comparison. The problem with the unevenness of data about prostitution is that researchers are often not able to compare data from similar sources, but are instead relying on different sources with differently measured data for different countries.

Finally, and more encouragingly, comparative research has shown the potential to contribute to opening up research scope on commercial sex by moving beyond the narrow focus on subjected female-seller, dominating male-buyer, and prostitution law 'in the books' that had previously dominated the field. As West (2000: 115) puts it, the findings of her own cross-national comparative study testify 'to increasing diversity of regulation which is

overlooked by concentrating on singular, national histories of the prostitutes' movement or by a focus on the prostitution-client encounter'. Indeed it is also through cross-national comparative work that a more nuanced and critical approach to prostitution policy models has started to develop. By showing, for example, that even when 'states adopt divergent policy positions they actually share significant common ground' and that different approaches can produce similar results (Hubbard et al. 2008: 141), or that 'decriminalization and/or regulation alone is not sufficient to protect sex workers' interests, nor facilitate more supportive forms of working' (Pitcher and Wijers 2014: 551), this body of work emphasizes the importance of comparing prostitution policies in context and in practice and not just in the abstract as neatly fitting into socially, politically and culturally unhinged models. As we further explain below, it was the need for more of this nuanced comparative and contextual work that spurred us into creating opportunities for international comparative collaborations in the field.

Towards a Comparative and Collaborative Exploration of Prostitution Policies in Europe

Setting the Scene

Writing on prostitution and the state in Italy in the 19th century, Gibson claims that at that time '[t]he debate about prostitution raged at international conferences and in the pages of legal, criminological, medical, and feminist journals read throughout Europe and the United States. [...] Experts and lawmakers divided into three international camps advocating either the prohibition, regulation, or decriminalization of prostitution' (Gibson 1986: 4). This very division over the different approaches that laws and policies should take to address

prostitution has not waned with time. If anything, over the decades the field has become more adversarial and ideologically charged, and the fissures between the three ‘camps’ listed by Gibson remain deeply entrenched. Little change has also been observed in the poor and dangerous working conditions of those selling sex, the stigma attached to them, and their involvement in prostitution as a form of gendered survivalism and victimization (Phoenix 2009). The landscapes of prostitution markets, however, have undergone substantial transformations since the 19th century. Most notable, with respect to its repercussions for prostitution policy making in Europe, has been the expansion of new forms of prostitution-related migrations, i.e. no longer from rural to urban areas as it had been in the past, but now mostly from economically developing societies to more affluent Western countries in the past three decades. This development, while contributing to the diversification in the composition and organization of commercial sex across most of Europe, has also prompted a resurgence of concerns around sex trafficking. Its eradication has become a political priority for European countries and European institutions, with the regulation of prostitution now inextricably connected with an urgency to fight sex trafficking. By the late 2000s these developments were at the forefront of prostitution policy debates across Europe, leading to notable and often radical policy changes in countries such as Finland, Germany, the Netherlands, Norway and Sweden. By then, other European countries also appeared to be very close to amending their national prostitution laws amidst fierce public and political debates, including Italy, France and the UK. In addition to more ‘newsworthy’ national-level prostitution policy changes and debates, various local level policies were also being passed in many European countries in the 1990s and 2000s. These may have elicited less national and international media and public attention but they often had swift effects, intended and unintended, on the lives of those operating in the sex industry. In yet other countries, prostitution received minimal attention, but political concerns and policy activities

devoted entirely to sex trafficking impacted directly on the working conditions of sex workers, for example in Portugal and Malta (for a more detailed discussion of some of the changes outlined above see: Crowhurst, Outshoorn and Skilbrei 2012; Jahnsen and Wagenaar 2017; Mattson 2016).

Taking stock of these developments in the mid 2000s, we found that limited cross-national analysis of prostitution and its governance beyond single-country studies reduced the exploration of the developments outlined above. Scholarship in the field was becoming stagnant and inward-looking, reaching similar conclusions which were not shared or compared among scholars, limiting opportunities to theorize beyond the particular. The contentious nature of domestic prostitution policy debates also meant that many scholars focussed more on national audiences to inform policy debates, rather than engaging in international exchanges. To overcome these limitations and hoping to facilitate a ‘bigger picture’ view and a comparative exploration of the ebullient status of prostitution policies in Europe, in 2008 we joined forces with our colleague Joyce Outshoorn in an attempt to establish a platform for exchange and collaboration among experts and researchers in the field and engage in a comparative exploration of prostitution policies in Europe, as further outlined below.

“Exploring and comparing prostitution policy regimes in Europe”: A European Science Foundation exploratory workshop (2010)

After a successful funding application to the European Science Foundation, we organized a three-day workshop on *Exploring and comparing prostitution policy regimes in Europe* which took place at Birkbeck, University of London in September 2010. The workshop brought together 18 participants with diverse disciplinary and experiential backgrounds in the field and with in-depth knowledge of the countries involved: Denmark, France, Germany,

Italy, the Netherlands, Norway, Portugal, Sweden, and the United Kingdom⁷. These were chosen in order to have a diverse group of countries with variations in prostitution regimes, in welfare and migration regimes and im/migration histories, and also with a view to including both ‘the usual suspects’, as discussed in the previous section, and countries that remained less visible or very much ignored in prostitution and sex work studies and in international debates.

At this event we set out to compare how nation-specific socio-political and cultural factors and the impact of global phenomena interlink and contribute to different understandings, responses and governance of prostitution in the European countries selected. We framed the workshop around the concept of prostitution regimes as defined by Outshoorn, that is the ‘sets of laws and practices governing prostitution that shape prostitution in their respective jurisdictions in distinctive ways’ (Outshoorn 2004: 6). This definition moves beyond the identification of prostitution governance as a purely ‘top-down’ regulatory, state-centred and unitary approach – for example abolitionism or regulationism – which is assumed to seamlessly achieve its goals when implemented on the ground. Outshoorn’s notion of prostitution regimes encourages to analyse the political and ideological underpinnings of laws and policies, the actors who participate or are excluded from their formulation, and their operationalization in practice, which often leads to outcomes that may well be in contradiction with the goals of national laws and the rhetoric that surround them. Thus, drawing on this approach, in this project’s framework we stressed the importance of looking not only at laws ‘in the books’ and what accounts for their formulation, but also at ‘laws in action’, including their localized effects. To this end, and to facilitate cross-national comparative analysis, in advance of the workshop we provided attendees with a set of issues

⁷ For more information on the workshop, see http://archives.esf.org/index.php?eID=tx_nawsecuredl&u=0&g=0&t=1514553903&hash=89b30dbbb843acb41031a37e81efa29100923e72&file=/fileadmin/be_user/ew_docs/09-249_Report.pdf

and questions to consider in preparing the presentations about their countries. These included historical and contemporary overviews of developments in prostitution policies, their multi-scalar implementation, the role of social services or/and other relevant agencies, the involvement or exclusion of sex workers' organizations, and the impact of policies on the living and working conditions of sex workers.

Overall, to paraphrase Nelken (1995), by addressing these issues country by country we were not aiming to immortalize the particular legal cultures and policies of the selected countries by treating them as self-contained units. Nor did we want to know about them for their own sakes, with a primary interest in understanding their particularities (Kohn 1987). In other words, we did not choose a cross-national comparative approach in which nation is object, but one in which nation is context. With this approach, as Kohn (1987) emphasizes, the purpose of the research is to use countries as the vehicle for investigating the contexts in which social institutions operate and social phenomena unfold (Kohn 1987), thus making it possible to relate 'patterns of legal behavior and action to phenomena which go beyond national boundaries' (Nelken 1995: 436).

Before turning to exploring the lessons we learned from this project, we should expand further on what we expected the workshop to achieve. Our main goal was to broaden our understanding of how prostitution is constructed in the nine national contexts, and, moving beyond them, to undertake an innovative analysis of the issues that account for differences and similarities in the governance of prostitution in contemporary Europe. In addition to this, we were aiming to explore 'ways in which research can make a concrete contribution towards the improvement of how prostitution and commercial sex are regulated in different European countries' (Crowhurst, Outshoorn and Skilbrei 2010, 2). With this latter goal, we did not set out with a normative vision to establish what the best prostitution policy model may be. Rather, we challenged ourselves and the workshop participants to explore

how prostitution policy researchers can explore fruitful collaboration and cross-fertilization with those involved in and affected by prostitution policy making. This was a challenging outcome to set and one that we ultimately were not able to achieve, as discussed below.

The intense three-day workshop proved to be fruitful and constructive, providing a space for a flourishing dialogue. Nevertheless, as Nelken puts it, the task ‘of understanding and mapping the differences among legal culture bristles with theoretical and methodological differences’ (1995: 435), and in the rest of this section we elaborate further on some of the differences we had to make sense of, and on the opportunities for learning presented therein.

The first point to note pertains to a well-known challenge in international comparative studies, how, if at all, the analytical concepts adopted translate across countries, cultures and languages, and whether they retain or lose equivalence and can therefore be workable comparative concepts (Hantrais 1999, 2009; Mills et al. 2006; Nelken 2010). One of the first issues we faced in this respect was about the use of the terms ‘prostitution’ and ‘sex work’. In some countries, most notably the UK, the choice of either term has become a signifier of an alignment with a substantive position on the phenomenon (Della Giusta and Munro 2008). The use of ‘prostitution’ and ‘prostitute’ is associated with abolitionist perspectives that view the selling of sex as violence against women, whereas ‘sex work’ was coined and is adopted both to assert the agency of those who consensually enter in commercial sex transactions and their labour rights as workers (ibid.). While ‘sex work’ has a normative connotation which is embedded in its original formulation and purpose, in some countries ‘prostitution’ and ‘prostitute’ are commonly used terms which, while not devoid of a negative connotation, are not necessarily associated with an abolitionist perspective. In some contexts, the equivalent of ‘sex work’ in the national language is rarely used outside of sex workers’ and activists’ circles, and in others, ‘sex work’ is not easily translatable and is therefore used in English, often limiting its broader understanding. Moreover, in most countries, ‘prostitution’ is the

term used in policy and law documents and in this context it is adopted to denote the commercial transaction of sex. In all countries, 'prostitute', even if still adopted as a legal term, retains to varying degree the stigmatizing properties of a label that signifies crime, deviance and 'whore stigma'. We were, also before the event, well aware of these terminological differences, but as a result of the workshop we have been able to nuance our thinking of these and to problematize how this terminology tends to be dominated by how it is played out in Anglo-American contexts. Reciting a point advanced by Mills et al. (2006), our cross-national comparisons of constructs allowed us to identify which definitions transcend a particular context or which are nation-bound, and in so doing also shed light on Anglo-centric paradigms and terminologies often taken for granted in the field.

Another issue of conceptual transportability emerged in relation to the names and meanings attached to so-called prostitution policy models, that is modes of prostitution regulation, such as (neo)abolitionism, (neo)prohibitionism, regulationism, legalization, criminalization, and more. Conflicting definitional issues with respect to how they may vary from context to context emerged vividly from the comparative work carried out at the workshop. As Kelly et al. also noted in their cross-national comparative work, the use and variations of different policy typologies is "not helped by occasional contrary re-workings in which conventional definitions of, for example, abolitionism, are inverted" (Kelly et al. 2008: 5). The differential and confusing use of the term abolitionism, for example, was also emphasized in the workshop. Whilst mostly used to refer to an approach that aims to abolish prostitution altogether, in countries such as Italy, abolitionism is more often used to indicate the abolishment of state regulation of prostitution, for example by making brothels and similar venues illegal. To complicate matters further, the term neo-abolitionism is now frequently adopted to refer to the so-called 'Nordic' or 'Swedish model' which outside of Sweden tends to be reductively viewed as an approach that criminalises the purchase of

sexual services. But the ‘Swedish model’ is, or least was meant to be much more than that, encompassing both the criminalization of the purchase of sex and a complex set of social welfare policies aimed at providing support to both those who sell and those who buy sex (Florin 2012 and Skilbrei and Holmstrom 2013). As the appeal of the highly publicized ‘Swedish model’ travelled across Europe it lost its foundational social welfare component, becoming a symbol of punitivism via the criminalization of clients. Indeed, some refer to it as an example of prohibitionism or neo-prohibitionism, stressing its ultimate goal to eliminate sex work by quenching the demand for it (Danna 2004; Matthews 2008). These conflicting definitional issues and the various losses in translation they entailed emerged vividly from the comparative work carried out at the workshop, and discussing these gave us the opportunity to establish some semantic equivalence in order to be clearer about what we were talking about and thus to facilitate the discussion. But more importantly, it revealed some substantive traits within this field. Firstly, the fixation in most countries’ public and political discussions on prostitution (and in some scholarship as well) upon policy models combined with the tendency to ignore how these models translate into practice when implemented. Secondly, our cross-national work showed that the ways in which these models are understood varies cross-nationally, often being based on ‘picking and choosing’ of what is deemed workable in a national context and what might be politically convenient at any given time.

Related to the considerations above were also questions raised by one of the participants about whether the workshop’s focus on policies had been too narrow. Were we not reifying policies, and in doing so ignoring the lived realities of those operating in the industry? Can we understand socio-legal responses to prostitution and their effects cross-nationally by looking at prostitution policies alone? As mentioned earlier, in framing the workshop around a prostitution regimes analysis we had been careful not to focus exclusively on prostitution modes of regulation as they appear on paper, and stressed the importance of

looking at how they are implemented and with what effects. Nevertheless, as our colleague pointed out, and indeed as had emerged from the general workshop discussion, prostitution and the lives of those involved in it are not only affected by prostitution policies but also by many other policies not directly related to commercial sex *per se*, including immigration, taxation, and licensing laws, planning and regeneration decisions, and the criminalization of drugs and anti-social behaviours. This was a crucial point which we took into account in the formulation of the second project, and in the approach we propose at the end of this contribution. Similarly, looking at the roles and choices of policy makers, administrators and prostitution policy enforcers at different scales of governance is not enough and greater attention should be paid to other institutions and actors such as the media, social work, NGOs and IGOs, and interest groups who play an important part in shaping debates, discourses and policies in different contexts. While a three-day workshop could only realistically have a limited scope, considerations on the breadth of the analytical reach of comparative cross-national work on prostitution and its regulation were very important in formulating the more extended project that we discuss in the next section.

Finally, in carrying out comparative work in the workshop we faced some of the comparability challenges outlined in the earlier literature review section. The lack of cross-national comparable data, for example, was evident. The reasons for this limitation in the field are plenty, as mentioned earlier and as the workshop emphasized this also results from different empirical research traditions and opportunities across countries in many of which prostitution is a stigmatized topic to research and scholars are discouraged from focusing on it (see also Hammond and Kingston 2014). The lack of institutionalized and funded platforms for exchange of research findings and theoretical development, coupled with the ideological fencing-off between countries with different regulatory approaches, urged the workshop participants to develop further collaboration and investigation of these issues amongst

European researchers. The workshop had been too brief to disentangle many of the problems that render cross-national studies both rich and challenging. More time was needed to advance a methodological framework of analysis sensitive to political and legal cultures and administrative structures across Europe, and to be able to establish a meaningful engagement with policy makers and stakeholders in the field. In sum, more epistemological labour was required to develop the comparative work started.

“Comparing European prostitution policies: understanding scales and cultures of governance”: COST Action Prospol (2013 –2017)

Encouraged by the productive work carried out during the ESF workshop we teamed up with three colleagues who shared our ambition to develop further the collaboration and comparative explorations we had started. This engagement led in the first instance to a special issue on prostitution policies in Europe (Crowhurst, Outshoorn and Skilbrei 2012). Its contributors presented complex explorations of what happens when prostitution policies are implemented and made operational at different scales of governance, and often in conjunction or in conflict with policy instruments pertaining to other policy domains. The richness of these investigations of ‘law in action’, we argued in the special issue, would be lost if prostitution policy analysis only focussed on their formulation ‘in the books’ – a point that represented a foundational block also of our new project.

In thinking about how to further develop our collaboration, we agreed that rather than initiating a new research project we would benefit more from the establishment of a European platform for collaborative study which would bring together experts in the field who do not and/or cannot normally pay attention to each other’s work. The COST program which funds four-year networks, so-called Actions, which are aimed at facilitating

collaborations, building capacity and increasing research impact was the ideal scheme.⁸ After a successful application, COST Action Prospol “Comparing European prostitution policies: understanding scales and cultures of governance” was officially launched in April 2013.⁹

The core objective of creating this European network was to ‘compare and disseminate knowledge about the multiple contexts, features and effects of prostitution policies at the European, national and local level’ (MoU 2013: 3). The contextual dimensions of prostitution policies – including local cultural contexts, administrative structures and cultures, gendered regimes, sex markets’ delineations, media representations, and bodily, economic and sexual citizenship – were given prominence in the design of the Action. We did not conceptualize ‘context’ as an added frame that contours and complements the picture of prostitution policy. Rather, we viewed ‘context’ as what makes and gives shape to the picture itself, its very essence. Without understanding what this context is, what constitutes it, how it operates and how it changes over time, the analysis of prostitution policies, as stressed above, remains abstract and reductive. Also crucial in developing the Action’s framework has been Scoular’s work (2010) on the role of law in shaping contemporary power relations. Law and society, Scoular argues, are mutually constitutive, ‘law’s increasing hybridization with norms means that it is imbricated in the everyday world’ (2010: 38) and it operates in it ‘through freedom and much as through censure’ (2010: 36) by ‘regulating and authorizing the spaces, norms and subjects of contemporary sex work’ (2010: 39).

By privileging context and seeing law as productive, and by paying attention to how the two are mutually constitutive, we gave shape to the conceptual apparatus of the Action. Rather than prioritizing the nation as a key unit of analysis, as we had done in the ESF workshop, we organized the Action around three scientific tasks to explore the different contextual dimensions of prostitution policies. The first task was to map and consider

⁸ www.cost.eu

⁹ The Action has over 90 members from 25 countries, 23 from the European geographical areas, and 2 international partners (New Zealand and the USA) [www.prospol.eu]

prostitution policies and politics and their local variations in Europe, as well as their intended and un-intended effects. The second task was to explore the economic dimensions of prostitution by looking at the operations of money, markets and economic rationalities in commercial sex. The third task was to look at the symbolic and cultural meanings attached to how sex and money are linked and separated in different societies and at different times. These tasks were operationalized into three Work Groups which met twice-yearly at Action events. In the course of the latter, we also organized plenary sessions with invited speakers, and dissemination meetings with local stakeholders – including sex workers, NGOs, politicians, and local administrators – on prostitution policies and practices in the country that hosted the events (Greece, Spain, Austria, Portugal, Slovenia, Croatia and Denmark).

As the Action has been an active and productive ‘epistemic entity’ for four years it is not possible to do justice here to the many outputs, activities, further projects, capacity-building and much more that have been facilitated. Rather, continuing with our reflexive approach, in the next sections we outline some of the lessons we have learned from it and that we believe can add to our understanding of the comparative analysis of prostitution policy.

One peculiarity of COST Actions is that their constituency is not entirely controlled by the Action’s steering group.¹⁰ COST, via its member countries, can appoint individual members to any given Action. This flexible model, coupled with the many attendees we invited to the meetings we held, meant that people came to the ‘Action’s table’ with different visions and reasons for being there. Trying to accommodate this, and having learned from the ESF workshop, we did not seek to establish a common and homogeneous terminology for everyone to adopt, nor did we assume that we were all speaking to the same issues (Nelken 2010). Indeed, the Action offered further opportunities to look at what accounts for the differences in meanings of concepts adopted in the field, by people who are situated in

¹⁰ The Action’s steering group comprised nine members, including the authors.

different national contexts, who operate within different disciplines, and who have different types of involvements in prostitution policy studies (for example as researchers, activists, sex workers and/or a combination of these). Being able to bring together such a diversity of interested parties has been, from our perspective, one of the greatest achievements of the Action. Experts in the field whose work is well-known in their own national context were able to communicate it to a much broader audience and compare it with the findings of others. Similarly, the rich theoretical and empirical work of early career researchers, many of whom struggle in their academes due to the contested nature of their research topic, were also crucial to the development of our comparative analyses. Many collaborations, in the shape of publications, research projects, colloquia and more, have been initiated by Action members, who often knew very little about each other's contexts prior to the Action. The sharing of multiple perspectives thus contributed to challenging the dominant focus on the few countries that, as mentioned earlier, are taken as representative examples of particular modes of regulation.

As mentioned above, building on the ESF workshop the Action made three contextual dimensions of prostitution policies central to its framework, allowing for the exploration of their relevance and variability cross-nationally by Action members who collectively have expertise of over 30 national contexts. We were aware that this theoretically informed tri-partition, translated into the three WGs, was a heuristic device and that these three dimensions are not empirically separable. However the practical necessity to create sub-groups to organize work coupled with the separation of 'contextual dimensions' whose boundaries and delineation are fuzzy and contestable represented a notable challenge. We tried to overcome the latter by facilitating exchanges that could reflect better the intersections between the three contextual dimensions identified, for example by organizing sessions on stigma and sex work, neo-abolitionism, the quality of working life in the sex industries, sex

work and human rights, and sex work and neoliberalism. These sessions brought to light concerns about themes and issues that have been discussed in the field for decades but whose meanings have rarely been interrogated.

While we were keen to leave room for members to influence the development of the Action, this also meant that some of our initial ambitions were harder to fulfil. For example, it proved difficult to move beyond the context-insensitive model-centric approach to prostitution policy. Time and again in Action debates the models continued to serve as firm starting points for discussions, but the fixation with models also became an issue in other respects. The Memorandum of Understanding of the Action acknowledges that there is a ‘a heightened demand for effective models of regulation, for legal harmonization and sharing practice across jurisdictions’ (2013: 3) and claims that it is difficult for policy makers to maneuver in this field because the research is fragmented and researchers do not communicate enough with each other or with policy makers. When this document was written a belief was shared among its authors that more or better research that is better communicated could make a contribution to improving policy making in the field. While we retained this ambition throughout the four years what was meant by impact and what impact we were expected to deliver changed over time, also in light of broader socio-legal and political developments in Europe, as we further discuss below.

During the lifetime of the Action, new prostitution policies were introduced in some European countries, and in others consultations and debates were started with a view to changing modes of regulation. In addition to this, prostitution policy returned to the European agenda, as seen earlier, with the European Parliament signature in 2014 of the non-binding resolution that European member states should adopt the ‘Nordic model’. As these developments unfolded we found ourselves in a situation whereby as an Action we were emphasizing and trying to unpack the complexity and multiple contextual dimensions of

prostitution policies while political and public debates were played out around a simplified binary framework constituted by either the neo-abolitionist or the regulationist models.

As a large EU funded network dedicated to the task of improving the understanding of prostitution policies, when we were approached by various media outlets and other interested parties at Action events, a recurrent question asked was about which approach to prostitution regulation the Action had determined to be the best. Our dedication to the context-boundedness of ideas and policies was strengthened during the course of the collaboration, and in the end made it impossible for us to offer direct advice for European states as to what prostitution policy model to apply. However, it was not particularly interesting for those who consulted us to hear that our comparative work had emphasized avoiding both rushing to a quick-fix simplistic solution and expecting that this could be achieved with one specific ‘model’. As Hantrais (2009) points out, the expectation that international comparisons with a policy dimension will inform policy is widespread. However, if anything, the depth and breadth of the comparative work done by the Action’s members had steered away from the identification of a best model to be transposed indiscriminately across Europe. In the context of politically charged and policy relevant debates, it is difficult to withdraw from ‘making an impact’; something European scholars are increasingly expected to do. In these circumstances, and often under pressure, however, ‘impact making’ can end up being shaped by state-centred categories and simplistic problem definitions (Armstrong, Blaustein and Henry 2017) that hinder the ability to juggle the complexities that the issue under scrutiny and requiring to be impacted upon entail. As one of our members said at the final meeting of the Action, while we were careful not to endorse ill-fitting homogeneous policy ‘models’, others, with little and/or problematic evidence (as referred to earlier, for example, in relation to some large-scale comparative quantitative studies in the field), but strong ideological cases (such as the author of the ‘Honeyball report’, mentioned above) “are winning”. They are able

to make an impact in informing the shape of prostitution policies in Europe by providing support for simplistic and attractive policy models that delegitimize efforts to look more in-depth at the contextual specificities of the sex industry and of those involved in it.

This does not mean that our work had or will have no impact at all. We believe that both projects analysed here contributed to the creation of an epistemic community with the capacity, as mentioned earlier, to “start something going” (Pohoryoles and Sors 2017: 1), including challenging what Brand and Vadrot refer to as epistemic selectivities, i.e. those entrenched and dominant mechanisms “in political institutions that favour specific forms of knowledge, problem perceptions, and narratives over others” (Brand and Vadrot 2013: 207, as cited in Vadrot 2017: 69). Concrete examples of these contributions have been the various meetings that we organised in different European countries with the active participation of a variety of local and national stakeholders and attracting media interest, spurring debates on the issue of prostitution policy by paying attention to the many actors involved and to the complex contextual sensitivities and structural conditions of different countries. Indeed it was during these meetings and the discussion that ensued that we started elaborating an alternative approach to the model-centrism of prostitution policies.

As we shared research and engaged with stakeholders in different European countries during the four years of the Action some common problems were brought to light across countries and scales of governance that did not seem immediately tied to the type of prostitution policy in place. Firstly, all too often prostitution policies are designed without or with little direct consultation and involvement of relevant stakeholders, including sex workers, sex workers’ organisations, NGOs and IGOs which operate in the field, and interest groups variously involved and affected by commercial sex. The wealth of empirical research carried out and disseminated by sex workers’ advocacy organisations remain often ignored, despite the invaluable contribution it can make to better understand who is involved in

commercial sex, how, and what outcomes different policies may have on them. This became particularly clear during an Action meeting on the theme of ‘collaborative governance’ (Johnson 2015 and Weir 2010) where the positive experience of sex workers’ participation in the making of the 2003 New Zealand Prostitution Reform Act was shared by the New Zealand Prostitutes’ Collective. Secondly, the selective use of ‘knowledge’ and ‘evidence’ by policy makers to support particular positions are notable problems in the field. These need to be addressed with heightened accountability on the part of both those who produce this evidence and those who choose to use it selectively. As a result of both policy makers’ narrow engagement with stakeholders and lack of or biased application of existing knowledge, possible harms and problems resulting from policy implementation are not always explored in the policy making process.

By giving priority to these factors, and trying not to live up to the stereotype of social science researchers unwilling to communicate to policy makers in an unambiguous and immediate way (Hantrais 2005b), we designed a ‘test for policy makers’ which is aimed at stimulating more context-sensitive thinking about prostitution policy making.

Figure 1 here

Trying to be both very straightforward, and designed ‘tongue in cheek’ as a board game, this flowchart stresses the need for: 1. broader participation and collaboration of key stakeholders, with an emphasis on the need to involve oft-excluded sex workers’ organisations and representatives; 2. accountable and methodologically rigorous evidence gathering and analysis, which needs to take into account the many laws, policies and systems of regulations which play a key role in shaping the organisation of commercial sex and the lives of those who operate in it. As mentioned earlier, these include immigration, taxation, and licensing

laws, planning and regeneration decisions, the criminalization of drugs and anti-social behaviours, and others which will be specific to the context in which the policy process is taking place; 3. forward thinking about how these complex layers of policies are going to be implemented, by whom and with what results. This is a necessary step to think ahead about the possible harms and negative impacts of the proposed policies on the many people who are going to be affected by them; 4. willingness to change approach and policy direction based on these three interlinked processes, especially in light of their potential negative impacts. We believe that by emphasising the need for collaborative reflexivity by those who are involved in, and affected by prostitution policy making, this chart represents a more sustainable alternative to the identification of a, supposedly, ideal policy model.

We wish to conclude this section by acknowledging that this chart has been characterised by some as a rather *underwhelming* result of the collaborative and comparative labour carried out in the course of the two projects.¹¹ Some participants and audiences expected an output of the projects to be clear advice to policy makers on the adoption of a particular ‘model’. This, as mentioned earlier, was collectively discussed in particular during the second project, but concluded to be an undesirable goal also in light of our context-sensitive approach. Similarly, the chart that the two of us have designed and presented here does not offer advice on what ‘model’ to follow, but is instead intended to provide rather simple, perhaps even very obvious, advice on what processes to engage in in prostitution policy making. And this obviousness is exactly the point of the chart. As the engagements and exchanges with prostitution experts in over twenty countries have revealed to us in the past few years, these very commonsensical policy-making steps are rarely considered, let alone implemented, in prostitution policy-making. Underwhelming as it may be, this chart and the processes it outlines present an alternative to uniform one-size fit-all models, by

¹¹ However, as mentioned earlier, this is certainly not the only outcome achieved: many new studies, publications, capacity building initiatives, grant applications and more have emerged and are still emerging from the collaborations that have been forged through the projects.

encouraging approaches to thinking and designing prostitution governance which are attentive and sensitive to the specificities of the contexts it applies to, and to those who have a stake in and are impacted by the process and its outcomes.

Conclusion

In this paper we engaged in a reflexive exploration of the epistemological labour we invested in conceptualizing and coordinating two comparative projects on prostitution policies in Europe. We used the term epistemological labour to give emphasis to the effort invested in both the elaboration of the conceptual frameworks of the projects and the methodological approaches employed. We also discussed how the assumptions underpinning these same projects were put to the test through the theoretical, empirical and political challenges that we encountered in their life course.

Both the review of existing literature on comparative research on prostitution policies and the actual processes of carrying out comparative analysis in the field revealed the latter's limited and uneven development, the lack of uniform and comparable data, the dominance of Anglo-centric paradigms, and a stubborn concern with rigid and normative policy models. Despite the challenges that these limitations present to comparability in the field, we argued that reflexive comparative analysis offers the potential to move beyond the model-centric approach to prostitution policies and to counteract ethnocentric paradigms and concepts that can easily, but problematically, become established as hegemonic and universally valid. Drawing upon our experiences of working on the projects we stressed the importance of giving priority to context-sensitive approaches and analysis in accounting for the multiple factors that give shape to understandings of prostitution and its regulation. While we argued that comparative work can move our thinking forward in the divisive field of prostitution policy studies, we warned against expectations that cross-national analyses should firmly

establish a ‘best model’ for prostitution regulation. Related to this, the paper went on to discuss how research is itself always context-bound and shaped and influenced by shifting political debates and priorities, as well as local and global phenomena. The push towards the Europeanization of prostitution in particular became an issue for us and the complexity that our projects had prioritized were at odds with calls for researchers to produce more straightforward and quick-fix solutions to the problem of prostitution. Mindful that aiming for a complex analysis of prostitution remains an important commitment, that our comparative analysis has strengthened, we concluded the paper with an example of how, rather than settling for unrealistic and trivializing models, prostitution policy making can be enhanced by reflexive, context-sensitive and collaborative engagements.

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