

Prostitution in the Nordic Countries

Conference report, Stockholm, October 16–17, 2008





Prostitution in the Nordic Countries

Conference report, Stockholm, October 16–17, 2008

Charlotta Holmström & May-Len Skilbrei

Prostitution in the Nordic Countries

Conference report, Stockholm, October 16–17, 2008

ANP 2009:756

© Nordic Council of Ministers, Copenhagen 2009

ISBN 978-92-893-1930-0

Only available as pdf

Cover: Toppetasjen I Oslo, <http://www.Toppetasjen.net>

Other Nordic publications are available at www.norden.org/publications

Nordic Council of Ministers

Store Strandstræde 18
DK-1255 Copenhagen K
Phone (+45) 3396 0200
Fax (+45) 3396 0202

Nordic Council

Store Strandstræde 18
DK-1255 Copenhagen K
Phone (+45) 3396 0400
Fax (+45) 3311 1870

www.norden.org

Nordic co-operation

Nordic cooperation is one of the world's most extensive forms of regional collaboration, involving Denmark, Finland, Iceland, Norway, Sweden, and three autonomous areas: the Faroe Islands, Greenland, and Åland.

Nordic cooperation has firm traditions in politics, the economy, and culture. It plays an important role in European and international collaboration, and aims at creating a strong Nordic community in a strong Europe.

Nordic cooperation seeks to safeguard Nordic and regional interests and principles in the global community. Common Nordic values help the region solidify its position as one of the world's most innovative and competitive.

Contents

1. The project „Prostitution in the Nordic Countries”	7
1.1 Introduction	7
1.2 Background	8
1.3 Goals, issues and country studies	9
2. Summary of the project’ results.....	13
2.1 Scope and prevalence.....	13
2.2 Social and judicial remedies.....	18
2.3 Attitudes and beliefs.....	27
3 Discussion	35
3.1 Prostitution as a social problem.....	35
3.2 Conclusion	40
Sources.....	41

1. The project „Prostitution in the Nordic Countries”

1.1 Introduction

Prostitution is an issue that stirs the interest of both politicians and the general public. The fact that people pay for and sell sex is considered a challenge for the Nordic welfare states. It is complicated, however, to devise a policy to deal with prostitution, not least because the market is constantly changing. There are differences and similarities between the Nordic countries in terms of the development of the prostitution market, the scope of prostitution, related legislation and social interventions, and attitudes and beliefs regarding prostitution. Both historically (Pedersen 2007) and today (Skilbrei 2003), prostitution has been used as a tool to compare the Nordic countries.

There is an urgent need for knowledge about the different solutions that the different countries have tried in response to the shared challenge of prostitution. The Nordic Ministers for Gender Equality (MR-JÄM) commissioned the Nordic Gender Institute (NIKK) to carry out a research project to focus on the Nordic countries' differences and similarities in devising prostitution policies. The aim of the project was to describe, illustrate and analyze the state of prostitution and human trafficking for sexual purposes in the Nordic countries today. The project was launched in order to create a shared knowledge base that stems from a gender equality perspective. Eleven Nordic researchers from various disciplines in the Nordic countries participated in the project. Charlotta Holmström, PhD, and May-Len Skilbrei, PhD, headed the project. The project was carried out over one year, and researchers worked with three problem areas: (1) scope of prostitution and human trafficking for sexual purposes in the Nordic countries, (2) judicial and social action to combat prostitu-

tion and trafficking for sexual exploitation in the Nordic countries, and (3) attitudes and beliefs regarding prostitution and trafficking for sexual exploitation in the Nordic countries. Also included was information from the autonomous areas, from Faroe Islands, Greenland and the Aland Islands.

The aim of this report is to present and discuss the main results from the research project. First, we will discuss the constantly changing market for prostitution as well as the different approaches taken by the Nordic countries to address the situation. Then, results from the different components of the project will be presented along with the particular issues they address. The report concludes with an analytical discussion of the questions explored within the project as well as the results.

1.2 Background

The political and economic changes of the last decades have played a part in the way that the market for prostitution has developed both in and beyond the Nordic countries. Above all, growing global inequality and changes in the border policies between Western Europe and former Soviet areas/Eastern Europe have resulted in a situation where transnational prostitution to the Nordic countries has increased.

The growing number of foreign women working in prostitution has placed the question of trafficking for sexual exploitation high on the political agenda. All of the Nordic countries have developed strategies to address the problem, both in the form of prevention, judicial remedies, and victim support. The changing situation is creating challenges for each country's judicial and social welfare systems. Another consideration is that the Nordic countries have signed and ratified international conventions on human trafficking. All of the Nordic countries have signed the UN Protocol on human trafficking, the so-called Palermo Protocol,¹ which went into effect in 2003, and they have passed their own prohibitions against human trafficking in response to the Protocol's obligations. Each country has also signed, and Norway and Denmark have ratified, the

¹ All of the Nordic countries, with the exception of Iceland, have also ratified the Palermo Protocol; i.e., the Protocol has been confirmed and its articulated goals have been sufficiently incorporated into domestic legislation and measures. Denmark has signed and ratified the Palermo Protocol, but Greenland and the Faroe Islands are exempt from the Protocol's obligations.

Council of Europe Convention on Action against Trafficking in Human Beings, in effect as of 2008.

1.3 Goals, issues and country studies

The overall aim of the project was to develop and expand knowledge about prostitution and human trafficking for sexual purposes in the Nordic countries. Three main objectives were to:

1. Describe and review estimated numbers of men and women in terms of prostitution and human trafficking for sexual purposes in the Nordic countries
2. Describe and analyze legislation and social interventions to address prostitution and human trafficking for sexual purposes in the Nordic countries
3. Map out and describe attitudes and beliefs regarding prostitution and human trafficking for sexual purposes among Nordic men and women.

The first objective has been to compile information about the scope of prostitution and human trafficking for sexual purposes. One ambition has also been to critically evaluate and explore various methods used in making such estimates. Researchers have approached this task in a number of ways and using different methodologies. The studies particularly focus on official documents, compiled data obtained from various authorities and organizations, and research reports. In many cases, data was complemented through interviews. In the Norwegian component of the project, Marianne Tveit and May-Len Skilbrei take on the question of scope and prevalence in relation to the social measures taken in Norway. Charlotta Holmström focuses on the information available from Sweden. In the Danish section, Marlene Spanger and Jeanett Bjønness discuss the hazards of trying to quantify the number of persons involved in prostitution. Anne-Maria Marttila examines available estimates from Finland. The Icelandic article, too, consists of a presentation and discussion of the scope of prostitution and trafficking for sexual exploitation in Iceland.

The second main theme of the project is focused on how prostitution and trafficking for sexual exploitation are addressed through social and

legislative action. Researchers from each of the five Nordic countries describe existing legislation and how it came into existence. They also analyze how the issue has been addressed through social measures as well as how such measures are ideologically grounded. In her article, Skilbrei describes the judicial treatment of prostitution in Norway. Here, the main theme is the relationship between the “pimping paragraph” and the human trafficking paragraph in Norwegian legislation. Further, Tveit and Skilbrei describe the various social interventions and services available in Norway, with a focus on how they function in relation to one another. In her piece, Annelie Siring discusses Swedish legislation. The starting point of the discussion is a qualitative study that illuminates how authorities interpret and apply the Act Prohibiting the Purchase of Sexual Services. In the Danish section, Marlene Spanger explores human trafficking in Denmark and analyzes developments and amendments to legislation. The situation in Denmark is also the subject of Jeanett Bjønness’ article, which analyzes the formation and evolution of social measures over time. In the case of Finnish legislation, Marttila talks about the handling of transnational prostitution in the justice system. Finally, Gísli Hrafn Atlason and Katrín Anna Guðmundsdóttir discuss the way that Iceland deals with prostitution and trafficking for sexual exploitation through its justice system and social interventions.

The third main theme of the project is examining attitudes and beliefs regarding prostitution and trafficking for sexual exploitation. The country studies were designed in different ways. Jari Kuosmanen’s article presents the results of a quantitative study of attitudes toward the Sex Purchases Act and people’s experiences of buying sex in Sweden. In Norway, Synnøve Jahnsen chose to look for answers through two qualitative studies. Through media analysis, Jahnsen describes how views of prostitution and trafficking for sexual exploitation are manifested in debates about the criminalization of clients. Elsewhere, Jahnsen presents results from a qualitative study of the ways in which prostitution and the criminalization of buying sex have been discussed on the website www.sexhandel.no [Norwegian website dealing with the trafficking for sexual exploitation].² Marttila’s Finnish contribution focuses on the debate on criminalization of the purchase of sex that has taken place in Finland and the ways in which people’s attitudes regarding prostitution

² The website was initiated and is financed by the Ministry of Children and Equality.

and human trafficking for sexual purposes have been manifested in it. In the Danish studies, both Bjønness and Spanger were interested in the views of official actors toward prostitution and how they are reflected in how social and judicial practices are shaped. Atlason and Gudmundsdóttir review results from previous studies on attitudes and beliefs in Iceland regarding prostitution.

All in all, the country studies provide a comprehensive view of the situation as it stands in and between the Nordic countries. To some extent, it is possible to conduct descriptive comparisons in terms of scope, prevalence, and judicial and social action. Results from studies on attitudes and beliefs do not yield descriptive comparisons. Instead of conducting empirical comparisons, these country studies are focused on deepening our understanding about attitudes toward prostitution and human trafficking through a number of empirical and national contexts.

2. Summary of the project' results

2.1 Scope and prevalence

The discussion of the scope of prostitution and human trafficking for sexual purposes in the Nordic countries is a critical one for a number of reasons. The market for prostitution today is highly differentiated. It is assumed that most of prostitution in the Nordic countries takes place indoors. At the same time, estimates are to a large extent based on observations and registration of visible street prostitution. The increase in the number of foreign women selling sex, cases of trafficking and persons advertising on the Internet, has also resulted in a situation where police and social authorities have trouble monitoring the scope of these activities. It is also difficult to judge how many women have been trafficked into the Nordic countries, because there are obvious shortcomings in the methods for counting trafficking victims. For the most part, the number of victims comes from prosecuted cases and/or information obtained from social workers or other organisations. At the same time, there is reason to believe that most victims of human trafficking rarely become known to authorities. There are also difficulties involved in determining what constitutes human trafficking and what does not. The line between prostitution and human trafficking is drawn differently in different cases, meaning that something that is handled as a prostitution issue in one country may be viewed as a case of human trafficking in another.

The way in which information about scope is generated varies from one country to another. Above all, in assessing the number of persons involved in prostitution and victims of trafficking for sexual exploitation, the differences have to do with who is making estimates and how. In their Norwegian study, Tveit and Skilbrei report on the scope of prostitution and human trafficking and write that the responsibility for information

gathering in Norway is mostly in the hands of Pro Sentret.³ The persons involved in prostitution who get counted in the annual survey in Norway are largely those who have been in contact with Pro Sentret and its staff, either through social workers doing outreach or through seeking help on their own. Pro Sentret also keeps count of advertisements for prostitution services in print newspapers and on the Internet. Beyond that, there is oversight of street prostitution areas in Bergen and Stavanger through services targeted at persons in prostitution. Pro Centret reported that in 2007, there were 2,654 women selling sex in Norway, 1,157 of them on the streets. Since estimates of persons in prostitution are based on those who have had contact with support services or placed advertisements, Tveit and Skilbrei maintain that not all prostitutes get counted. For example, essential information is missing about men who sell sex. Tveit and Skilbrei conclude that it is the methods currently used for counting and the view of prostitution that determine the kind of information that is generated. Consequently, the authors claim that it is critical to pay close attention to the methods and perspectives at work in making number estimates. There has been a sharp upward shift in the number of foreign prostitutes working in Norway. It is difficult to estimate how many foreign women are working as prostitutes and how many have been trafficked. Tveit and Skilbrei describe numerous problems with efforts to determine the scope of human trafficking. How can the different estimates made by various organizations, using different methods, be combined? What information should the estimates be based on? It should be pointed out that the number of actual convictions probably only reflects a small fraction of the real number of people who are being exploited in prostitution and in migration processes to Europe. Skilbrei further elucidates this in her article.

In Sweden as in Norway, it is primarily social workers who are responsible for evaluating the state and development of the prostitution market. Most of the focus is on domestic prostitution. Groups working with prostitution in three of Sweden's largest cities obtain information about scope and prevalence through the people they meet through their work; on the street, in counselling and therapy. Simultaneously, the Na-

³ Pro Sentret (the "Pro Centre") is a resource centre in Oslo that offers social services targeted at female and men selling sex. It also serves as a national resource centre for prostitution-related issues.

tional Board of Health and Welfare (Socialstyrelsen) is responsible for monitoring overall development over time by regularly collecting and accounting for all information about the Swedish prostitution market. The national Criminal Investigation Department (Rikskriminalpolisen) is responsible for describing and monitoring developments in human trafficking through issuing regular reports. In her Swedish study, Charlotta Holmström accounts for all of the information that is currently available. According to that information, approximately 300 women work as street prostitutes and about 300 people advertise on the Internet. It is uncertain how many people are victims of trafficking. Groups working with prostitution have noted a successive decline in street prostitution over the last ten years. It is not clear how this decline should be interpreted against the Swedish Sex Purchases Act or the development that has taken place in terms of communication methods, including the Internet and mobile telephones. It is, however, clear that the prostitution market has changed and is increasingly differentiated. Like Tveit and Skilbrei, Holmström underlines how important it is to evaluate the methods and perspectives used in determining scope. According to Holmström, the available knowledge is characterized by a certain view of prostitution and by the specific context in which it was produced. Very little is known about indoor prostitution or about the men who sell sex, which must be viewed in light of the particular segments of the prostitution market that are being considered. Also, the information that is available about the men who buy sex is quite limited.

A new trend in the Danish prostitution market is that more than ever before, prostitution is channelled through massage parlours and escort services. Simultaneously, street prostitution has become much more visible in Copenhagen in recent years through the increased number of foreign women (Rasmussen 2007: 34). In Denmark, prostitution is increasingly advertised on the Internet, and the possibilities for estimating the scope of prostitution are limited. Meanwhile, newspaper and Internet advertisements are specifically used for determining how widespread prostitution in Denmark is. According to calculations by the Danish Centre for Research on Social Vulnerability (Videns- og formidlingscenter for Socialt Udsatte),⁴ in the period between June 2006 and June 2007

⁴ The centre is part of the National Board of Social Services (Servicestyrelsen), an independent subdivision of the Ministry of Social Welfare (Velfærdsministeriet).

there were at least 5,567 persons working in the visible realm of prostitution (Socialministeriet [Ministry of Social Welfare] 2007). In this figure, so-called clinic prostitution was most extensive (3,278), followed by street prostitution (1,415). In her article, Bjønness talks about how estimated figures about the scope of prostitution are used as starting points for discourse and policy, even though they are uncertain. In the invisible – and presumably vast – grey area, there are those who do not advertise, under-cover prostitution on the Internet (for example, through personals ads), young persons or adults who exchange sex for gifts or services, prostitution that occurs at sex and swingers' clubs, as well as transvestites or transsexuals working as prostitutes (Rasmussen 2007: 40).

Spanger talks about how Danish authorities and semi-official actors use estimates about the scope of transnational prostitution and human trafficking as if the figures were objective and accurate. By being able to refer to high numbers of victims of human trafficking, argues Spanger, gives the fight against human trafficking a higher political priority. Spanger refers, among others, to the Danish Police Centre for Investigation Support, or NEC (Nationale Efterforskningsstøttecenter), which has called into question the public debate about human trafficking in Denmark. NEC sees a discrepancy between the dominant conception of human trafficking being a major problem in Denmark and the relatively small number of trafficking victims identified by police.

In Finland in the early 1990s, the economic recession and growing unemployment, together with economic restructuring in the former Soviet Union, resulted in an increase of prostitution. The development was accompanied by debates among the Finnish public and decision makers. Marttila's study nevertheless depicts knowledge of the state of Finnish prostitution as extremely limited. All of the information that is available is based on various estimates, and the numbers differ. Broader calculations of the number of persons involved or assessments of the structure of the Finnish prostitution market have not been made. Information from police, social workers and researchers regarding the number of foreigners working in prostitution varies. One figure that has been mentioned is around 50%. The issue continues to be hotly debated. Most of the foreigners come from Russia, the Baltic countries (primarily Estonia), Belarus and Ukraine. There has been no assessment of prostitution on the Åland Islands. While there is said to be no visible street prostitution, there

are women who sell sex on the Åland Islands via Swedish websites.⁵ According to the Swedish Criminal Investigation Department (Rikskriminalpolisen), ferry traffic between Sweden and Finland/Estonia is a route commonly used by traffickers. This route passes through the Åland Islands (Rikskriminalpolisen 2007).

There is no information about organized or visible prostitution on the Faroe Islands. It is assumed, however, that there are women who sell sex in exchange for drugs, for example.⁶ There are also no reports of visible or organized prostitution in Greenland. There are claims, though, that sex is sometimes used as a commodity of exchange, for example, in return for temporary housing.⁷

The last ten years have brought changes to Iceland in prostitution and human trafficking, according to Atlason and Gudmundsdóttir. Within a relatively short time, prostitution has become more visible. Yet there is little information about how widespread it is. According to unpublished results from a 1985 investigation, various forms of prostitution were found to occur in Iceland: prostitution among young drug users, organized prostitution, and prostitution solicited through newspaper personals ads. In 2001, the Ministry of Justice and Ecclesiastical Affairs (Justítíu- og kyrkuministeríet) published a report exploring prostitution and the social environment in which it occurs in Iceland. The report observed that prostitution is often connected strip clubs (Ásgeirsdóttir et al. 2001).

The Nordic countries have seen a growing number of foreign women enter the prostitution market in recent years. Since the millennium shift, both Norway and Finland have experienced an increase in the number of women from Eastern Europe entering the domestic prostitution market. The Norwegian resource centre Pro Sentret times the major shift in the Norwegian prostitution market to 2001. Certainly before then, too, there were many Thai women involved in prostitution, but they worked in indoor prostitution and had little contact with the Norwegian system of support services. In Finland, the number of foreign women working as prostitutes began to climb in the late 1990s (Lehti & Aromaa 2002). Par-

⁵ Interview with Vivan Nikula, head of gender equality affairs for the Åland Government, by Jennie Westlund, March 2008.

⁶ Interview with Elin Reinert Planck, team leader at the women's house Kvinnohuset, Faroe Islands, by Jennie Westlund, June 2008.

⁷ Interview with Jette Eistrup, anthropologist at the health directorate (Sundhedsdirektoratet) in Greenland, by Jennie Westlund, June 2008.

ticularly women from Estonia and Russia established themselves on the Finnish prostitution market. Today, Eastern European women make up a large part of the Finnish prostitution market. The situation has changed in Norway, however. In the last three years, a large number of Nigerian women have been found to be involved in prostitution in Norway. In 2007 they made up 30% of the women with whom social workers had contact in the context of prostitution (Pro Sentret 2008). Another new large group on the Norwegian prostitution market is Bulgarian women. It is estimated that in Denmark approximately 45% of women selling sex are of foreign origin. In Denmark, too, there are women from Eastern Europe and West Africa, but also from South America and Southeast Asia, especially Thailand. The Swedish situation is different. Even though there is transnational prostitution from a number of countries, primarily from Eastern Europe, no large groups of foreign-born women have established themselves in the visible prostitution market, as has happened in Norway, Finland and Denmark.

2.2 Social and judicial remedies

The prostitution markets of different countries have, then, undergone significant changes in the last ten years. But the development has not always been the same in every country. Prostitution and trafficking for sexual exploitation has been high on the public agenda in the Nordic countries, and the question of legal strategies has taken centre stage in debates. Some of the similarity is explained by the fact that some of the Nordic countries have been periodically under the same legislation. Many of the laws in Iceland, for example, came about during the period of Danish rule. At the same time, there is substantial variation in the legislation of the Nordic countries, from Sweden's ban on the purchase of sex to Iceland's prohibition on earning a living through prostitution until as late as 2007. All of them have in effect prohibitions against procurement, but the way that prostitution is defined and what constitutes pimping, or procurement – depending on how the activity is organized and how the procurer benefits from prostituting another person – varies.

With regard to trafficking for sexual purposes, all of the Nordic countries have introduced laws prohibiting trafficking. While preventive measures and work to combat human trafficking are prioritized highly in

each Nordic country, the laws have been formulated somewhat differently. Action plans aimed at preventing trafficking and providing support for victims have already been written and implemented in several countries.

When it comes to social services, they have been first and foremost designed on the basis of knowledge concerning domestic prostitution. Against the background of the growing number of women involved in transnational prostitution, new needs are emerging that require changes in the social and judicial remedies applied by the Nordic countries. With this situation in mind, one of the project's objectives has been to gather relevant and up-to-date information about legislation and social services with regard to prostitution and human trafficking in the Nordic countries.

A host of legislative changes have taken place in the Nordic countries over the last 15 years in legislation aimed at combating prostitution and human trafficking. In Norway, the so-called pandering paragraph has been changed and expanded, and a new law on human trafficking has been instituted. Skilbrei interprets the amendments to the pandering paragraph in the middle of the 1990s in relation to the development of the Norwegian prostitution market. As prostitution changes, legislation catches up.⁸ In 2003, the pandering paragraph was revised in response to the new law on human trafficking. The change meant that today, it only applies to promoting, not exploiting, the prostitution of another person. The paragraph concerning human trafficking instituted in the same year, on the other hand, is directed specifically at those who through violence, threats or abuse of someone who is in a vulnerable situation exploit that person through prostitution, forced labour or other forced service. In her article, Skilbrei sheds light on the debates that preceded the legislation and analyzes the relationship between the two paragraphs. Right now, Norway is about to face another change. Norway will institute a general prohibition to purchase sexual services. The introduction of the prohibition has been preceded by intensive debate within politics and media, and between activists and practitioners in the field, as well as the general public. The ban is aimed at minimizing demand, thereby helping to prevent human trafficking.

⁸ In 1995, leasing locales for prostitution purposes was included in the pandering paragraph in Norway. Further amendments to the paragraph were passed in early 2000, when, among other things, the prohibition against advertising sexual services was instituted.

The debates about the sex purchase ban in Norway have naturally been influenced by the situation in Sweden, where, since January 1999, the purchase of sexual services has been prohibited. The starting point for Swedish prostitution legislation is that prostitution is seen as men's violence against women. The law can be characterized as normative, because its main purpose is to influence the general public's attitudes and beliefs regarding prostitution. In 2006, police received 163 reports of the purchase of sexual services. Of them, 108 led to a conviction (BRÅ 2007). The following year, there were 189 police reports, of which 85 led to a conviction (BRÅ 2008). Since July 2002, Sweden too, like Norway and Denmark, has had a law on human trafficking, which criminalizes trafficking for sexual purposes. Since July 2004, the law also applies to human trafficking within the country's borders as well as human trafficking aimed at other forms of exploitation, such as forced labour or organ trade. The article by Siring sheds light on the Swedish Sex Purchases Act by describing the relationship between the authorities' understanding and use of the law and the objectives that were formulated in the preparatory work before the law's passage. Siring also contrasts the practical application of the law against what it was intended to do. Above all, Siring focuses on the understanding of the authorities of the relationship between male prostitution and the Sex Purchase Law.

With regard to judicial treatment in Denmark, prostitution was decriminalized in 1999. This means that the prohibition against earning a living through prostitution was eliminated.⁹ In 2002, a paragraph on human trafficking was instituted in Danish legislation, which, like its Swedish and Norwegian counterparts, includes human trafficking for both sexual purposes and for the purpose of forced labour or organ trade. Aside from the paragraph on human trafficking, Denmark, like the rest of the Nordic countries, has a law concerning pandering. A political discussion has continued in Denmark for some time about the role of those who pay for sex in prostitution. This newly awakened interest in sex buyers is explained in Spanger's article as connected to the issue of trafficking for sexual exploitation, which has received increased political attention and prioritization in recent years and has changed views about prostitution.

⁹ Decriminalization does not mean that prostitution is viewed as legal activity. Persons who engage in prostitution have no right to unemployment compensation. They are also not eligible for leave of absence or parental leave, early retirement or so-called early retirement pay. It is also unlawful to sell sex while in Denmark on a tourist visa (Holm 2007).

According to Spanger, the growing number of migrants involved in prostitution in Denmark has politicized and professionalized prostitution services, making human trafficking into its own policy area. The attention surrounding trafficking has also reinforced feminist discourse concerning prostitution in the Danish public sphere, writes Spanger. The Faroe Islands and Greenland are subject to Danish law. In other words, in many areas, the same rules apply there as in Denmark. As far as is known, the prostitution and human trafficking legislation has not been applied in Faroe Islands or Greenland, which are also exempt from the obligations that Denmark has through the Palermo Protocol.

In the last ten years, Finland, too, has instituted a number of legislative changes to address prostitution. Finland includes the Åland Islands, which are also governed by the new Finnish laws. At the end of the 1990s, changes made in procurement laws resulted in lighter punishments, so in 2004, “gross procurement” was included in the legislation, prohibiting, among other things, the publishing of advertisements for prostitution. During the same period, the late 1990s, there was especially heated debate in Finland about street prostitution. The debate centred on the issue of public order; street prostitution was seen as a disturbance to other people in public places, and in 1999 the city of Helsinki approved new regulations prohibiting both selling and buying sex in public places. Prostitution became a vigorously debated topic, and in the spring of 2002 the government presented a proposal for amending the law to promote safety in public places. In October 2003, the law on public orderliness was enacted. In accordance with the Government’s proposal, a new proposal was made in 2005 for changes to the criminal code, to make the purchase of sex in general punishable, and discussions surrounding this issue continue to this day.

Prostitution has also been restricted through the Finnish Aliens Act. Since 1999, a citizen of another country can be turned away from Finland if he or she “can justifiably be assumed to be selling sexual services”.¹⁰ The prohibition does not, however, apply to EU citizens or the citizens of countries that, though not EU members, are signatories of the Schengen

¹⁰ A similar ban exists also in Denmark and Sweden, and one has been discussed in Norway, but the issue has been dismissed.

Agreement. According to Pro-tukipiste,¹¹ the law has had major implications for the situation of foreign women involved in prostitution in Finland. Since October 2006, it is also prohibited to purchase sex from a person who is the victim of procurement or trafficking. So far, there have been no legal cases. It is thought that one reason for this is that it may be difficult to prove a buyer was aware of the procurement or trafficking.

Because of its proximity to Russia and Estonia, Finland faced challenges early on about handling transnational prostitution. Marttila's report describes how the sex trade issue has been linked to organized crime and border security, which she sees as an attempt to protect Finnish "welfare borders". According to Marttila, discussions of transnational prostitution as a question of equality and human rights have not been as prevalent as in other Nordic countries.

Iceland's prostitution legislation was amended most recently in 2007, when the prohibition to earn money through "illicit sexual relations" of one's own or through another person was repealed. Atlason and Gudmundsdóttir relate that some people felt that the change in the law could be seen as the legalization of prostitution whereas others pointed out that there is a difference between legalizing prostitution and decriminalizing the sellers. When the prohibition against earning a livelihood through prostitution was eliminated, it was replaced by a new article in the law that prohibits offering sex, acting as an intermediary to provide sex, or making inquiries about sex in exchange for compensation through public advertising. It also became punishable by law to advertise the sale or purchase of sex. In addition, the law contains a prohibition against procurement. Not until 1992 was the term 'prostitution' even incorporated into Icelandic legislation.¹² At that point the law was revised so that the prohibition now applied to the sale of sex as a permanent livelihood strategy, not if it only occurred a few times. Further, the term was made gender neutral, so that where previously it had only concerned "loose women", it was now directed at both men and women who were involved in prostitution.

¹¹ The Pro-tukipiste support centre is a volunteer organization that promotes the civil and human rights of persons involved in prostitution in Finland. The organisation also offers social support and health care.

¹² The Icelandic legislation is, as mentioned, based on Danish legislation, which explains why the concept of prostitution is not used. The Danish penal code continues to define prostitution as sexual indecency.

When it comes to social interventions for prostitution and human trafficking in the Nordic countries, they vary in terms of both content and organization. In their study, Tveit and Skilbrei emphasize the importance of examining how social work is designed, in order to analyze how prostitution is regulated in society. The Norwegian study explores how social work approaches to prostitution can be divided into two main trends, depending on which ideology is utilized: (1) Zero tolerance for prostitution or a view of prostitution as demeaning and damaging, with the aim of helping women and men leave prostitution, and (2) A harm reduction perspective, with the aim of providing support for women and men involved in prostitution, reducing damaging effects, and ensuring the rights of persons working in prostitution.

Since the beginning of the 1980s, Norway has established a number of social and health-oriented measures targeted at women and men in prostitution. Some of the services are managed and financed by the public sector, and some by private and non-profit organisations. Most work with women in street prostitution, but in recent years they have also begun to establish contact with women in indoor prostitution. Today, no field outreach exists for male prostitution. The Norwegian array of social services varies both in terms of ideological standpoint and working methods. For example, Pro Sentret and PION, an organization that advocates for the interests of prostitutes and works primarily in Oslo, emphasize harm reduction and rights. The Church City Mission (Kirkens Bymisjon) in Oslo, on the other hand, works to get women out of prostitution and to offer them opportunities to forge an alternative lifestyle. The difference can also be seen in the ways that the organizations work in the field. While Pro Sentret primarily works through brief field encounters by handing out condoms and lubricant and by providing summarized information, Kirkens Bymisjon aims at more in-depth encounters and dialogue. The differences in working methods between the various organizations' activities, however, look different depending on where in the country one looks, write Tveit and Skilbrei. The authors state that regardless of the ideological differences, in practice, organizations work in relatively similar and complementary ways.

In Sweden, too, there are a number of working methods in prostitution-related social work. In Stockholm, Gothenburg (Göteborg) and Malmö, there are so-called prostitution groups that function within the

framework of municipal programmes. Field visits primarily in street milieu is part of this work, but since some time ago, there is also outreach via the Internet by offering guidance, support and treatment services. Other efforts include preventive work, for example disseminating information to schools etc. Beyond, there is a municipal organization directed at those who buy sex, called KAST. The primary aim is to offer support and occasionally also treatment for those who want to stop buying sex. Apart from the social services offered by urban municipalities, there is also a host of non-profit organizations, such as the Stockholm City Mission (Stadsmissionen), that make visits and offer various forms of support. In addition, there are specially targeted health and medical services in Sweden. For example, the needle exchange programme in Malmö offers services for women who are involved in prostitution and women who have encountered abuse, and there is a health-care office at the prostitution unit in Stockholm. A difference compared with Norway is that the social services that are offered in Sweden are largely directed at getting women and men out of prostitution.

In 2005, the Danish government formulated an action plan to combat prostitution, entitled “A new life” (Et andet liv). In connection with the action plan, a prostitution resource centre (Kompetensecentret Prostitution) was established as a national secretariat at the Social Vulnerability Unit (Udsatteenheden), under the auspices of the National Board of Social Services (Servicestyrelsen). The centre focuses on both preventive and harm reduction measures. In Denmark, social services largely focus on field visits. The aim is to prevent and reduce damages and to offer social support and care services, as well as support the civil and social rights of victims through empowerment (Rasmussen 2007: 116). Further, Reden, the shelter for women who are in prostitution in Copenhagen, offers women who want to leave prostitution behind opportunities for participating in self-help groups. Apart from Reden, several other programmes are available for those who wish to seek help on their own. Social outreach also includes telephone and online counselling. In her study, Bjønness relates how the development of social services in Denmark has been characterized by a particular view of prostitution. In the last 20 years, investigators and researchers have pointed out the shortage of research-based knowledge of the reasons for and the damaging effects of prostitution, in vain, without a resulting prioritization of research. In-

stead, social services continue to be designed on the basis of assumptions about what prostitution arises out of and what its consequences are, asserts Bjønness. In her opinion, the result is that many women who work as prostitutes in Denmark have a hard time recognizing themselves in the descriptions that have been formulated.

In Finland, social services are organized through the organization “Pro-tukipiste”, a Helsinki-based volunteer organization. The organization is also active in Tampere. They offer social support and health services to persons involved in prostitution and make field visits. Since street prostitution has declined significantly in Finland in recent years, the opportunities for carrying out this type of field work are becoming scarcer. Therefore, much of the “face-to-face” work now takes place over the Internet. Pro-tukipiste also runs a programme specially targeting men and trans persons working in prostitution. The organization’s services are primarily aimed at harm reduction. It has no “exit programme”, but offers assistance to those who articulate a desire to leave prostitution. There are also other non-state organizations in Finland that offer social support services. The Multicultural Women’s Resource Centre Monika (Monika-naiset) is targeted at immigrant women who have been subjected to violence. Victim Support Finland (Rikosuhripäivystys), Rape Crisis Centre Tukinainen, and the Federation of Mother and Child Homes and Centres (Ensi- ja turvakotien liitto) also provide help for women who have been victims of violence or work in prostitution.

In Iceland, a review of official documents and action plans reveals a seeming consensus concerning the value and meaning of the social initiatives directed at prostitution and human trafficking. In spite of that, find Atlason and Guðmundsdóttir, there is only one organization that offers specific help to persons involved in prostitution. Stigamot, the “women’s informal grassroots movement”, provides counselling and help to victims of gender-based violence and specifically names persons involved in prostitution as one of their target groups. They offer help to victims to resolve crisis situations and guidance via a special call-in telephone service which is targeted at those groups. During 2007, 22 women and three men called the crisis service (Stigamót 2008). Apart from these services, women involved in prostitution can, to some extent, receive help and support from other organizations, for example, Kvindernes krisecenter, a women’s crisis centre, and at the Konukot women’s shelter. Iceland

passed a prohibition banning human trafficking in 2003, and work on formulating an action plan is underway.

There are no services directed specifically at prostitutes in Greenland or the Faroe Islands. Presumably, this is because awareness about prostitution and trafficking is limited. The Aland Islands offers no services or support measures for persons involved in prostitution.

In Norway, the focus on human trafficking has led, on the one hand, to legislative changes, and on the other hand, to the Norwegian authorities formulating three different action plans in the space of four years to address the issue of human trafficking. While the first one focused solely on the trade in women and children, Authorities in Norway have increasingly begun to pay attention to other forms of trafficking as well. The development has also shifted to take into greater account the rights and needs of victims, whereas in the early stages of anti-trafficking work measures were mostly concerned with punishments and border control. The social service sectors that have traditionally worked with domestic prostitution have largely reorganized their activities in order to serve the needs of foreign-born women working as prostitutes as well as victims of trafficking. Finland is trying to address the problem of transnational prostitution through both the legal system and through other measures. Finland has been grappling with the presence of foreign prostitutes for a long time, and the social interventions directed at prostitution have been accordingly tailored. The first anti-trafficking action plan in Finland was released in 2005. The action plan contains outlines for measures aimed at identifying, helping and protecting victims of human trafficking, prosecuting perpetrators, and preventing trafficking. The work has been carried out by a working group, first headed by the Ministry of Labour and later by the Ministry of the Interior, which brought out a more detailed action plan in the spring of 2008. In Denmark, too, the growing number of foreign women working in prostitution has influenced and characterized the prostitution debate and has led, within a brief period of time, to the formulation of two action plans to combat human trafficking as well as to the passage of a prohibition banning human trafficking. In her article, Spanger talks about how trafficking has emerged as a policy area and how this change has affected the various players in the field of prostitution. In Sweden, trafficking for sexual exploitation debate has spurred legislative changes. As previously mentioned, trafficking for sexual pur-

poses was established as a crime in Sweden in 2002, and in 2004, the sentencing scope in the trafficking statute was extended to also include trafficking that does not involve border crossing and may also consist of other forms of exploitation, for example, forced labour and organ trade. In July 2008, the Swedish Government presented their first action plan for prostitution and trafficking for sexual exploitation. In it, the Government offered a proposal for combating prostitution and human trafficking for sexual purposes and for providing victims with better protection and support. The action plan also includes measures for improving prevention as well as the quality and effectiveness of the judicial system's response, and measures for increasing cooperation and knowledge.

2.3 Attitudes and beliefs

The third objective of the project was to map out and analyze attitudes and beliefs about prostitution and trafficking for sexual exploitation among men and women in the Nordic countries. It is always challenging to study attitudes, especially when it comes to difficult and emotional issues. The risk of bias runs high. Different countries have implemented the task in different ways, based on, among other things, the kind of information that has been available. In Sweden, with the support of additional national financing, a survey was conducted with the aim of studying attitudes and opinions about the Sex Purchases Act as well as respondents' experiences with purchasing and selling sex. With the exception of the Swedish study, other researchers involved in the project have not had the opportunities or resources to carry out their own attitudinal surveys. Instead, they have gathered empirical materials primarily through qualitative studies.

Consequently, the question of attitudes and outlook has been studied and analyzed on several levels. While some studies concentrate on discourses about prostitution, others focus on characterizing and analyzing the results of studies on attitudes about prostitution and prostitution policy. In a Norwegian study, Synnøve Jahnsen studies the ways in which the Norwegian media covered the issue of criminalizing sex buyers in Norway between 2006 and 2007. Above all, Jahnsen highlights the arguments that have received most visibility in the debate. The media debate is shown, on the one hand, as embracing the same starting point, i.e. that

prostitution is a social problem that is best dealt with through socio-political measures. On the other hand, Jahnsen finds that during the period in question, the Norwegian media was reporting on the changes that had taken place in the Norwegian prostitution market, indicating that it was now necessary to deal with the issue in a new way. The Norwegian prostitution market was described as scattered and diffused, and was said to disturb the public. The situation was characterized as uncontrollable and as a problem of public order. The analysis shows that the arguments for and against criminalizing sex buyers is not framed by way of an equality discourse, as it has been in Sweden. Instead, the understanding of the situation in Norway is expressed in different terms, for example that prostitution is a problem of public order or a problem that requires protecting Norway from international, organized crime.

Further, Jahnsen examines the discussions that take place on the debate forum www.sexhandel.no, a website launched in January 2006 by the Ministry of Children and Equality in Norway. The page contains information about prostitution and human trafficking as well as an interactive forum, where site visitors can discuss various perspectives on the sex trade. The webpage is aimed at the public, but particularly at men who buy sex and at potential buyers. An overall goal of the effort is to minimize the market for sexual services. The majority of contributions on the forum are from sex buyers. The aim of Jahnsen's study has been to investigate the ways in which men, who have had the experience of buying sex, explain their purchase of sexual services. In this context too, Jahnsen interprets the opinions expressed on the forum in light of discussions about gender, commercialism and sexuality. In analyzing her materials Jahnsen shows that despite the fact that the sex buyers who write on the forum emphasize that the individuals from whom they purchase sex are rational, active market participants and equal to the men themselves, they nevertheless also emphasize that money for sex is not something that would be an acceptable, rational choice for someone to whom they are close. In that sense, maintains Jahnsen, they replicate general, social values about prostitution as something undesirable. According to Jahnsen, the challenge for those who maintain the website lies in the fact that some of the forum participants with experiences of purchasing sex view the problematic sides of prostitution, such as violence, force, exploitation and trafficking, as issues that have to do with "the others", but not themselves.

In the Swedish study, Jari Kuosmanen illuminates attitudes and opinions about the Sex Purchases Act and potential experiences of prostitution. Kuosmanen compares the results from his investigation to studies on the same theme carried out between 1999 and 2002. He claims that the three most recent studies, from 1999, 2002 and 2008, point in the same direction when it comes to support for the criminalization of purchasing sex, remaining at the same relatively high level since 1999. In 2008, 71% of respondents stated that they wanted to keep the Sex Purchases Act on the books. Of men, 60% wanted to keep the law and of women, 79% agreed. The results from Kuosmanen's study indicate simultaneously, however, that the Swedish public has very little faith that the law has had an effect on the scope of prostitution. Only one fifth of respondents thought, for example, that the number of sex buyers has declined. It is also interesting that when it comes to the criminalization of the sellers, women above all (66%) were not satisfied with just criminalizing the buyer, even though the buyers are mostly men. Kuosmanen suggests that this indicates that most respondents view prostitution as a general problem, and not first and foremost as a manifestation of unequal gender relations. The study also examined people's experiences of buying and selling sex. The aim was to examine whether the Sex Purchases Act has had any impact on the prevalence of such experiences in Sweden. The results show that the proportion of men who report experiences of buying sex has diminished since the last study examining this question in 1996 (Månsson 1998), three years before the passage of the Sex Purchases Act. In the 1996 study, 13.6% respondents reported having experiences with the purchase of sex. In Kuosmanen's 2008 study, 8% reported paying for sex at some point. An absolute majority, 88% of men and 99% of women claimed never to have paid for, fantasized about or planned to have paid sex. The study by Annelie Siring on conceptions about legislation among social workers and the police reveals that gender equality arguments are not always in the foreground. Interviews with police revealed that it was considered problematic for men that the law was "owned by the women's movement", risking that the law could be seen as irrelevant. According to Siring, this means that the police indeed "understand" that legislation is a question of equality, but they believe that the law loses legitimacy from the emphasis. In interviews, the police respondents formulated humanistic arguments, which Siring sees as a way of downplaying the gender equal-

ity ideology. When it comes to application of the law, on the other hand, it seems that the reasoning used by police and social workers is to some extent consistent with the argumentation used for instituting the law; namely, to deter and to exercise control in order to prevent people (groups) from establishing businesses in the Swedish prostitution market. For example, social workers expressed ideas such as, foreign women who work as prostitutes in the other Nordic countries avoid Sweden because of the Sex Purchases Act. Among police officers, too, there was an assumption that the Sex Purchases Act keeps foreign pimps away. Both police and social workers also thought that the Sex Purchases Act could be used as a method to boost border control. At the same time, Siring found that police considered the prostitution of foreign women more worrisome than that of Swedish women, using reasoning related to voluntary versus forced prostitution. Siring's study also highlights clear differences in how respondents view male prostitution compared to heterosexual prostitution.

In the Danish study examining perspectives on prostitution Bjønness relates how the public debate about prostitution has in recent years been dominated by discussions about laws. Before 1999, the focus was more on decriminalizing prostitution, and thereafter the question of criminalizing the purchase of sex has been debated increasingly. According to Bjønness, there are two main actors in the field of prostitution, the National Board of Social Services (*Servicestyrelsen*) and *Reden*, which, by producing information about the issue have had substantial influence in the debate. For example, the expertise and viewpoints of these actors are often referenced in media reports on the issue. In reviewing the argumentation utilized by political parties for or against criminalizing the purchase of sex, Bjønness found that those who are positively inclined emphasize the growing prevalence of prostitution in Denmark. Arguments for criminalization are supported by making references to Sweden, by arguing that there has been a decline in prostitution there as a result of the law. The argumentation is based on an interpretation of prostitution as men's violence against women and as a gender equality problem. The parties that oppose criminalizing the purchase of sex do not have as clear and concise a basis for their argumentation. Instead, says Bjønness, these parties appear to exhibit a more general idea of supporting those who are weakest and boosting policing. Consequently, they do not offer concrete proposals for making changes in social or judicial actions. In terms of attitudes

toward prostitution among Danes, a study on attitudes conducted in 2002 (Lautrup 2002) shows wide acceptance of prostitution among the Danish population. Approximately eight in ten male respondents and about half of female respondents viewed prostitution as an acceptable or somewhat acceptable social phenomenon (Lautrup 2002: 75). In the same study, almost as many respondents also reported that they considered prostitution a social problem that can be psychologically and physically damaging. The majority of respondents believed that society should limit prostitution through social measures and legislation. According to Bjønness, this means that people's views regarding prostitution are ambiguous and contradictory. This ambiguity is often depicted as a recurring theme in Danish perspectives on prostitution (Järvinen 1990, Rasmussen 2007, Bjønness 2008). In her article on attitudes toward prostitution, Bjønness wants to show that politicians' attitudes are not necessarily in tune with the population as a whole. Against the background of this discrepancy, influential actors in the prostitution arena have initiated campaigns aimed at changing the public's views on the subject and place the work combating human trafficking and criminalizing the purchase of sex on their agenda. These campaigns appear to have succeeded, as indicated in the Danish daily *Politiken*, which published the results from a 2006 study on attitudes that showed that the proportion of people who viewed prostitution as an unacceptable social phenomenon has increased from 25% to 42%.¹³

In a Finnish study, Anne-Maria Marttila discusses and analyzes the criminalization debate in Finland. As background for her analysis she presents a survey of findings from previous studies on attitudes toward prostitution. Knowledge of attitudes among Finns toward prostitution proves to be rather limited. The studies that have broached the issue (including Haavio-Mannila et al. 2001; Gender Equality Barometer 2004 & 2008) show that the attitudes of women and men toward the purchase of sex, and the buyers and the sellers, differ. In the 2008 gender Equality Barometer 59% of men and 32% of women reported that they found it acceptable for men to pay for sex. In connection with proposals for legislative changes in the late 1990s and early 2000s, a lively debate surrounding criminalization emerged. In Marttila's article criminalization is ana-

¹³ The study was conducted by Synovate Vilstrup 26.12.2006 and was based on nearly 1,200 respondents.

lyzed from a gender equality perspective, including both gender and social equality. Marttila shows that equality between the genders is a recurring theme in the Finnish debate about criminalizing the purchase of sex. In her analysis of the debate, Marttila found several views of equality in the context of prostitution and has extracted two main trends in the debate. On the one hand, she sees a gender equality viewpoint and focus that emphasize collectivization, which in the debate was primarily found among supporters of criminalization. From this perspective, societal, and structural inequality explain prostitution. Society's task thereby becomes to regulate and combat this inequality through legislation. On the other hand, opponents of criminalization formulate a liberal conception of equality, which emphasizes basic individual rights to exercise the freedom of trade or to actualize one's sexuality, also within the framework of paid sex.

In Iceland, there have been a number of recent studies examining attitudes toward prostitution and strip clubs. The majority of people thought that there is prostitution at strip clubs and that strip club activity should be curtailed. The responses showed differences in terms of gender and age. Women were more likely to want to see this type of activity restricted. Similarly, older people were more likely than young respondents to want such activity limited (Capacent-Gallup 1999). Results from a study carried out by the Center for Women's and Gender Studies at the University of Iceland (2003) showed that the majority of the Icelandic population thinks that the purchase of sex should be illegal; 60% of men and 69% of women supported this view. With regard to the question of whether it should be legal to support oneself by engaging in prostitution, 67% of men and 92% of women thought that it should be legal in Iceland. In March 2007, results were published from a telephone survey on attitudes toward the criminalization of purchasing sex. The results show that 70% of respondents felt that paying for sex should be punishable by law (Gallup: Sexkøb burde være strafbart [Paying for sex should be punishable] 2007). Of women, 83% and of men, 53% thought that purchasing sex should be punishable. A comparison with 2003 results shows that the proportion of men who were positively inclined toward criminalizing the purchase of sex remained the same in 2007, while the proportion of women who supported criminalization had increased. At the discourse level in Iceland, the women's movement has influenced the view of pros-

titution as gender-related violence. This formulation can also be found in official documents, report Atlason and Gudmundsdóttir, but the perspective has not begun to inform government legislation until recently.

Prostitution and human trafficking have gained little attention in Faroe Islands and Greenland, and, as mentioned previously, to our knowledge, there have been no court cases as of yet. It also appears that no studies on attitudes have been conducted, nor have there been political discussions that reflect attitudes toward prostitution. In the Aland Islands, where prostitution has begun to be discussed somewhat, as the focus has been on prostitution and human trafficking suspected to occur in connection with the ferry traffic that passes through the Aland Islands.

3. Discussion

3.1 Prostitution as a social problem

While the Nordic countries have developed solid cooperation surrounding the issue of human trafficking,¹⁴ ¹⁵ prostitution continues to be a more controversial subject. The Nordic countries define prostitution as a social problem that should be addressed first and foremost through social work. There are of course differences in the way in which prostitution is construed as a social problem and in the methods that are considered adequate for dealing with it. In the following we will discuss the processes through which prostitution is construed as a social problem and the solutions to the problem that are discussed in the Nordic countries.

The way in which prostitution is being addressed today is based on knowledge produced through research and social work. Already in the beginning of the 1980s, a critical social research perspective emerged in the Nordic countries, also receiving international attention. In Sweden, the focus shifted to the underlying factors behind prostitution. Particular attention was given to an understanding of prostitution as an expression of gender inequality (Månsson 1981). Studies were conducted also of the men who purchase sex (Månsson & Linders 1984). In Norway, the often functionalist explanations of prostitution, i.e. that prostitution exists because the sexuality of men and women is different, began to be criticized.

¹⁴ Among other things, through the Nordic-Baltic information campaign initiated in 2001 to increase awareness about human trafficking. Nordic and Baltic Ministers for Gender Equality and Justice took part in this work, which received support from the Nordic Council of Ministers. For more information about the campaign, see the final report (Nordic Council of Ministers 2004).

¹⁵ In 2002, a Nordic-Baltic Task Force against Trafficking was appointed by the Nordic and Baltic Ministers for Foreign Affairs. The task-force initiated a three-year pilot project to work with protection and safe return for victims of trafficking. The project was concluded in 2008. See: www.nordicbaltic-assistwomen.net.

The moralistic judgment of women who sold sex was called into question. Instead, focus was now on attempting to understand why people began to practice prostitution in the first place – as a result of personal problems, social inequality and drug use (Høigård & Finstad 1986). In Finland, too, prostitution was linked to conceptions of gender, power and social inequality. Margareta Järvinen (1990) carried out a study about the control measures imposed on women in prostitution in Helsinki in the period 1945–1986, characterizing them as a way to control women. In Denmark, prostitution research has not had the same central role as in Norway and Sweden, and the contributions that have been produced have emphasized prostitution as a social problem (Bechmann Jensen et al. 1990).

In other words, prostitution research is characterized by viewing the issue as a gender equality issue and a social problem. The Nordic research trend has emerged out of and in collaboration with the field of social work, which has meant that social work dealing with prostitution has had a significant impact on the development of knowledge resources. Many of the most important Nordic research contributions have as their starting point problems that were identified through the practice of social work. In recent years also many social service providers have been assigned the task of continually producing knowledge concerning prostitution, for example the Swedish National Board of Health and Welfare (Socialstyrelsen), which is charged with ongoing monitoring and data gathering of the scope and development of prostitution, as well as of the social initiatives carried out at the local level. Another example is Norway's Pro Sentret, which was appointed as the country's national resource centre in 1993.

As a result, prostitution research, together with experiences from the field of social work, forms an important source of the knowledge that is available. The fact that this knowledge is so intimately connected to the field of related social work means in principle that we have knowledge of the groups that are the targets of social work, either through face-to-face outreach or through prostitutes themselves voluntarily seeking society's help and support. This applies particularly to women in street prostitution. There is significantly less knowledge about women and men engaged in the less visible forms of prostitution, for example transacted via the Internet or in indoor locales such as brothels and massage parlours. These

aspects influence the way in which prostitution is perceived as a social problem and the way that the Nordic countries formulate their policies in response.

We have shown that prostitution in the Nordic countries is both construed as a question of gender inequality and increasingly as an issue of global injustice. While Nordic prostitution research in the 1980s used gender as the starting point for analysis, today's Nordic prostitution research is mainly concerned with transnational prostitution. Gender remains an important part of the explanation, but other structural inequalities are considered just as significant. Especially in Norway and Denmark, the growing number of foreign-born women involved in prostitution is reflected onto the development of knowledge. A host of research projects have been carried out to examine transnational prostitution and its various actors (Spanger 2002; Skilbrei & Polyakova 2006; Skilbrei et al. 2006; Holm 2007).

How knowledge is created, by whom and with what methods is highly relevant. An important task for the knowledge-producing social service providers has been to count the number of persons involved in prostitution so that they can evaluate the scope of prostitution and identify the specific characteristics of the actors and their background, be it drug abuse or poverty in the country of origin. This is how a binary distinction is produced between "normal" (persons who do not sell or buy sex) and "abnormal" (persons who sell and buy sex). This is also how normative boundaries are constructed. By researching the ways in which prostitution is construed as a social problem we also render visible the fact that people in this field are defined as part of the social problem.

As a result of increased focus on transnational prostitution in the Nordic countries – not only in research but also in politics and the media – finding solutions to the prostitution questions has become topical. As mentioned earlier, major legal changes have taken place in the Nordic countries over the last ten years. Procurement legislation has been amended in several countries. In Denmark and Iceland the sale of sex as a trade has been decriminalized. Two countries have criminalized the purchase of sex, via a general prohibition in Sweden and a partial prohibition in Finland. All of the Nordic countries have banned human trafficking. These developments can be understood as important ways of newly and increasingly criminalizing prostitution, meaning that judicial approaches

to prostitution have been given a higher priority than previously. To a certain extent, this development is connected to the international agreements by which the Nordic countries are bound. The opportunity of states today to solve problems using procedures of their own is limited by international conventions. This can be viewed through the concept of “juridification” (Habermas 1984), a concept that is in part about getting politicians to commit to international obligations, and in part has to do with the fact that addressing social problems through the justice system has increased. That countries’ freedom to act in accordance with their own procedures is curtailed can result in a situation where national priorities and perspectives become obscured. An example of this is the first Swedish human trafficking paragraph, which originally only banned human trafficking for sexual purposes. It was reformulated to also include other forms of exploitation.¹⁶ To place sexual exploitation together with other forms of exploitation has been criticized for undermining the Swedish perspective on prostitution as a form of violence. When trafficking for sexual exploitation is equated with other forms of human trafficking, such as forced labour or organ trade, what is specific about prostitution is lost.

International conventions underscore the importance of enacting special legislation against human trafficking and granting rights guaranteed by law to victims of trafficking. This is, however, not the sole explanation for why the field of prostitution is increasingly regulated by more and more detailed laws and regulations. Also national and Nordic processes have been significant in this development, as have the changes that have taken place in the prostitution market, and a growing focus on the demand side of the market. By focusing on demand, societies have concerned themselves with the norm-giving function of laws in terms of potential prostitution clients. This formed, for example, an important foundation for the reasoning and argumentation for the enactment of the Sex Purchases Act in Sweden. In Norway, the focus in discussions about instituting a ban on the purchase of sex has been on whether such a ban would be helpful to police in combating human trafficking at a practical level.

Through changes in prostitution legislation and the application of local regulations as well as national migration legislation, prostitution is managed more and more through various control measures. This can be viewed as a major change in relation to the focus on social work of the

¹⁶ Proposition 2003/04:111: Expanded criminal responsibility for human trafficking.

last 30 years. The social interventions were pioneering in their time and they brought an increased focus on the problems that women and men who practice prostitution experience, both before they begin to practice it and as a consequence of it. Today's shifting focus and new measures aim at reducing prostitution. At the same time, there is a risk of unintentionally changing the prostitution market and the daily reality of those involved in it in a negative way. Changes to the pandering legislation in Norway can be viewed as an example of this kind of development. In the mid-1990s there was unease about growing indoor prostitution taking place in massage parlours (Skilbrei 2001). To address the situation, a host of laws and regulations were applied, including the aliens law as well as health directives. At the same time, also the leasing of spaces used for prostitution purposes became a crime. With the help of these laws, prostitution was reduced markedly. In subsequent years, indoor prostitution has neither been as visible or organized. Instead, women now work on their own in dwellings, with the result that they are less protected from violence. An increase in street prostitution has also been observed. Now, street prostitution is characterized as the biggest problem, and there is reason to assume that this development is in part in response to the increased police and judicial interventions in indoor prostitution (*ibid.*).

A possible consequence of the juridification of a particular area is that the actual problem becomes increasingly a judicial problem, as more and more of the problem is regulated through laws. Redefining the phenomenon into a legal challenge risks eroding the role of social measures and thus reducing what used to be an important feature of the Nordic countries.

An insistence on seeing prostitution as a social construction favours one definition of the phenomenon over others. The chosen interpretation and handling of the issue then becomes the accepted version, even in the face of contradictory information. Men are not included in the category of prostitution, because prostitution is seen as a heterosexual practice founded on gender inequality. Politicians and others will hear time and again that indoor prostitution is at least as important an arena as street prostitution. At the same time, it is largely precisely the streets that one turns to when looking for information about prostitution; estimates are based on street prostitution and it functions as the starting point when designing social interventions to address prostitution. Because prostitu-

tion is construed as a social problem, certain professions and groups are thereby unintentionally given a greater role in defining the issue.

The two developmental trends described here – that prostitution as a social problem is addressed through both social interventions and various prohibitions – can be seen as contradictory. The relationship between prohibitions and social responses is continually discussed, and in forming social responses we must evaluate how well they function in connection with the various prohibitions. When new laws are enacted, we must evaluate their impact on the ability of social work to carry out the tasks assigned to it. In Norway and Denmark social interventions have largely been devised to focus on minimizing harmful effects. Society's offer of support and help has not consisted of trying to help women and men out of prostitution, and instead society has settled on harm reduction. In Sweden, social interventions have largely been directed at fighting prostitution and getting women and men to leave "the life". Even though this may appear like a contradictory way of encroaching on people's lives, the question of the relationship between control (legislation) and care (social work) is more complicated (Jansdotter & Svanström 2007; Skilbrei & Renland 2008). Care-provision through social interventions also contains a form of disciplining; there is a preference that clients should change. At the same time, prostitution legislation is often framed not just as controlling, but also as caring; laws on pimping and human trafficking aim to protect women and men in prostitution against exploitation, and the criminalization of the purchase of sex aims at promoting equality. The motive behind the social interventions appears therefore to not just be connected to the idea of caring, much like legislation and police interventions are not exclusively about control. Hence, the juridification of prostitution does not necessarily imply that the focus on prostitution as a social problem is changing.

3.2 Conclusion

To demonstrate how current understandings are shaped and the consequences that this can have is an important task in social research. In the research project "Prostitution in the Nordic countries" our ambition has been to describe the ways in which prostitution and its participants have been understood and addressed in different periods and contexts. We have

also attempted to uncover underlying and broadly held assumptions about the phenomenon.

The Nordic countries have a lot in common, economically, culturally and socially. At the same time, states Swedish social scientist Christina Bergqvist (1999), there is the risk that presumed similarities overshadow possible differences. In this project we wanted to offer detailed descriptions of the ways in which the Nordic countries have approached the prostitution question. We have paid special attention to areas where the countries seem to differ. The articles reveal large similarities as well as major differences in how prostitution is interpreted and addressed. The studies also show that prostitution is defined, construed and handled differently in different times and contexts. This indicates that even within one country, the definition never remains constant. Even though it is important to distinguish between the different ways that the Nordic countries have of defining prostitution as a social problem, the differences between the Nordic countries and other parts of the world in defining prostitution are much greater than any differences between the Nordic countries themselves.

Sources

- Ásgeirsdóttir, Bryndís Björk et al. (2001): *Vændi á Íslandi og félagslegt umhverfi þess: Áfangaskýrsla (Prostitution in Iceland and the social milieu: Country report)*. Reykjavík: Rannsóknir og greining ehf og Dómsmálaráðuneytið (Reykjavik: Research and analysis: Department of Justice and Ecclesiastical Affairs)
- Bechmann Jensen, Torben et al. (1990): *Prostitution i Danmark* [Prostitution in Denmark]. Copenhagen: The Danish National Centre for Social Research
- Bergqvist, Christina (1999): "Norden – en modell eller flera?" [The Nordic countries – one model, or many?] In: *Likestilte demokratier? Kjønn og politikk in de Nordiska länderna*. Christina Bergqvist (ed.). Oslo: Universitetsforlaget and the Nordic Council of Ministers
- Bjønness, Jeanett (2008): "Vil du have et andet liv?" [Do you want a different kind of life?] In: *Købt eller solgt*. Birgitte Graakjær Hjort (ed.). Århus: Klim
- BRÅ (2007): *Kriminalstatistik 2006*, Report 2007: 20. [Crime statistics] Stockholm: National Council for Crime Prevention
- BRÅ (2008): *Kriminalstatistik 2007*, Report 2008: 17. [Crime statistics] Stockholm: National Council for Crime Prevention
- Capacent-Gallup (1999): *Gallups nationella opinionsundersökning: Afstaða til nektarstaða (Hållningar till strippklubbar)*. [National opinion survey on strip clubs]

- URL: <http://gallup.is/?PageID=762&NewsID=480> [Retrieved 23.07.2008]
- Gallup: *Vændiskaup skyldu vera refsiverð* [Paying for sex should be punishable] (2007): RÚV (Icelandic Radio).
- ULR: <http://www.ruv.is/heim/frettir/frett/prenta/store64/item149150> [Retrieved 23.07.2008]
- Habermas, Jürgen (1984): *The Theory of Communicative Action Vol. 2*. London: Heinemann
- Holm, Maibrit (2007): "Mellem migrant og sexarbejder: Nigerianske kvinder i prostitution i Danmark." [Between migrant and sex worker: Nigerian women in prostitution in Denmark] In: *Sosiologi i dag*, vol. 37 (3–4): 31–57
- Høigård, Cecilie & Finstad, Liv (1986): *Bakgater – Om prostitusjon, penger og kjærlighet*. Oslo: Pax forlag
- Haavio-Mannila, Elina et al. (2001): *Trends in Sexual Life. Measured by national sex surveys in Finland in 1971, 1992 and 1999, and a comparison to a sex survey in St. Petersburg in 1996*. Working Papers E 10/2001. Helsinki. Väestöliitto – The Family Federation of Finland
- Jansdotter, Anna & Svanström, Yvonne (2007): "Inledning" In: *Sedligt, renligt, lagligt. Prostitution i de Nordiska länderna 1880–1940*. [Prostitution in the Nordic countries in 1880–1940] Jansdotter, Anna & Svanström, Yvonne (ed.). Gothenburg and Stockholm: Makadam
- Gender Equality Barometer 2004*. Helsinki: Ministry of Social Affairs and Health publications 2004: 20
- Gender Equality Barometer 2008*. Helsinki: Ministry of Social Affairs and Health, unpublished
- Järvinen, Margaretha (1990): *Prostitution i Helsinki – en studie i kvinnokontroll*. [Prostitution in Helsinki – a study of the control of women] Åbo: Åbo Akademis Förlag
- Lautrup, Claus (2002): *Unge i prostitution og lovgivning. Evaluering af straffelovens §223a*. [Young persons involved in prostitution and the law. Evaluation of penal code paragraph §223a] Copenhagen: PRO-centret
- Lehti, Martti & Aromaa, Kauko (2002): *Trafficking in Human Beings, Illegal Immigration and Finland*, Helsinki: HEUNI Publication Series No. 38
- Månsson, Sven-Axel & Linders, Annulla (1984): *Sexualitet utan ansikte – könsköparna*. [Sexuality without a face – buyers of sex] Stockholm: Carlsson & Jönsson
- Månsson, Sven-Axel (1981): *Könshandels främjare och profitörer- om förhållandet mellan hallick och prostituerad*. [Promoters and profiteers of the sex trade – the relationship between pimps and prostitutes] Lund: Doxa
- Månsson, Sven-Axel (1998): "Den köpta sexualiteten." In: *Sex i Sverige – om sexuallivet i Sverige 1996*. [Bought sexuality] Bo Lewin (ed.). Stockholm: Swedish national Institute of Public Health
- Nordic Council of Ministers (2002): *Nordic Baltic Campaign Against Trafficking in Women, Final report 2002*, ANP 2004:715. Copenhagen: Nordic Council of Ministers
- Pedersen, Merete (2007): "Den problematiske prostitution legislationen och den usedliga osedlighetspolisen in Danmark 1870–1906." [Problematic prostitution legislation in Denmark] In: *Sedligt, renligt, lagligt. Prostitution i de Nordiska länderna 1880–1940*. Jansdotter, Anna & Svanström, Yvonne (eds.). Gothenburg and Stockholm: Makadam
- Pro Sentret (2008): *Året 2007*. Oslo: City of Oslo
- Rannsóknastofa í kvenna- og kynjafræðum (Center för kvinno- och könsforskning) (2003): *Jafnréttismál – viðhorfsrannsókn* [Gender equality

- questions – a study on attitudes].
Reykjavík: IMG-Gallup
- Rasmussen, Nell (2007): *Prostitution in Denmark*. Copenhagen: The National Board of Social Services, Ministry of Social Welfare
- Regerings proposition 2003/04:111 *Ett utvidgat straffansvar för människohandel*. [Swedish Government's proposal for expanded criminal responsibility for human trafficking] Stockholm: Swedish Government
- Rikskriminalpolisen (2007): *Människohandel för sexuella och andra ändamål, Lägesreport 9, 1 Jan–31 Dec 2006*. [Human trafficking for sexual and other purposes] Stockholm: Criminal Investigation Department, RKP KUT Report 2007:6
- Skilbrei, May-Len & Polyakova, Irina (2006): "My life is too short; I want to live now": *Kvinner fra Øst-Europa forteller om veien til og livet i prostitusjon i Norge*. Oslo: Department of Criminology and Sociology of Law, University of Oslo
- Skilbrei, May-Len & Renland, Astrid (2008): "Å tolerere eller ikke å tolerere, det er spørsmålet: Forholdet mellom lovgivning og sosialt arbeid på prostitusjonsfeltet." In: *Tidsskrift for velferdsforskning*, vol. 11 (3): 166–178
- Skilbrei, May-Len (2001): "The Rise and Fall of the Norwegian Massage Parlours: Changes in the Norwegian Prostitution Setting in the 1990s." In: *Feminist Review*, vol. 1 (67): 63–77
- Skilbrei, May-Len (2003): "Nordic prostitution control: Far away, so close." In: *Prostitution Control and Globalisation*. Oslo: Pro Sentret
- Skilbrei, M-L, Tveit, M & Brunovskis, A (2006): *Afrikanske drømmer på europeiske gater. Nigerianske kvinner i prostitusjon i Norge*. Oslo: Fafo
- Socialministeriet (2007): *Prostitusjons omfang og former*. Copenhagen: The National Board of Social Services, Ministry of Social Welfare. URL: www.vfcudsatte.dk/page757.asp [Retrieved 02.09.2008]
- Spanger, Marlene (2002): "Black prostitutes in Denmark." In: *Transnational Prostitution. Changing Global Patterns*. Thorbek, Susanne & Pattanaik, Bandana (eds.). London: Zed Books
- Stígamót (2008): *Ársskýrsla Stígamóta 2007* (Stígamót's annual report 2007). Reykjavík