

Policy Paper

THE EUROPEAN MODEL

GUARANTEERING THE HUMAN RIGHTS OF SEX WORKERS IN THE EU

Authors: Esther Braun, Abha Calindi, Julia
Furtado de Barros, Ebba Mark, Francesco Nasi,
Doris Kristina Raave, Rohan Stevenson.

September 2025



Summary

The European Union (EU) is founded on values such as human dignity, freedom, equality, and respect for human rights. Yet, when it comes to sex workers, the EU fails to uphold these values. Sex workers across member states face discrimination, stigma and violence. Existing policies, such as criminalisation, the 'Nordic Model' and restrictive regulation, contribute to these harms.

This report proposes an evidence-driven alternative: a labour and human rights-based **European Model** built on three pillars. First, the **decriminalisation of sex work**. Second, the **recognition of sex work as work**. Third, the implementation of additional measures that **guarantee sex workers' rights**, supported by EU funding.

Table of Contents

Introduction	4
1. Context and State of Play: The Situation of Sex Workers in the EU	6
1.1: Sex Workers Face Discrimination, Stigma, and Violence	6
1.2: Existing Regulatory Approaches Harm Sex Workers	6
2. Recommendations: The ‘European Model’ - A Human and Labour Rights-Based Approach	11
2.1: Decriminalisation	11
2.2: Recognising Sex Work as Work	13
2.3: Complementary Measures to Guarantee Sex Workers’ Rights	14
2.4: Broader Impact of the European Model	15
2.4.1: Efficiently Tackling Human Trafficking	15
2.4.2: Economic Benefits	16
3. Conclusions: An Opportunity for EU Leadership	18
3.1: European Engagement Thus Far	18
3.2: Towards the European Model: The EU’s Next Steps	19
Glossary	21
References	22
Acknowledgements	30

Introduction

The European Union (EU) is **founded on fundamental values**, such as respect for human dignity, freedom, equality, and human rights, including those of minority groups (TEU, 2012). When it comes to sex workers, **the EU fails to uphold these values**. Across the EU, sex workers face **stigma, discrimination and violence**, as well as systemic barriers to justice, healthcare and social and labour protections (Amnesty International, 2024; European Parliament, 2023a; Oliveira et al., 2023).

DEFINITION OF SEX WORK

We use the term 'sex work' to refer to the **consensual exchange of sexual services or erotic content for money or goods between adults**. This includes a wide range of practices and settings, from street-based work and brothels to escorting, pornography and online platforms (ICRSE, 2021; Stutz et al., 2024). The term 'sex work' emphasises the **agency and labour rights** of the individual providing the service.

Existing regulatory approaches to sex work within EU member states **have failed** to improve sex workers' **working conditions, wellbeing, and quality of life** (see European Parliament, 2023; Konečná, 2024b; Oliveira et al., 2023). Some EU countries criminalise sex work outright; in others, buying and selling sexual services is legal but subject to restrictive regulations (European Parliamentary Research Service, 2024). Recently, the '**Nordic Model**' has received increasing attention. First adopted in Sweden in 1999, this approach criminalises buyers of sex work but not sex workers themselves, viewing them instead as 'victims' or survivors of exploitation (Johnson & Matthews, 2016). It aims to reduce demand for sex work. However, the experiences of sex workers in countries that have implemented the Nordic model suggest this approach has **negative consequences** - driving sex work underground, making working conditions more dangerous and **undermining sex workers' human rights** (see Burba, 2021; Jordan, 2012; Voulajärvi, 2022) (see Part 1.2).

Sex work regulation affects a **significant number of people** across the EU. Obtaining accurate, pan-European data is extremely difficult due to stigma, partial criminalisation, and the informal nature of much sex work. Many sex workers operate in unregistered settings, making them invisible to official statistics. However, available estimates suggest there are between 700,000 and 1,250,000 sex workers in the EU (Azair & Nezhyvenko, 2017).

In line with the recommendations of **sex workers' rights organisations** such as NSWP (2020) and **international human rights organisations** such as Amnesty International (2023), Human Rights Watch (2019), Human Rights Campaign (2019) and UNAIDS (n.d.), we propose an alternative, **human and labour rights-based model** for regulating sex work: the **European Model**.

This European Model is informed by expert interviews, a review of academic literature, and reports from NGOs and sex workers' advocacy groups. It addresses the **systemic challenges** faced by sex workers and aligns with broader EU objectives to **reduce discrimination**, combat **gender-based violence** (Directive 2024/1385/EU; CoE, 2011), and **counter human trafficking** (Directive 2024/1712/EU; Directive 2011/36/EU).

Human trafficking, as defined in EU law (Directive 2024/1712/EU; Directive 2011/36/EU) and the United Nations Palermo Protocol (2000), refers to the coercive or deceptive recruitment, transport or receipt of individuals for exploitation. Although human trafficking is a problem within the sex industry, it also occurs in other settings, such as domestic service, agriculture, construction, and factory work. **Conflating sex work and human trafficking undermines effective anti-trafficking efforts and sex workers' human rights** (Konečná, 2024b). Decriminalisation helps distinguish voluntary sex work from sexual exploitation and trafficking, lowers barriers to reporting, and improves victim identification and protection.

Adoption of the European Model would be a major step towards the human rights-based society the EU envisions. The central goals of the European Model also align with the EU's commitment to guaranteeing the **rights of women and migrants** (European Commission, 2025; European Parliament, 2021).

THE EUROPEAN MODEL

1. **Full decriminalisation** of sex work, including third-party services.
2. Legal recognition of **sex work as work**, guaranteeing access to employment protections.
3. Implementation of measures to **guarantee sex workers' rights**.

1. Context and state of play. The situation of sex workers in the EU

1.1. Sex workers face systemic challenges

Sex workers in the EU are **systematically excluded from protections** that other workers receive (Oliveira et al., 2023; CoE Commissioner for Human Rights, 2024). Sex workers, especially those belonging to marginalised groups, such as migrants and racialised individuals, experience various harms related to:

- **Work environment & safety from violence:** Lack of labour rights leaves sex workers without contracts, safe workplaces, or legal protections (Platt et al., 2018). They are exposed to high rates of violence (Oliveira et al., 2023; Rijken et al., 2017), while fear of prosecution deters reporting (Scoular et al., 2023).
- **Economic security:** Exclusion from social security systems creates economic precarity, limiting access to credit, housing, and financial services (Konečná, 2024b; Rijken et al., 2017). This also leads to greater reliance on arrangements that trap individuals in dependency and unsafe work (Oliveira et al., 2023).
- **Healthcare:** Lack of targeted services, stigmatising attitudes and discriminatory behaviour among healthcare professionals limit access to, and reduce the quality of, healthcare for sex workers (Oliveira et al., 2023; Faissner, 2024; Konečná, 2024b).
- **Stigma & discrimination:** Sex workers are affected by discrimination in many institutional contexts, including law enforcement (Brown et al., 2024; Oliveira et al., 2023; Rijken et al., 2017). Social stigma harms their mental and physical health (Hart et al., 2023).

These conditions highlight the **need for an evidence-based and rights-focused policy approach**.

1.2. Existing regulatory approaches harm sex workers

Many of the **current policy frameworks** in the EU **fail to protect the rights of sex workers**, exacerbating the violence, marginalisation, and exclusion they face. The regulatory approaches to sex work in the EU fall into four main categories (see Figure 1) (Oliveira et al., 2023). **See Table 1** for an overview of the different regulatory approaches to sex work in the EU and their consequences.

- **Full criminalisation: criminal penalties** apply to **all parties involved in sex work**, including sex workers, clients, and third parties (Platt et al., 2018). Criminalisation has **detrimental consequences** for the **health and safety of sex workers** (Albright & D'Adamo, 2017; Oliveira et al., 2023), forcing them to work in isolated locations (Ellison, Ní Dhónaill & Early, 2019), keeping them from accessing health services (Jonsson & Jakobsson, 2017), and deterring them from safe sex practices, as condoms can be used as evidence in arrests (Platt et al., 2018).
- **The 'Nordic Model' criminalises buying sex** and **third-party activities**, such as renting premises, but **not sex workers** themselves (Levy & Jakobsson, 2014). It aims to reduce demand by deterring buyers. However, there is no conclusive evidence that demand has decreased in countries that implemented the model (Burba, 2021; Della Giusta et al., 2021; Huschke & Ward, 2017). Research indicates **increased violence** against sex workers by pushing them into isolated locations to protect clients from police (Ellison, Ní Dhónaill & Early, 2019; Vuolajärvi, 2021; Vanwesenbeeck, 2017) and sex workers report **more dangerous working conditions** (see Figure 1).

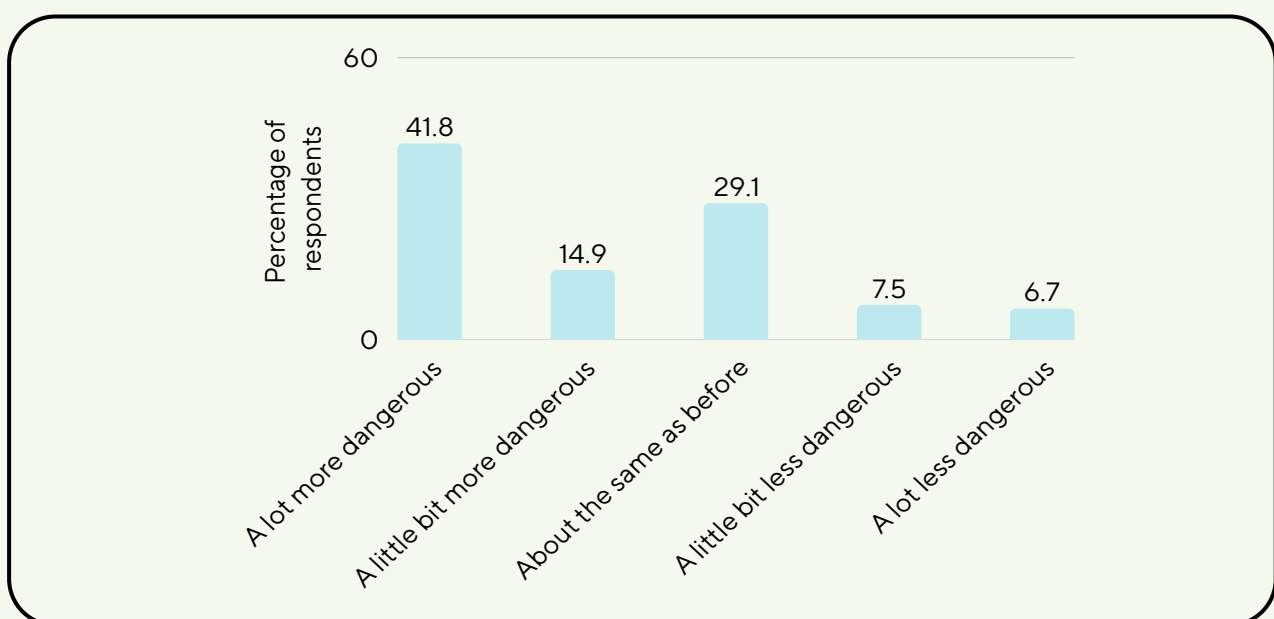


Figure 1. Sex workers' perceptions of **working conditions** since the Nordic Model was implemented in Northern Ireland (Ellison, Ní Dhónaill & Early, 2019)

- **Restrictive regulation** (or 'legalisation') is the **most widely used model** in Europe (Oliveira et al., 2020). Sex work is legal under specific regulations, which can include criminal penalties with varying degrees of restrictiveness between countries (Oliveira et al., 2020) (see Figure 3). We use the term 'restrictive regulation' to refer to policies that strictly regulate aspects of sex work, even though sex work itself is legal. This approach is sometimes called the 'legalisation' of sex work, which should not be confused with decriminalisation.

Examples of such restrictive regulations include:

1. **Criminalisation of brothel keeping**, occasionally including cases in which two sex workers share an apartment for safety reasons.
2. **Sanctioning of third parties**, e.g. those who rent an apartment to sex workers, or drive a sex worker to their workplace.
3. Regulations on where sex workers can work, such as **zoning laws**.
4. **Mandatory STI checks** or health counselling.

Even though sex work itself is technically legal, such regulations impose burdens, including criminal sanctions, on sex workers and people who support them, such as partners and friends.

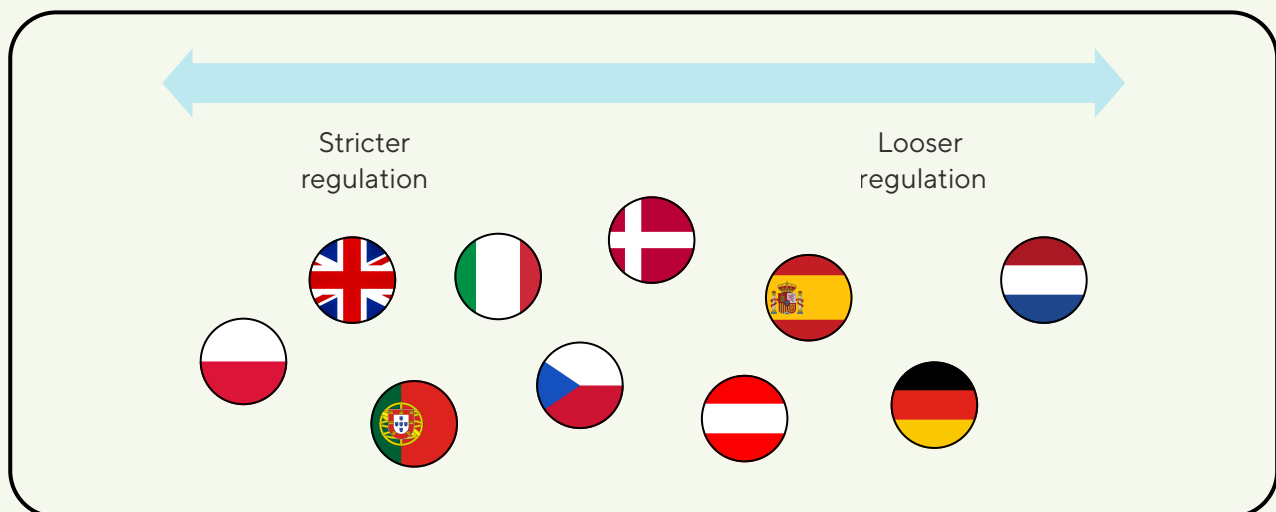


Figure 2. Sex work restrictive regulation spectrum

- **Decriminalisation**: all aspects of sex work are removed from criminal law. Within the EU, this approach has only been implemented in **Belgium**. For more on decriminalisation, see section 2.1 of this report.

MAP LEGEND:

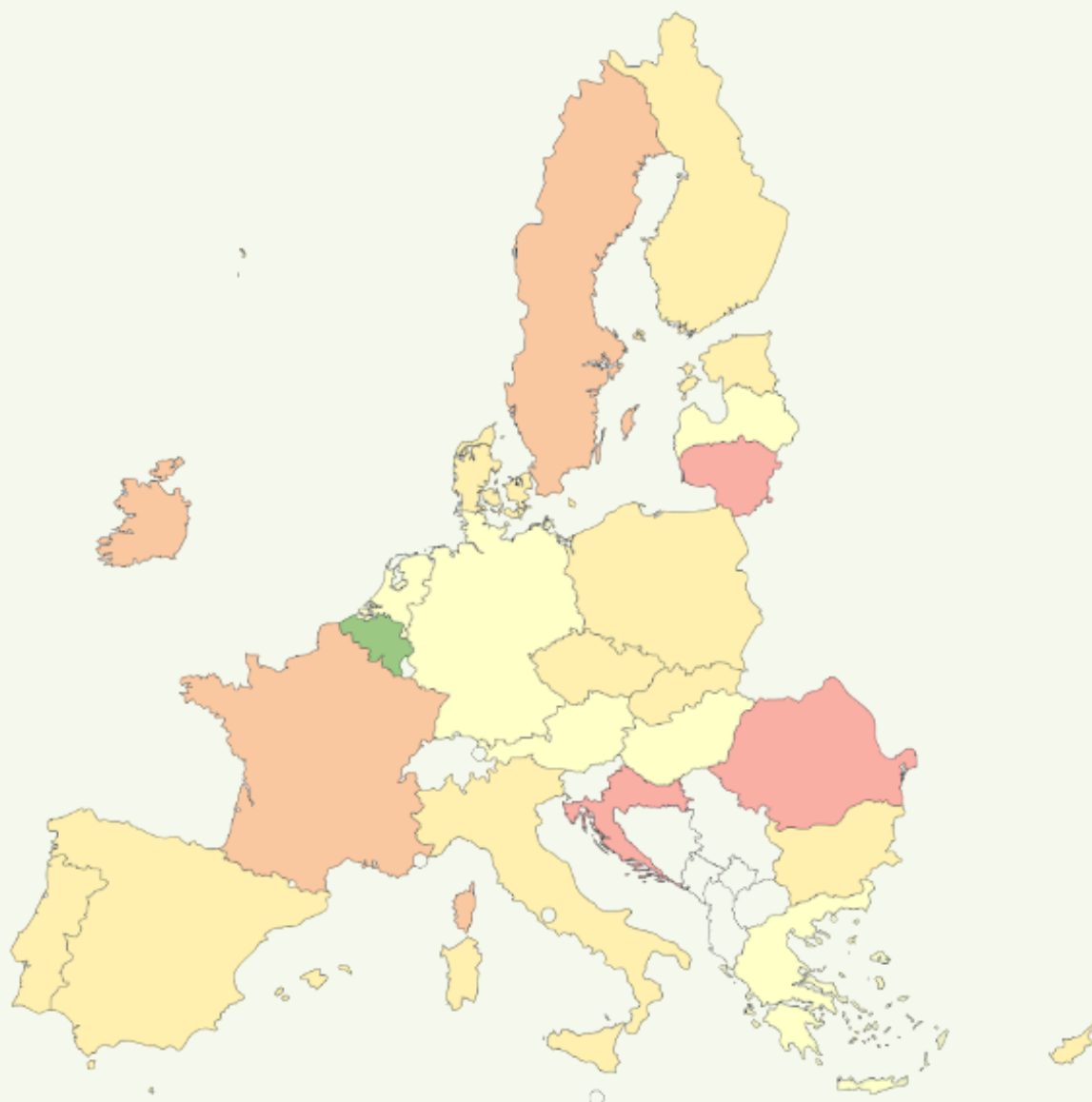
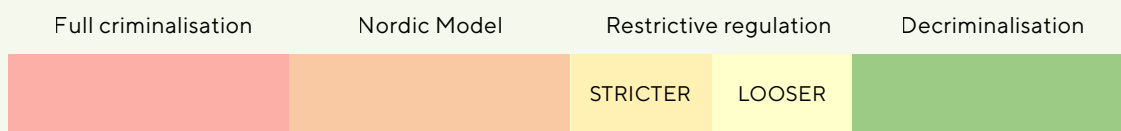


Figure 3. How sex work is regulated in the EU
(Di Nicola, 2021; Bąkowski and Prpic, 2024)

Table 1. Overview of different regulatory approaches to sex work in the EU and their consequences

MODEL	CRIMINALISATION	NORDIC MODEL	RESTRICTIVE REGULATION ('LEGALISATION')	DECRIMINALISATION
DEFINITION	Selling, purchasing and facilitating sex work are illegal and subject to prosecution. Countries: e.g. Croatia, Lithuania, Romania	Selling sex is legal, purchasing and facilitating sex work are illegal and subject to prosecution. Countries: e.g. Sweden, Ireland, France	Sex work is technically legal but heavily regulated. Some aspects of sex work and third parties are criminalised. Countries: e.g. Germany, Spain, Finland and others	All aspects of sex work are removed from criminal law; regulated like other industries. Countries: Belgium
POLICY EFFECTIVENESS	● Sex work still exists; criminalisation harms sex workers	● No proven demand reduction; negative consequences for sex workers	● Aspects of sex work are still de facto criminalised; failure to ensure sex workers' safety	● Improves safety, health, and rights of sex workers; increased transparency and better data on sex work
WORK ENVIRONMENT & SAFETY FROM VIOLENCE	● Sex workers forced into isolated working locations; reduced ability to screen clients; increased risk of violence; sex workers cannot report violence for fear of arrest; possible dependency on exploitative intermediaries	● Need to protect clients leads to working in unsafe locations, increasing risk of violence; reduced ability to screen clients	● Policies such as the prohibition of sharing apartments reduce safety; intrusive policing practices; bureaucratic barriers keep sex workers from complying with regulations	● Greater autonomy and workplace rights; protection from exploitation; reduced violence and police harassment; safer reporting of violence
ECONOMIC SECURITY	● Imprisonment and criminal records lead to difficulties finding alternative employment; economic precarity; barriers to housing and social support	● Economic insecurity	● Limited access to social benefits	● Access to social benefits and alternative jobs
HEALTHCARE	● Limited access to healthcare services; high risk of HIV and other STIs; condoms may be used as evidence in arrests	● Reduces ability to negotiate with clients; reduces safer sex practices; high STI/HIV risk	● Improvements in safer sex practices; stigmatisation still impacts health care access and quality	● Higher condom use, lower HIV risk, increased STI testing
STIGMA & DISCRIMINATION	● Negative societal attitudes; social exclusion	● Criminalisation of buyers still leads to stigmatisation of sex work; discrimination persists	● Stigma and discrimination decrease but persist	● Contributes to the reduction of stigma; legal rights promoted
SOURCES	Albright & D'Adamo, 2017; Ellison, Ni Dhónaill & Early, 2019; Jonsson & Jakobsson, 2017; Oliveira et al., 2023; Platt et al., 2018; Vanwesenbeeck, 2017	Burbo, 2021; Dello Giusto et al., 2021; Ellison, Ni Dhónaill & Early, 2019; Jordan, 2012; Levy & Jakobsson, 2014; Vanwesenbeeck, 2017; Vuolajärvi, 2022	Cruz & Von Iterson, 2010; Hydra, 2015; Oliveira et al., 2023	Abel, 2014; Armstrong, 2014; Huschke & Ward, 2017; Kim & Alliance, 2015; Maciati, Power & Bourne, 2023; Oliveira et al., 2023; Platt et al., 2018

● Negative consequence - Widespread, systemic harm

● Mixed - Significant harm for many

● Positive Minimal harm, evidence of improvement

2. Recommendations: The ‘European Model’ - A Human and Labour Rights-Based Approach

We propose a **‘European Model’ for sex work**, entailing:

1. The **full decriminalisation** of sex work, including third-party services;
2. The legal recognition of **sex work as work**, guaranteeing access to employment protections;
3. The implementation of measures to **guarantee sex workers’ rights**.

The European Model should be advanced in consultation and partnership with sex workers’ rights organisations to ensure that those most directly affected by these recommendations are involved in the policy process. Drawing on the expertise of these organisations could significantly alleviate the research, policy creation, and drafting burden of this project.

2.1. Decriminalisation

The decriminalisation of sex work is a **fundamental and necessary first step** towards upholding **the human rights** of sex workers and improving their conditions.

Decriminalisation makes sex work safer, protects **human rights** (Abel, 2014), improves the **health and wellbeing** of sex workers (Macioti et al., 2022), enhances their **access to services and justice** (Platt et al., 2018) and increases their **autonomy and capacity to protect themselves** (Pyett & Warr, 1999). Several major human rights and health organisations, including Amnesty International (2016), Human Rights Watch (2019), Human Rights Campaign (n.d.), UNAIDS (2024), WHO (The New Humanitarian, 2012), La Strada International (2023), and ILGA Europe (2018), advocate for decriminalisation.



Figure 4. Human rights organisations that support decriminalisation

Evidence from regions that have implemented decriminalisation, such as New Zealand and New South Wales (Australia), demonstrates positive impacts on sex workers' conditions and rights:

- **Improved wellbeing and health** through improved access to and engagement with health services (Macioti et al., 2022)
- **Safer working conditions** (Abel, 2014)
- **Enhanced legal rights**, including protections against exploitative management practices and clients (Abel, 2014; Armstrong, 2021)
- **Reduced stress and fear** caused by criminalisation (Armstrong, 2021)
- **Improved confidence in the legal system**, improved relationships with law enforcement and **better access to justice** (Pratt et al., 2018; Abel, Fitzgerald & Brunton, 2007; Abel, 2014)

Greater negotiating power with clients and simplified client-screening by reducing the number of risks sex workers must consider before deciding whether to accept a job (Armstrong, 2014)

Given these benefits and the EU's role in upholding human rights, the European Parliament and Commission should **adopt a Recommendation endorsing decriminalisation** across member states. This should include ending the criminalisation of third parties that support sex workers, such as accountants or drivers. Furthermore, the Parliament should **amend or overrule Procedure 2022/2139 (INI) and Procedure 2013/2103 (INI)**, which either explicitly promote the Nordic model or fail to advocate for decriminalisation. This recommendation follows Belgium's 2024 reform of its sexual criminal law (Chargois, 2024).

Decriminalisation is considered a 'critical mechanism' (Albright & D'Adamo, 2017: 124) for **reducing human trafficking**, as it would allow trafficking victims to seek help from law enforcement and healthcare workers with less fear of legal repercussions. Decriminalisation would also bring the sex work industry 'above board', **improving knowledge of, and data on, sex work**, which is currently lacking due to its underground nature. Decriminalisation would also remove the barrier of a criminal record for sex workers, simplifying the process of **accessing housing** and **transitioning into alternative forms of employment**.

Furthermore, in many jurisdictions, certain forms of sex work, such as subscription content on digital platforms (e.g. OnlyFans), are not criminalised (Rogers, 2024), creating a **regulatory asymmetry** which disproportionately

affects sex workers who engage in direct client contact and who are often the most vulnerable, while privileging those working online. **The European model eliminates these asymmetries** by treating all types of sex work equally.

ONLINE SEX WORK: A REGULATORY ASYMMETRY

While in-person sex work is subject to strict regulation or criminalisation in many EU member states (see Part 1.2), **online sex work** tends to **operate in a legal vacuum**. So far, no member state has prohibited sexual content online or sanctioned platform intermediaries under the Digital Services Act (EU, 2022).

This regulatory asymmetry leaves digital and in-person sex work governed by different standards. Sweden has recently attempted to resolve this asymmetry by criminalising the purchase of content on OnlyFans in an extension to its 'Sex Purchase Act' (Sveriges Riksdag, 2025).

However, rather than extending criminalisation into the digital sphere, we argue for the consistent, **EU-wide decriminalisation of in-person sex work**, which would end this regulatory asymmetry and uphold equal freedoms for all sex workers.

2.2. Recognising Sex Work as Work

Alongside decriminalisation, we propose the **recognition of sex work as work**. Sex workers should be considered **part of the European labour force**, and their **labour and fundamental rights** should be **respected**. While sex work involves unique risks, the best way to address these risks is through a pragmatic, labour rights-based approach and risk-specific protections. Legally recognising sex work as work is crucial for guaranteeing sex workers' equivalent protections against the unique risks they face. The absence of such protections creates conditions in which exploitation can persist unchecked.

Such an approach would not be new at the EU level. Health and safety at work is set out by principle 10 of the European Pillar of Social Rights and underpinned by Article 153 of the Treaty on the Functioning of the European Union. The 'Framework Directive' (89/391/EEC) defines principles to protect the health and safety of workers and, importantly, enables the adoption of **specific protections for the unique risks posed by different professional activities** (e.g. risks resulting from exposure to carcinogens and mutagens, vibration and noise).

The European Parliament and Commission should **issue a Recommendation that member states recognise sex** work as work. Subsequently, the Commission should **adopt a Directive** implementing labour protections for sex workers, like those introduced in Belgium in 2024 (UTSOPI, 2024). Sex workers should be afforded **employment contracts**, thus guaranteeing access to the same social security provisions as other workers: unemployment benefits, health insurance, annual vacation, workplace security, the right to unionise, maternity and sick leave and retirement pension rights. Furthermore, the Directive should provide **sector-specific protections** for sex workers, in line with the Belgian labour law (UTSOPI, 2024), including:

1. Five rights: a) to refuse a client; b) to refuse a sexual act; c) to interrupt a sexual act at any time; d) to perform a sexual act in the manner they wish; e) to refuse to advertise oneself.
2. Sex workers are entitled to end their contract at any time, without compensation or being required to serve a notice period.
3. When sex workers voluntarily end their contracts, they do not lose their right to unemployment benefits.

2.3. Complementary Measures to Guarantee Sex Workers' Rights

Recommending member states **decriminalise sex work** and **recognise it as work** would be an impactful action by the EU, but these alone cannot fully guarantee sex workers' human rights. Several complementary measures should be funded to support the rights and well-being of sex workers. The following align with the demands outlined in the Strategic Plan of the European Sex Workers Rights Alliance ([ESWA, 2020](#)):

- Promote **destigmatisation-oriented informational campaigns** for the public, combating misrepresentations of sex workers.
- Provide **anti-bias training** for law enforcement and healthcare professionals. To provide adequate care, healthcare workers need to adopt an anti-discriminatory approach and be aware of sex workers' specific needs.
- Implement a **firewall between immigration authorities and service provision** (e.g. policing, education and social and health services). Undocumented sex workers should be free to report instances of violence to the police without risk of discrimination or punitive consequences such as deportation. **Anonymous access to service provision** should be provided for the most marginalised sex workers.

- Extend the **protections and rights** guaranteed under the **EU Victims' Rights Directive** to sex workers. Consider using peer outreach networks, non-law enforcement counsellors and resources to provide safe and accessible channels for sex workers to report abuse and receive legal support.
- Expand **access to healthcare**, including free and anonymous testing of sexually transmitted infections (STIs). While sex workers are particularly at risk of contracting STIs, free testing benefits everyone as STI rates rise in the EU ([ECDC, 2025](#)). Free and anonymous STI testing, particularly self-testing kits sent to homes, is a practical strategy for counteracting stigma and allowing people to get tested more regularly.
- Provide funding for **sex worker-led organisations** and **peer-to-peer outreach programs** on topics such as physical and mental health and safety, labour and legal rights, and financial and institutional literacy (Benoit et al., 2017, [NSWP, 2022](#)). This involves sex workers sharing their own experiences and knowledge with others in the community especially

2.4. Broader Impact of the European Model

2.4.1. Efficiently Tackling Human Trafficking

[Eurostat data](#) (Eurostat 2025) reports that over 40% of identified human trafficking victims in the EU in 2023 were subject to sexual exploitation, underscoring the urgency of adopting effective anti-trafficking policies. Contrary to claims that decriminalising sex work promotes exploitation, **evidence suggests** that it **facilitates identifying and protecting trafficking victims**. When sex work is decriminalised, authorities and support services are better equipped to distinguish between consensual sex work and coercion, which is essential for strengthening anti-trafficking efforts (Thiemann, 2020; Leonelli, 2023).

Decriminalisation reduces barriers to reporting human trafficking, such as fear of police harassment or legal consequences. This **creates safer conditions** for victims to **seek help** and **authorities to intervene effectively** (Deering et al., 2014). It establishes a **clear legal distinction between consensual sex work and trafficking**, which is essential for successful prosecution (Kempadoo & Durisin, 2020). Notably, major international anti-trafficking organisations such as the Global Alliance Against Trafficking in Women and La Strada International oppose the criminalisation of sex work ([ESWA n.d.](#), [ICSRE, 2019](#), [Kenway, n.d.](#), [La Strada, 2023](#)).

Involving sex workers and their representative organisations in developing anti-trafficking legislation is crucial to **ensure that policies address exploitation without reinforcing harm**. Sex workers' lived experiences offer critical insights that improve the design and impact of interventions (Bond, 2023). Moving away from punitive models and towards human and labour rights-based approaches leads to more just and effective outcomes for both sex workers and trafficking victims (Jeffreys et al., 2011).

2.4.2. Economic Benefits

The criminalisation of any aspect of sex work incurs costs for law enforcement and judicial systems, with negligible benefits to public safety. Therefore, **decriminalising sex work also presents an economic opportunity for EU member states**. Adopting the European Model could generate substantial public revenue through taxation and business application fees and reduce healthcare and criminal justice expenditures.

Although limited in number, some existing economic models assessing the benefits of decriminalisation in other regions offer valuable projections. For example, a cost-benefit analysis suggests that the decriminalisation of sex work in Washington, D.C. could yield an annual gain of \$5,348.68 per sex worker (Srsic, Dubas-Jakóbczyk & Kocot, 2021). This figure comprises \$5,058.08 in income tax revenue and \$290.60 in health sector savings per sex worker, due to reductions in violence and STIs.

Extrapolating these figures to the EU context, and assuming analogous gains as in the above study, this could amount to **a potential annual economic benefit of approximately €5.77 billion per year** (see Figure 5). This exceeds the EU's annual expenditure on strategic investments (€4.6 billion), its annual Erasmus+ budget (€3.7 billion) and is almost double its budget for environmental and climate action (€2.4 billion) (European Commission, 2023). Given that reliable data on the number of sex workers in Europe are difficult to obtain due to sex work's informal nature, **these estimates are likely to be conservative**.

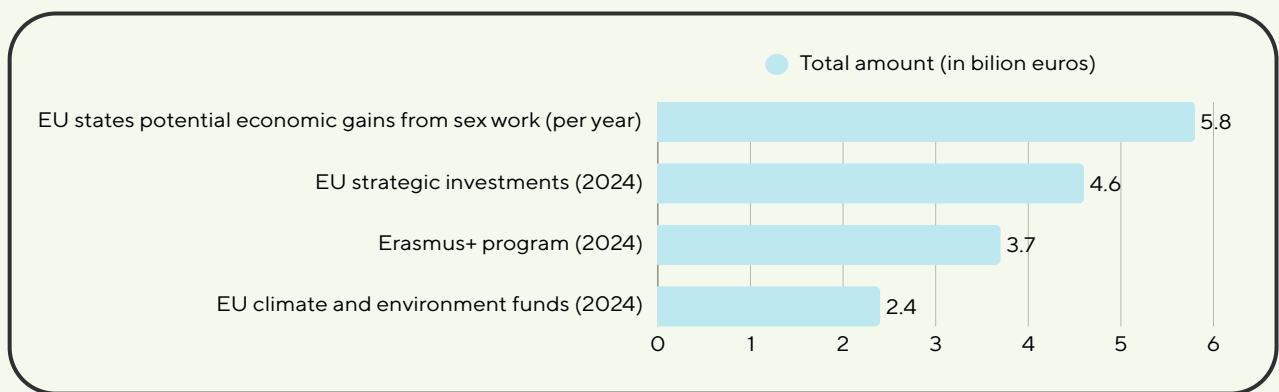


Figure 5. Comparison between potential economic gains from decriminalising sex work at the EU level and some comparable EU budget areas

3. Conclusions: An Opportunity for EU Leadership

As criminal law is a matter of national jurisdiction, the EU cannot directly influence the criminalisation of sex work in member states. However, it still has an important leadership role to play in ensuring **human rights are respected** across member states, through **directives, recommendations** or other **‘soft’ policy tools**.

3.1. European Engagement Thus Far

The EU has already taken action on the issue of sex work regulation several times (Figure 6). However, it has failed to set a clear standard in line with core EU values.

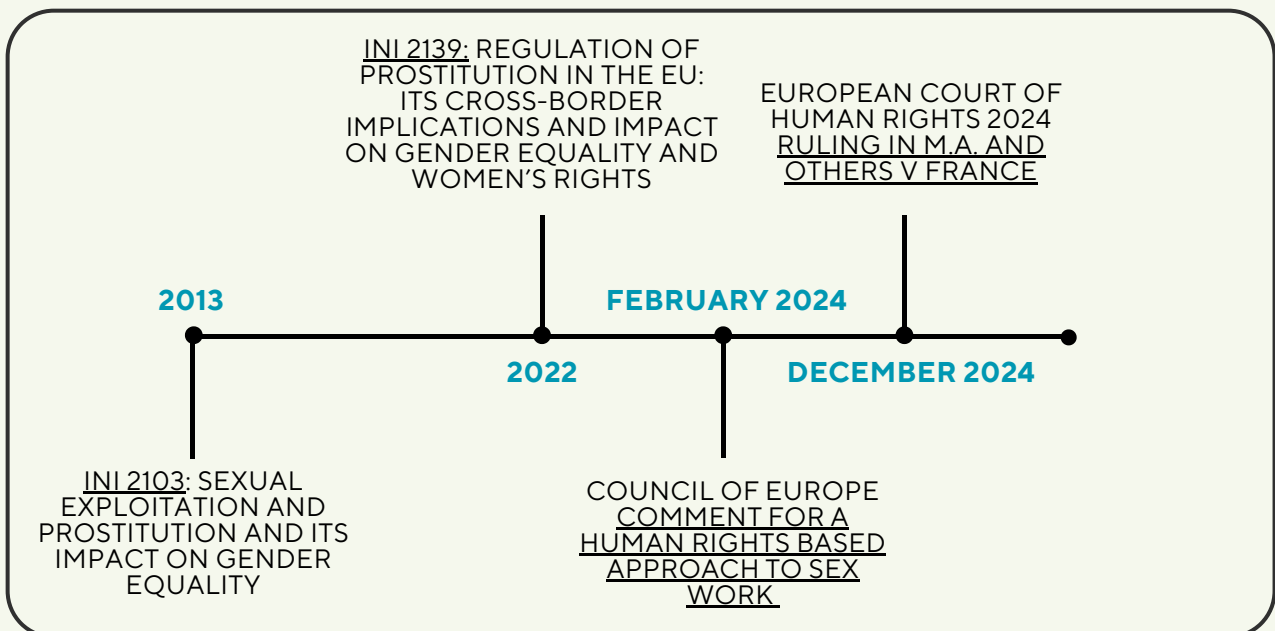


Figure 6. Timeline of recent key policy developments related to sex work in Europe

The EU sporadic support for the Nordic Model

Over time, the EU has either recommended the implementation of a Nordic Model in member states (European Parliament 2014) or issued unclear recommendations (European Parliament 2023). The latest official statement by the European Parliament - an own-initiative report (INI) on the 'Regulation of prostitution in the EU' - faced heated debate prior to its adoption. Sex workers' rights groups, as well as international human rights organisations such as Human Rights Watch and Amnesty International, voiced **strong opposition to an original draft report** that explicitly

advocated for the Nordic model. While these efforts successfully removed those parts of the original draft that are linked to demonstrable harms, the INI still fails to support the full decriminalisation of sex work.

Moreover, in a highly publicised legal case, the European Court of Human Rights ruled that a French law introducing the Nordic model did not violate Article 8 of the European Convention on Human Rights (ECHR, 2024). This ruling has been condemned by several human rights and expert advocacy organisations (ILGA 2024).

Contrasts with Other Key European and Global Actors

Other key international and European institutions disagree with this approach. For example, the Council of Europe Commissioner for Human Rights issued a comment on the **importance of decriminalising sex workers**, clients, and third parties, rejecting criminal penalties for consensual adult transactions (CoE Commissioner for Human Rights, 2024). He urged member states to adopt a human rights-based approach to consensual adult sex work, ensuring protection from violence and abuse, as well as equal access to healthcare, social services and political participation.

Moreover, Belgium, where sex work was decriminalised in 2022, has promoted important dialogues at EU institutions, including a discussion on sex work with the 27 EU Ministers of Justice, pioneered by Belgian Justice Minister Paul Van Tigchelt, with an intervention from ESWA (Konečná, 2024a).

These European voices align with a trend toward **consensus across international human rights organisations that strongly advocate for the decriminalisation of sex work** (see Figure 4). There is evident discord between the approach of EU institutions and the views of the world's most reputable human rights organisations.

3.2. Towards the European Model: The EU's Next Steps

EU standard-setting has thus far failed sex workers either by remaining silent or advocating for the Nordic model. To ensure the full implementation of the European Model, we propose the following **legislative, economic and political agenda**:

LEGISLATIVE MEASURES

AMEND or **OVERRULE** the EU Parliament's Procedure 2022/2139 (INI) and the Procedure 2013/2103 (INI), which either explicitly promote the Nordic model or fail to advocate for decriminalisation.

ISSUE a Recommendation or Resolution to member states to decriminalise sex work and recognise sex work as work.

ADOPT a Directive implementing labour protections for sex workers and specific regulations to address the unique risks in the industry.

ECONOMIC MEASURES

FUND the measures proposed to support the social, physical and mental well-being of sex workers so that they are uniformly provided across the member states. Consider mobilising the EU Social Fund Plus to support member states in these initiatives.

PARTICIPATORY MEASURES

ENGAGE with sex workers' rights organisations and include them in the drafting of regulatory documents or recommendations to ensure those most directly affected by the recommendations are involved in the policy process.

PARTNER with sex workers' rights organisations for the implementation of any resulting EU-funded support measures.

This package would:

1. align EU policy on sex work with both the **scientific evidence** and the **recommendations** of human rights organisations and sex worker advocacy groups,
2. position the **EU as a global leader** in implementing human and labour rights-based approach to regulating sex work,
3. **improve the lives of sex workers** across Europe.

Glossary

CoE - Council of Europe

EU - European Union

ESWA - European Sex Workers' Rights Alliance

ILGA - International Lesbian, Gay, Bisexual, Trans and Intersex Association

INI - Own-Initiative Report

NSWP - Global Network of Sex Work Projects

STI - Sexually Transmitted Infections

UNAIDS - Joint United Nations Programme on HIV/AIDS

UTSOPI - Union of Sex Workers Organisations in Europe

WHO - World Health Organisation

References

- Abel, G. M. (2014). A decade of decriminalisation: Sex work 'down under' but not underground. *Criminology & Criminal Justice*, 14(5), 580–592. <https://doi.org/10.1177/1748895814523024>
- Abel, G., Fitzgerald, L., & Brunton, C. (2007). The impact of the Prostitution Reform Act on the health and safety practices of sex workers. Report to the Prostitution Law Review Committee, University of Otago, Christchurch. Retrieved 14.08.2025 from: https://www.otago.ac.nz/_data/assets/pdf_file/0027/248760/pdf-811-kb-018607.pdf
- Adair, P. & Nezhyvenko, O. (2017). Assessing how large is the market for prostitution in the European Union. *Ethics and Economics*, 14 (2): 116–136.
- Albright, E. & D'Adamo, K. (2017). Decreasing Human Trafficking through Sex Work Decriminalization. *AMA Journal of Ethics*, 19(1): 122–126. <https://doi.org/10.1001/journalofethics.2017.19.1.sect2-1701>
- Armstrong, L. (2014). Screening clients in a decriminalised street-based sex industry: Insights into the experiences of New Zealand sex workers. *Australian & New Zealand Journal of Criminology*, 47(2), 207–222. <https://doi.org/10.1177/0004865813510921>
- Armstrong, L. (2021). 'I Can Lead the Life That I Want to Lead': Social Harm, Human Needs and the Decriminalisation of Sex Work in Aotearoa/New Zealand. *Sexuality Research & Social Policy* 18, 941–951. <https://doi.org/10.1007/s13178-021-00605-7>
- Bąkowski, P. & Prpic, M. (2024). Regulation of prostitution in the European Union. Laws and policies in selected EU member states. European Parliamentary Research Service. Retrieved 14.08.2025 from: [https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA\(2024\)762354_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA(2024)762354_EN.pdf)
- Benoit, C., Belle-Isle, L., Smith, M., Phillips, R., Shumka, L., Atchison, C., ... & Flagg, J. (2017). Sex workers as peer health advocates: community empowerment and transformative learning through a Canadian pilot program. *International Journal for Equity in Health*, 16(1), 160. Retrieved 14.08.2025 from: <https://equityhealthj.biomedcentral.com/articles/10.1186/s12939-017-0655-2>
- Bond, P. L. (2023). "What can you do? Capitalism exists" Sex work and the contemporary work system in Aotearoa New Zealand (Doctoral dissertation, University of Otago). Retrieved 14.08.2025 from: <https://hdl.handle.net/10523/14856>
- Burba, D. (2021). The Nordic model in Europe: Prostitution, trafficking and neo-abolitionism (Master's thesis, University of Pisa). *European Law and Gender*. Retrieved 14.08.2025 from: https://www.academia.edu/50493737/The_Nordic_Model_in_Europe_Prostitution_Trafficking_and_Neo_Abolitionism

- Brown, K., Grace, S., & Redman, S. (2024). Policing vulnerability: The care and control of sex workers through designated police officers. *The British Journal of Criminology*, 65(1), 17–36. <https://doi.org/10.1093/bjc/azae026>
- Chargois, M. (2024). Belgium: A Transformative Law for Sex Workers Rights, IPPF (online). Retrieved 14.08.2025 from: <https://www.ippf.org/featured-perspective/belgium-transformative-law-sex-workers-rights>
- Della Giusta, M., Laura Di Tommaso, M., Jewell, S., & Bettio, F. (2019). Quashing Demand Criminalizing Clients? Evidence from the UK. *IZA Discussion Papers*, 12405, 1–29. Retrieved 14.08.2025 from: <https://hdl.handle.net/10419/202751>
- Di Nicola, L. (2021) The differing EU Member States’ regulations on prostitution and their cross-border implications on women’s rights. Policy Department for Citizens’ Rights and Constitutional Affairs Directorate-General for Internal Policies. Retrieved 14.08.2025 from: [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/695394/IPOL_STU\(2021\)695394_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/695394/IPOL_STU(2021)695394_EN.pdf)
- Ellison, G., Ní Dhónaill, C., & Early, E. (2019). A review of the criminalisation of the payment for sexual services in Northern Ireland. *ERin, A Review of the Criminalisation of the Payment for Sexual Services in Northern Ireland* (September 19, 2019). <http://dx.doi.org/10.2139/ssrn.3456633>
- Eurostat. (2025). Trafficking in human beings statistics. Statistics Explained. Retrieved 14.08.2025 from: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Trafficking_in_human_beings_statistics
- Eurostat (2024). Accidents at work statistics. Retrieved 14.08.2025 from: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Accidents_at_work_statistics#Analysis_by_activity
- Faissner, M., Beckmann, L., Freistein, K., Jungilligens, J., & Braun, E. (2024). Healthcare for sex workers—access, barriers, and needs: An exploratory qualitative interview study. *Ethik in der Medizin*, 36(2), 151–168. <https://doi.org/10.1007/s00481-024-00815-8>
- Hart, G., Allen, A., Aubyn, B. S., & Mason, J. (2023). Exploring the relationships between internalised stigma, loneliness, and mental well-being among sex workers. *Sexuality & Culture*, 27(1), 191–210. <https://doi.org/10.1007/s12119-022-10009-3>
- Human Rights Campaign. (2019). HRC supports important D.C. decriminalization legislation. Retrieved 14.08.2025 from: <https://www.hrc.org/news/hrc-supports-important-washington-d-c-decriminalization-legislation>
- Human Rights Campaign (n.d.). ‘Beyond the Stereotypes: A Deep Dive Into Sex Work’. Retrieved 14.08.2025 from: <https://www.hrc.org/resources/beyond-the-stereotypes-a-deep-dive-into-sex-work>

- Huschke, S., & Ward, E. (2017). Stopping the traffick? The problem of evidence and legislating for the 'Swedish model' in Northern Ireland. *Anti-Trafficking Review*, (8), 16–33. <https://doi.org/10.14197/atr.20121782>
- Hydra e.V. (2016). Sex workers want peer knowledge, not state control. openDemocracy. Retrieved 14.08.2025 from: <https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/sex-workers-want-peer-knowledge-not-state-control/>
- Jeffreys, E., Green, J., & Vega, C. (2011). Listen to sex workers: Support decriminalisation and anti-discrimination protections. *Interface*, 3(2), 271–287. Retrieved 14.08.2025 from: <https://interfacejournal.net/wordpress/wp-content/uploads/2011/12/Interface-3-2-Scarlet-Alliance.pdf>
- Johnson, H., & Matthews, R. (2016). Addressing prostitution: The Nordic model and beyond. In *What is to Be Done About Crime and Punishment?* (pp. 281–308). Palgrave Macmillan. https://doi.org/10.1057/978-1-137-57228-8_11
- Kempadoo, K., & Durisin, E. M. (2020). Sex work and sex trafficking. *Companion to Sexuality Studies*, 409–426. <https://doi.org/10.1002/9781119315049.ch22>
- Konečná, I. (2024a). The 27 Ministers of Justice of the EU MSs Discussed Sex Work. European Sex Workers' Rights Alliance. Retrieved 14.08.2025 from: https://www.eswalliance.org/the_27_ministers_of_justice_of_the_eu_mss_discussed_sex_work
- Konečná, I. F. (2024b). Excluded but fighting: Where are the voices of sex workers and their allies in EU anti-trafficking policymaking? *Social Sciences*, 13(3), 148. <https://doi.org/10.3390/socsci13030148>
- Macioti, P.G., Power, J. & Bourne, A. (2023). The Health and Well-being of Sex Workers in Decriminalised Contexts: A Scoping Review. *Sexuality Research & Social Policy* 20, 1013–1031. <https://doi.org/10.1007/s13178-022-00779-8>
- Oliveira, A., Lemos, A., Mota, M., & Pinto, R. (2020). Less equal than others: The laws affecting sex work, and advocacy in the European Union. University of Porto/The Left (Group of the European Parliament). Retrieved 14.08.2025 from: <https://repositorio-aberto.up.pt/bitstream/10216/133560/2/461540.pdf>
- Oliveira, A., Lemos, A., Mota, M., & Pinto, R. (2023). Understanding the impact of EU prostitution policies on sex workers: A mixed study systematic review. *Sexuality Research and Social Policy*, 20(4), 1448–1468. <https://doi.org/10.1007/s13178-023-00814-2>
- Platt, L., Grenfell, P., Meiksin, R., Elmes, J., Sherman, S. G., Sanders, T., & Crago, A.-L. (2018). Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies. *PLoS Med*, 15(12). <https://doi.org/10.1371/journal.pmed.1002680>

- Pyett, P., & Warr, D. (1999). Women at risk in sex work: strategies for survival. *Journal of Sociology*, 35(2), 183-197. <https://doi.org/10.1177/144078339903500204>
- Srsic, A., Dubas-Jakóbczyk, K., & Kocot, E. (2021). The Economic Consequences of Decriminalizing Sex Work in Washington, DC—A Conceptual Model. *Societies*, 11(3), 112. <https://doi.org/10.3390/soc11030112>
- Sveriges Riksdag (2025). Proposition 2024/25:124: Skärpt syn på sexuella kränkningar, bedrägerier mot äldre och brott med kön som hatbrottsmotiv. Retrieved 14.08.2025 from: https://www.riksdagen.se/sv/dokument-och-lagar/dokument/proposition/skarpt-syn-pa-sexuella-krankningar-bedragerier_hc03124/
- Scoular, J., Sanders, T., Campbell, R., & Pitcher, J. (2023). Legal consciousness and sexual violence in sex work: Comparing legal contexts in England and Wales, Northern Ireland, and Scotland. *Social & Legal Studies*, 32(2), 237-258. <https://doi.org/10.1007/978-3-031-77715-8>
- Vuolajärvi, N. (2022). Criminalising the sex buyer: Experiences from the Nordic region. Centre for Women, Peace & Security, London School of Economics and Political Science. Retrieved 14.08.2025 from: <https://www.lse.ac.uk/women-peace-security/assets/documents/2022/W922-0152-WPS-Policy-Paper-6-singles.pdf>

Legal references

- Treaty on the Functioning of the European Union, Consolidated version, OJ C 326, 26.10.2012, pp. 47-390. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/treaty/tfeu/2012/oj/eng>
- Directive 2024/1712/EU of 13 June 2024 on preventing and combating trafficking in human beings and protecting its victims. OJ L 2024/1712, 24 June 2024. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng>
- Directive 2024/1385/EU of 14 May 2024 on combating violence against women and domestic violence. OJ, L2024/1385. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2024/1385/oj>
- Directive 2011/36/EU of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA. OJ, L 101, 1-11. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2011/36/oj/eng>

- Directive 2004/37/EC of 29 April 2004 on the protection of workers from the risks related to exposure to carcinogens or mutagens at work, OJ L 158, 30.4.2004, pp. 50–76. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2004/37/oj/eng>
- Directive 2003/10/EC on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (noise), OJ L 42, 15.2.2003, pp. 38–44. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2003/10/oj/eng>
- Directive 2002/44/EC on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (vibration), OJ L 177, 6.7.2002, pp. 13–20. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/2002/44/oj/eng>
- Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work, OJ L 183, 29.6.1989, pp. 1–8. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/dir/1989/391/oj/eng>
- Regulation 2022/2065 of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>

Case law

- ECHR (2024). *Affaire M.A. et Autres c. France*. European Court of Human Rights. Retrieved 14.08.2025 from: [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-235143%22](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-235143%22)

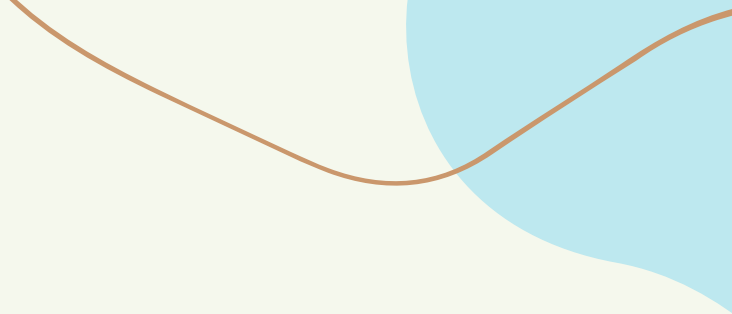
Soft law and Reports

- Amnesty International. (2024). Europe: Failure to recognise harm caused by criminalization of sex work is a 'missed opportunity'. Retrieved 14.08.2025 from: <https://www.amnesty.org/en/latest/news/2024/07/europe-failure-to-recognise-harm-caused-by-criminalization-of-sex-work-is-a-missed-opportunity/>
- Amnesty International. (2023). United Nations experts: Full decriminalization of adult voluntary sex work holds the greatest promise to address systemic discrimination and violence. Retrieved 14.08.2025 from: <https://www.amnesty.org/en/latest/news/2023/09/united-nations-experts-this-week-said-that-that-full-decriminalization-of-adult-voluntary-sex-work-holds-the-greatest-promise-to-address-the-systemic-discrimination-and-violence-sex-workers-frequently/>

- Amnesty International (2016). Amnesty International policy on state obligations to respect, protect and fulfil the human rights of sex workers (Index No. POL 30/4062/2016). Retrieved 14.08.2025 from: <https://www.amnesty.org/en/documents/pol30/4062/2016/en/>
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions a Roadmap for Women's Rights, COM/2025/97 final. Retrieved 14.08.2025 from: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025DC0097>
- Deering, K. N., Amin, A., Shoveller, J., Nesbitt, A., Garcia-Moreno, C., Duff, P., ... & Shannon, K. (2014). A systematic review of the correlates of violence against sex workers. American journal of public health, 104(5), e42-e54. <https://doi.org/10.2105/AJPH.2014.301909>
- European Commission (2023) EU budget 2024: Enabling Europe to address its priorities. Retrieved 14.08.2025 from: https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3062
- European Commission: Directorate-General for Justice and Consumers, 2021 report on gender equality in the EU, Publications Office, 2021. Retrieved 14.08.2025 from: <https://op.europa.eu/en/publication-detail/-/publication/11d9cab1-fa52-11eb-b520-01aa75ed71a1/language-en>
- Council of Europe Commissioner for Human Rights. (2024). Human Rights Comment: Protecting the human rights of sex workers. The Commissioner's Human Rights Comments. Council of Europe. Retrieved 14.08.2025 from: <https://www.coe.int/en/web/commissioner/-/protecting-the-human-rights-of-sex-workers>
- Council of Europe. (2011). Council of Europe Convention on preventing and combating violence against women and domestic violence. Istanbul, 11 May 2011. Retrieved 14.08.2025 from: <https://www.coe.int/en/web/gender-matters/council-of-europe-convention-on-preventing-and-combating-violence-against-women-and-domestic-violence>
- European Centre for Disease Prevention and Control. (2025, February 10). STI cases continue to rise across Europe. Retrieved 14.08.2025 from: <https://www.ecdc.europa.eu/en/news-events/sti-cases-continue-rise-across-europe>
- ESWA (2023). Conditions, Control and Consent: Exploring the impact of platformisation of sex work. Retrieved 14.08.2025 from: https://www.eswalliance.org/conditions_control_and_consent_exploring_the_impact_of_platformisation_of_sex_work
- ESWA (2020). Strategic Plan 2021-2025. Retrieved 14.08.2025 from: https://www.eswalliance.org/strategic_plan

- ESWA (n.d.). What about trafficking? Retrieved 14.08.2025 from: https://www.eswalliance.org/what_about_trafficking_english
- European Parliament (2023a). Report on the regulation of prostitution in the EU: its cross-border implications and impact on gender equality and women's rights (A9-0240/2023). Retrieved 14.08.2025 from: https://www.europarl.europa.eu/doceo/document/A-9-2023-0240_EN.html
- European Parliament (2023b). European Parliament resolution on the regulation of prostitution in the EU: its cross-border implications and impact on gender equality and women's rights (2022/2139(INI)) [P9_TA(2023)0328]. Retrieved 14.08.2025 from: https://www.europarl.europa.eu/doceo/document/TA-9-2023-0328_EN.html
- European Parliamentary Research Service. (2024). Regulation of prostitution in the European Union: Laws and policies in selected EU Member States (PE 762.354). [https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA\(2024\)762354_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA(2024)762354_EN.pdf)
- Global Network of Sex Work Projects. (2022) (NSWP). Strategic Plan 2022-2025. Retrieved 14.08.2025 from: [https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA\(2024\)762354_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/IDAN/2024/762354/EPRS_IDA(2024)762354_EN.pdf)
- Global Network of Sex Work Projects (NSWP) (2010). Sex work and the law: The case for decriminalisation. Retrieved 14.08.2025 from: <https://www.nswp.org/resource/other-publications/sex-work-and-the-law-the-case-decriminalisation>
- Human Rights Watch (2019). 'Why Sex Work Should Be Decriminalized: Questions and Answers'. Retrieved 14.08.2025 from: <https://www.hrw.org/news/2019/08/07/why-sex-work-should-be-decriminalized>
- International Lesbian, Gay, Bisexual, Trans and Intersex Association, ILGA (2024). Joint Statement: Human rights groups regret outcome of European Court ruling on France's criminalisation policies in relation to sex work. ILGA-Europe. Retrieved 14.08.2025 from: <https://www.ilga-europe.org/news/joint-statement-human-rights-groups-regret-outcome-of-european-court-ruling-on-frances-criminalisation-policies-in-relation-to-sex-work/>
- International Lesbian, Gay, Bisexual, Trans and Intersex Association, ILGA Europe (2018). Empowering LGBTI sex workers towards the full respect of their human rights: ILGA-Europe's position paper. Retrieved 14.08.2025 from: <https://www.ilga-europe.org/files/uploads/2022/06/Empowering-LGBTI-sex-workers.pdf>

- International Committee on the Rights of Sex Workers in Europe (ICRSE). (2019). A brief guide on collateral damages of anti-trafficking laws and measures on sex workers. Retrieved 14.08.2025 from: https://d3n8a8pro7vhmx.cloudfront.net/eswa/pages/147/attachments/original/1631373323/Collateral_Damage_-_INTERACTIVE.pdf?1631373323
- Kenway, E (n.d.). Briefing: Tackling Trafficking under a Decriminalisation model. Retrieved 14.08.2025 from: https://d3n8a8pro7vhmx.cloudfront.net/eswa/pages/110/attachments/original/1629299176/Briefing_Tackling_Trafficking_under_a_Decriminalisation_Model.pdf?1629299176
- La Strada International (2023). Open Letter to MEPs: Reject the Prostitution Report. Retrieved 14.08.2025 from: <https://www.lastradainternational.org/news/open-letter-to-meps-reject-the-prostitution-report/>
- Leonelli, A. (2023). A business doing pleasure: Combating sex trafficking by decriminalizing sex work. *Journal of Civil Rights and Economic Development*, 36(3), 4. <https://scholarship.law.stjohns.edu/cgi/viewcontent.cgi?article=1943&context=jcred>
- The European Pillar of Social Rights Action Plan (2021) (https://www.cedefop.europa.eu/files/european_pillar_of_social_rights_action_plan.pdf)
- The New Humanitarian (2012). New WHO guidelines urge decriminalization of sex work. Retrieved from <https://www.thenewhumanitarian.org/news/2012/12/18/new-who-guidelines-urge-decriminalization-sex-work#:~:text=The%20UN%20World%20Health%20Organization,work%20towards%20decriminalizing%20sex%20work>
- Thiemann, I. K. (2020). Sex Work Regulation, Anti-trafficking Policy, and Their Effects on the Labour Rights of Sex Workers in Germany. *International Journal of Comparative Labour Law and Industrial Relations*, 36(2). <https://doi.org/10.54648/ijcl2020011>
- United Nations Palermo Protocol (2000) https://www.unodc.org/res/human-trafficking/2021the-protocol-tip_html/TIP.pdf
- UNAIDS (2024). Press Statement: To protect sex workers' health, protect their human rights. Retrieved from https://www.unaids.org/en/resources/presscentre/pressreleaseandstatementarchive/2024/june/20240602_sex-workers
- UNAIDS. (n.d.). Decriminalization. <https://www.unaids.org/en/topic/decriminalization>
- UTSOPI (2024). Belgian labor law for sex workers: what and how?. <https://www.utsopi.be/our-work/decriminalisation/cadre-du-travail>



Acknowledgements

We would like to express our sincere gratitude to the representatives of various European sex workers' rights organisations, academics, and the Members of the European Parliament who generously shared their time, insights, and experiences. Their openness and expertise have been invaluable to this study, and their contributions have greatly enriched the depth and quality of the research.

We would also like to thank Mireia Artigot Golobardes for her patient and enthusiastic support as our supervising teaching fellow. Thank you also to Tracey Sowerby, Andrew Graham, and Antony Teasdale for their constructive remarks during the research process.

Thank you to the Europeaum and the Europaeum Scholars Programme for financially facilitating this work.