

Let's Talk About Sex (Work): An analysis of the criminalization of sex work in Canada

Bonnie Densmore
University of British Columbia

Abstract. This paper examines the implementation of the 2014 *Protection of Communities and Exploited Persons Act (PCEPA)* and how it has impacted the experiences of sex workers in Canada. Previous research on this topic has largely focused on the effects of prostitution laws prior to 2014. This work emphasized the risks associated with the profession, the relations between workers and protective services, and the stigmatization of the industry. I aim to contribute to this literature on sex work in Canada by analyzing reports and news articles from five sex work advocacy groups across Canada to evaluate the effects of the *PCEPA*. Findings indicate that not only has the *PCEPA* failed to correct its previous shortcomings, but it has further amplified the risks associated with the profession, alienation from law enforcement and health services, and the stigmatization of sex workers.

Introduction

Dirty. Immoral. Homewrecker. These are some of the words that encapsulate 'whorephobia': the stigmatization and discrimination against sex workers (Bruckert & Chabot, 2010). Historically, sex workers have been alienated from Canadian society and have subsequently been targets of violence and harassment. This is widely argued to be a result of the criminalization of the sex work industry. Prior to 2014, under the *Criminal Code of Canada*, sex work itself was not illegal, but virtually every activity relating to it was criminalized. This included living on the avails of prostitution, owning or working in a bawdy house, and communicating in public places for the purposes of purchasing or selling sexual services (*Criminal Code*, 1985). However, the *Attorney General of Canada v. Bedford* (2013) legal case deemed those particular laws unconstitutional because they violated the section of the *Charter of Rights and Freedoms* which protects the security

of a person. As a result, they were struck down. Subsequently, Bill C-36, the *Protection of Communities and Exploited Persons Act (PCEPA)*, was enacted in 2014, which criminalized the purchase of sex, and the advertisement of sexual services. Substantial research pertaining to regarding the criminalization of sex work was published prior to the enactment of the *PCEPA* emphasizing the challenges that sex workers face in their profession. This includes the risks associated with the job, worker's unfavourable relationship with police and health care services, and the stigma that they endure. However, there has been minimal literature readdressing these concerns, since the introduction of Bill C-36 in 2014. Due to this lack in updated research pertaining to the criminalization of sex work, I will analyze online content by sex worker rights groups to address the following question: how has the enactment of the *PCEPA* affected the experience of sex workers in Canada?

Defining Terms

To understand the discussion around sex work, it is crucial to define relevant terms pertaining to sex work and the sex industry. Sex work refers to “commercial sexual services, performances, or products given in exchange for material compensation.” (Weitzer, 2000, p. 3). This term is often used interchangeably with ‘prostitution’ but is increasingly favoured because it offers more agency to the workers and it is less stigmatizing. In this paper, I will be using the term ‘sex work’, but it is important to note that under Canadian law, the term ‘prostitution’ is still used. The term sex industry refers to “the workers, managers, owners, agencies, clubs, trade associations, and marketing involved in sexual commerce, both legal and illegal varieties.” (Weitzer, 2000, p. 3). Harcourt & Donovan (2005) have provided a typology to distinguish between two main forms of sex work: direct and indirect. Direct sex work refers to transactions in which there is a clear exchange of sex for profit. This includes street-based, whereby, “clients are solicited on the street, park, or other public places,” as well as escort and private services, where workers operate out of an establishment, such as their home or a hotel (Harcourt & Donovan, 2005, p. 202). Indirect sex work refers to a transaction in which it is not a distinct exchange of sex for a profit. This can refer to massage parlours or lap dances, in which the services provided do not exclusively or explicitly involve sexual contact (Harcourt & Donovan, 2005). For this paper, I will focus on the former: direct sex work, while considering the experiences of both street-based workers and indoor workers.

Background: the Bedford Case and Bill C-36

In the last decade, Canada has seen an evolution in the federal laws that aimed to eliminate sex work, without explicitly criminalizing it. Previous laws targeted the sex work industry by prohibiting virtually every activity related to it. These laws were founded in

the belief that sex work is a public nuisance, and it needs to be prevented (Department of Justice, 2017). However, rather than reducing the prevalence of sex work, the laws instead compromised the safety and security of sex workers. In 2014, three of these laws were brought before the Supreme Court of Canada (SCC) by Ontario sex workers, Terri-Jean Bedford, Amy Lebovitch, and Valerie Scott. During the court case, Chief Justice Beverly McLachlin stated that, “Parliament has the power to regulate against nuisances, but not at the cost of the health, safety, and lives of prostitutes,” (*R. v. Bedford*, 2013). As a result, the SCC declared the following prostitution laws unconstitutional: the prohibition on keeping or being in a “bawdy house” for purposes of prostitution, the prohibition on living on the avails of prostitution, and the prohibition on communicating in public for purposes of prostitution (Department of Justice, 2017). As a result, these laws were struck down, and Parliament was given one year to respond to these findings, otherwise, they would have been decriminalized altogether. In June 2014, Parliament introduced Bill C-36, also known as the *Protection of Communities and Exploited Persons Act (PCEPA)*, which became implemented by December 2014. This bill reflects a shift away from the attitude that sex work is a public nuisance, and instead views it as a form of sexual exploitation (Department of Justice, 2017). Consequently, neither conceptualization leaves space for sex work to be seen as legitimate. Bill C-36 introduced two new prohibitions which criminalize the purchase of sexual services and communicating for that purpose, as well as advertising for the sale of sexual services (2014). The rationale of these laws is that they will reduce the demand for the industry by discouraging buyers and limiting access to information about these services. Additionally, modifications were made to the prohibition on living on the avails of prostitution, whereby obtaining material or financial benefit from the commission of the transactions is prohibited, however, there are now exemptions. Those who are hired to ensure the safety and security of workers, such as bodyguards and managers, are now exempt from this material benefit offence (Bill C-36, 2014). While these laws appear to be less restrictive, they continue to perpetuate the notion that sex work is inherently bad, and that legal restrictions are necessary to protect society and/from sex workers.

Literature Review

Sociological research on the sex industry largely emphasizes the mechanisms by which prostitution laws have fostered an environment for sex workers that involves experiencing heightened risk, alienation from protective services, and stigmatization. The goal of these laws is to prevent the transaction from happening altogether, which is apparent in the previous laws that prohibited procuring and public communication for the purposes of prostitution (*Criminal Code*, 1985). This was argued to produce risks for sex workers, as it led to a rushed transaction process, where after meeting with a customer, sex workers would have to quickly escape public view to avoid being caught by law enforcement

(Krüsi et al., 2014). Communication with the client beforehand is important because it allows the sex worker to assess the safety of the client and establish a mutual agreement between parties regarding the price and services included (O'Doherty 2011). Without this process, Krüsi et al. (2014) explain that there are increased risks for violence, sexual assault, and HIV/STI's. Furthermore, by prohibiting communication for the purposes of procuring, sex workers are prevented from accessing and sharing information with other sex workers about effective safety practices. The law also previously prohibited owning, leasing, or occupying a bawdy house (*Criminal Code*, 1985), which is any establishment that is used for the exchange of sexual services. Such establishments are essential for sex workers' safety, as they provide spaces where they can carefully screen clients and record their information (Benoit, Jansson, Smith, & Flagg, 2017). These establishments also often involve a partnership amongst sex workers and security personnel, who are used to provide protection or support (O'Doherty, 2011). Ultimately, these prohibitions under the previous law contributed to the risks of violence, sexual assault, and the contraction of HIV/STI's, that sex workers may encounter in the industry.

In addition to increasing risk, the previous prostitution laws alienated sex workers from the protective services of police and health care professionals. The criminalization of the profession heightened policing of potential actors and subsequently increased workers' mistrust of law enforcement (Benoit, Jansson, Smith, & Flagg, 2017). While it is commonly believed that sex work is inherently dangerous and anyone who engages in it is likely to encounter instances of violence, one worker reported that she feared getting caught by law enforcement and being sent to prison, more than she feared the potential for experiencing violence (O'Doherty, 2011). Furthermore, the stigma associated with sex work made workers subject to heightened judgement and scrutiny from police. O'Doherty (2011) notes an incident of a sex worker who was not taken seriously in a court of law, because of her profession: "the judge leaned over and asked her, "are you aware of what the term, 'full-service' means?" The judge implied that she had brought the violence onto herself by not fulfilling her end of the contract" (p. 223). This legal case pertains to a woman who attempted to seek legal action after being violated by a client. However, rather than impartially assessing the details of the case, the judge criticized the sex worker by suggesting that it was her job to submit to the client, and therefore it was her fault when the client assaulted her after she said no. Situations like this are not uncommon, and they further alienate sex workers from protective services. Moreover, these challenges extend to accessing health care. From a Vancouver-based survey between 2006-2008, 49.6% of sex workers reported experiencing barriers to accessing health services in the last 6 months (Lazarus et al., 2012). Many workers have also reported incidences of denial of care, breaches of confidentiality, and disrespectful treatment, after disclosing their profession to their healthcare provider (Benoit, Jansson, Smith, & Flagg, 2018). The differential treatment that sex workers receive by both health care and the legal system is the direct result of the criminalization and subsequent stigmatization of their profession.

The resultant stigma is perhaps one of the most harmful effects of the criminaliza-

tion of sex work. Stigma may be conceptualized as the convergence of labelling, stereotyping, separation, status loss, and discrimination, in a power situation that allows them (Link & Phelan, 2001). The ‘whore stigma’ associated with sex work portrays workers as dirty and immoral, and victims of violence and poverty (O’Doherty, 2011). In a survey conducted in Vancouver between 2006-2008, 58.5% of respondents reported experiencing such stigma, as defined by hiding their status from friends, family, and/or their community (Lazarus et al., 2012). This is problematic because stigmatized individuals may internalize such words and judgements, and subsequently experience intense feelings of shame. “I mean you have to wrestle with terms like, ‘being a whore’ these are times where you have to look at yourself in the mirror and on your bad days, go ‘I’m nothing but a whore.’ And so, you wrestle with a lot of different things – the virgin/slut dichotomy...” expressed by one sex worker (O’Doherty, 2001, p. 231). Stigma has psychological, as well as social consequences for sex workers. Benoit (2005) explains that stigmatization increases workers’ vulnerability to psychological disorders such as depression and anxiety, as well as development of various diseases. Furthermore, O’Doherty (2011) reports findings from interviews with sex workers, where many have expressed that the stigma destroyed personal relationships with close friends and family.

As evident by the research on sex work in Canada, the criminalization of the industry has largely fostered a risky work environment, alienated workers from protective services, and stigmatized the profession. However, this research largely reflects data from when the previous prostitution laws were enacted. Since 2014, the implementation of the *PCEPA* has eliminated many of these previous laws and introduced new ones. The purpose of this research is to evaluate the effects of the *PCEPA* to gain insight into the relationship between the law and the experience of working in a stigmatized profession.

Methods

The criminalization and stigmatization of the sex work industry have largely driven it underground, which makes accessing the individuals who are personally involved in the business extremely challenging. This partially explains why current research on this population is largely limited. However, the reason for which this population is hidden, is exactly why more research is necessary. This population has historically been a victim of stigma and marginalization, which is largely attributable to the misunderstanding and misrepresentation of their profession. Sex work is often portrayed as immoral and deviant, and these negative attitudes have since formed the foundation of sex work laws. Therefore, in attempt to break the narrative around sex work, I consult sources that work closely with the population of interest and who can appropriately represent them, to highlight the issue that Canadian prostitution laws, both past and present, are consequential to the health, safety, and well-being of Canadian sex workers. My sample consists of online

publications from the websites of five sex worker advocacy groups across Canada. These groups work closely with sex workers and act as representatives for members of the industry. While other Canadian sex work organizations exist, many of them direct their focus toward providing resources for local sex workers, rather than actively publishing research and documents pertaining to the current status of sex work laws. As such, the following groups were selected for being the resources to best communicate the experiences of the target population: Pivot Legal Society (Vancouver-based), Chez Stella (Montreal-based), Maggie's (Toronto-based), and POWER (Ottawa-based), and the Canadian Alliance for Sex Work Law Reform, which is a coalition of Canadian sex work advocacy groups. The data includes eight published reports from the websites for the organizations themselves, along with two online news articles which feature a representative of Pivot Legal Society. Pivot Legal Society largely communicates through the media, wherein additional insight relevant to this topic is gained from these articles. All documents that were analyzed, save for one, were published in 2014 or later, reflecting the current perceptions of the prostitution laws. One document by POWER was published in 2010 and it was included because it offers additional insight into the ongoing struggles of sex workers. I employed a thematic approach to analyzing the documents, wherein I read through each document and noted key words that summarized each point. Upon review of these keywords, I categorized them into one of three themes that best represent the content in each of the documents. They are reflective of concerns with the sex work laws that were implemented in response to the Bedford Case in 2014. The themes are increased risk in the industry, alienation from police and health care services, and the stigmatization of sex workers.

Findings

Although the sources analyzed represent different demographics of sex workers across Canada, analysis of the online content published by five sex workers' advocacy groups nevertheless reflects a number of commonalities in the responses to the implementation of the *PCEPA*. These commonalities address concerns similar to those that were raised by the previous prostitution laws, which include the heightened risks in the industry, alienation from police and health services, and stigmatization. Additional criticisms were noted, suggesting that these effects are largely a consequence of the ongoing criminalization of the sex industry. I will review these findings while drawing on the previous literature regarding sex work in Canada, prior to the introduction of the *PCEPA*.

Increased Risk in the Industry

Prior to 2014, Canada's previous prostitution laws reportedly increased the risk for sex workers by prohibiting procurement, communication for the purposes of prostitution, and the establishment of bawdy houses. As a result, they were struck down and replaced by new laws under the *PCEPA*, that are supposedly less restrictive. The new laws are intended to alleviate the restrictions on the sellers by shifting the criminalization onto the buyers and third parties, whereby the purchase of sex and the advertisement of sexual services are now prohibited. However, throughout the analyzed documents, the most frequently raised concern is that these changes have either had no impact on, or actually increased, risks related to the profession. In a Vancouver-based survey, a quarter of the respondents reported that the *PCEPA* has had a negative impact on street-based working conditions, in addition to the 72.2% of respondents who reported that it has had no impact (McKeen, 2018). These new laws have failed to reduce the risks for sex workers because they continue to criminalize parties involved in the transaction, which promotes an environment that is conducive to harm, exploitation, and unsafe sexual practices. In particular, workers report ongoing difficulties with screening clients. Prior to establishing a deal with an individual, workers typically screen the potential client, as a precautionary measure before any official transactions are made. The screening process refers to evaluating a potential client to judge whether or not they are likely to be respectful of boundaries and adhere to the pre-established contract or agreement (Sanders, 2013). Screening is essential as it is a protective measure for the worker. However, this process is compromised due to the ongoing criminalization of the profession (Maggie's, 2015). Under the previous laws, the sellers feared arrest, and were motivated to rush the screening process to quickly establish an agreement with the buyer and get out of the view of public surveillance. Now, it is the clients and third parties who hold this fear, and thus rush the workers into agreeing to a transaction so that they can avoid being caught (Porth, 2018). Regardless of whether it is the buyer or the seller who is fearful of being caught by law enforcement, this fear is what motivates a rushed screening process which puts sex workers at risk for harm, exploitation, and contraction of HIV/STI's.

In addition to a compromised screening process, advocacy groups report that the *PCEPA* has decreased the client base. Criminalizing buyers deterred many of the worker's original clients, leading them to consider clients who they wouldn't normally accept, or agree to conditions that they wouldn't ordinarily be comfortable with (Canadian Alliance for Sex Work Law Reform, 2014). Furthermore, the reduced client base increases the displacement and isolation of street-based workers (Pivot Legal Society, 2014). Potential clients will avoid heavily surveilled areas, which forces workers to go to more secluded and risky areas, in an attempt to find clients (Canadian Alliance for Sex Work Law Reform, 2014). Subsequently, Pivot Legal Society (2014) reported an increase of sex work areas in industrial zones. This is problematic in that it increases street-based workers' vulnerability to harm (Canadian Alliance for Sex Work Law Reform, 2017). Indoor sex

workers also reportedly experience more risks as a result of the *PCEPA*. Third-party involvement in sex work is criminalized, thus discouraging safety mechanisms, such as drivers, security personnel, or bookkeepers (Canadian Alliance for Sex Work Law Reform, 2014). Stella (2014a) criticizes this law, asserting that sex workers need the option to employ such personnel for protection and help in seeking out clientele. Moreover, many street-based and indoor sex workers now receive lower incomes, as clients no longer want to pay the higher rates now that they bear the burden of criminalization (McKeen, 2018).

Alienation from Police and Health Care Services

Not only are sex work advocacy groups reporting increased risks in the industry, but one of the most frequent themes present among the analyzed documents is centered around the continued alienation of sex workers from police and health care services. These groups repeatedly indicate that the *PCEPA* has maintained the unfavourable relations between workers and the protective services of law enforcement and health care because it perpetuates the stigma that is attached to sex work and continues to invalidate the profession. According to a survey conducted by the Centre for Gender and Sexual Health Equity, 25% of respondents said that the new law has made it harder to access health and safety measures (McKeen, 2018). This is ironic, as the *PCEPA* was modelled under the idea that women are, “inherently vulnerable and in need of protection” (Stella, 2014a). If these women are so vulnerable, why are they being discriminated against when they try to seek protection? Stella (2014b) argues that rather, “the bill denies women of their agency as rational decision-makers, as it is laden with the belief that no one would choose this profession” (p. 4). However, pro-sex work perspectives view the profession in a positive light, arguing that it is empowering for those who choose to engage in it (Jones, 2016). The rationale behind this is that sex work puts the workers in control of their own body and sexuality, while additionally enhancing their confidence and assertiveness (Jones, 2016).

Moreover, by perpetuating the hostile relationship between law enforcement and sex workers, there continues to be a significant under-reporting of violence (Canadian Alliance for Sex Work Law Reform, 2017; Porth, 2018). While sex workers are no longer being directly penalized under the law, they still fear arrest, abuse, and misconduct by police. Bruckert & Chabot (2010) describe reports from sex workers of public harassment, verbal abuse, and physical and sexual assault from law enforcement officers. Additional comments from the Canadian Alliance for Sex Work Law Reform (2017) note that there has been an increase in police surveillance of racialized sex workers, since the enactment of the *PCEPA*. Presumably, this is partially because of the differential impact that the laws have had on street-based sex workers compared to indoor sex workers. Regarding demographics, indoor workers are more commonly white individuals, while street-based workers consist of higher non-white populations (Ratchford, 2013). However, the new laws are designed to benefit indoor sex workers more than street-based workers, due to

their different work environments. For indoor workers, their work environment protects them from the surveillance of law enforcement, but street-based workers lack an equivalent private space and instead remain visible to law enforcement. Therefore, the high proportion of racialized individuals involved in street-based sex work are more vulnerable to police surveillance, not only for their profession, but also the position that they hold in society (Ratchford, 2013). Other advocacy groups have been additionally reported on the differential experiences of sex workers. In particular, Indigenous, black, transgender, and migrant workers face additional stigmatization and are especially targeted by law enforcement, not only for working in a discredited industry, but also for being part of a minority group. The risky working conditions and stigmatization of sex workers continue to increase health risks, which are magnified by their continued barriers to accessing appropriate health care. A report by Bruckert & Chabot (2010) included a quote from a sex worker who recounted her experience after being assaulted by a client, “I ended up just sticking my piece of gum in the hole in my head. I wasn’t gonna go to the hospital either; they don’t treat you well there. I took care of myself. I did what I had to do” (p. 30). As long as their profession is criminalized, workers face discrimination and alienation from police and health care services.

Stigmatization of Sex Workers

The *PCEPA* continues to criminalize the sex industry, which reflects the ongoing stigmatization of sex work. This concern is repeatedly raised across the documents from the different sex work advocacy groups and is therefore the third theme of analysis. In particular, the Canadian Alliance for Sex Work Law Reform (2017) indicates that it has actually contributed to increased stigmatization and discrimination against both the sellers and the buyers. The maintained discourse around sex work is that it is an immoral and distasteful profession, and the language used to refer to sex workers often involves dehumanizing terms such as ‘whore’ or ‘slut’ (Bruckert & Chabot, 2010). Research repeatedly shows that stigma is linked to lower self-esteem, feelings of disempowerment, and lower reports on quality of life measures (Benoit, Jansson, Smith, & Flagg, 2018). The experience of stigma also has detrimental effects on physical and mental well-being by increasing risk for chronic pain, high blood pressure, elevated cortisol output, mood and anxiety disorders, and increased suicidality (Fitzgerald-Husek et al., 2017). While this is similar to what was seen prior to the *PCEPA*, advocacy groups are emphasizing the differential stigmatization of sex workers. It is unclear whether this increasing concern is because this issue has worsened as a result of the new laws, or if this is attributable to a shift in awareness and discussion regarding the differential stigmatization and discrimination against individuals based on the particular social position that they hold in society. Regardless, previous research on the criminalization of sex work focused less on the disproportionate stigmatization of sex workers, compared to current voices. Maggie’s (2015) stresses the additional oppressions that sex workers may experience, based on their race, socioe-

conomic status, sexual orientation, and possible substance use. Consideration must be given to not only the consequences of the stigmatization of sex work, but how stigma is experienced differently by different individuals.

Conclusion

Sex work is a highly contentious topic in Canadian society. Lawmakers maintain legal regulations around prostitution in attempt to prevent it altogether. Sex work itself was never criminalized, but previously, virtually every activity associated with it was. Research has demonstrated that this criminalization was consequential to sex workers as it increased their vulnerability to violence and abuse, fostered an unfavorable relationship with police and health care providers, and magnified the stigmatization of the profession. In 2013, the *Attorney General of Canada v. Bedford* legal case transpired, where the Supreme Court deemed three prostitution laws unconstitutional, and they were struck down. (*The Protection of Communities and Exploited Persons Act (PCEPA)*), was subsequently introduced in 2014, which made the purchase of sex illegal. The idea behind this act was that by penalizing the clients, it would discourage buyers, and ultimately reduce involvement in the industry. However, analysis of online reports and news articles by five sex work advocacy groups revealed that not only has the *PCEPA* failed their goal of reducing the prevalence of sex work, but the consequences of criminalization have been perpetuated and elevated, which I explored through three dimensions. First, sex workers report engaging in riskier transactions, due to difficulties screening their clients, as well as having a reduced client base. The reduction in prospective buyers forces sellers to consider conditions that they may not ordinarily be comfortable with. Second, workers are still often scrutinized and discriminated against when seeking protective services, such as from law enforcement and health care providers. Finally, the stigmatization of the industry continues to haunt sex workers in many aspects of their lives. The ‘whore stigma’ perpetuates the stereotypes of these individuals as being deviant, dirty, and a public nuisance which is shown to be devastating to one’s psychological and physical wellbeing. The overwhelming assertion from sex worker advocacy groups is that sex worker rights are human rights, and as of today, these rights are not being met.

References

Bill C-36, *Protection of Communities and Exploited Persons Act*, 2nd session, 41st Parliament, Ottawa, Ontario, 2014.

- Benoit, C., Jansson, S. M., Smith, M., & Flagg, J. (2018). Prostitution stigma and its effect on the working conditions, personal lives, and health of sex workers. *The Journal of Sex Research*, 55(4-5), 457-471. doi:10.1080/00224499.2017.1393652
- Benoit, C., Jansson, M., Smith, M., & Flagg, J. (2017). “Well, it should be changed for one, because It’s our bodies”: Sex workers’ views on Canada’s punitive approach towards sex work. *Social Sciences*, 6(2), 52. doi:10.3390/socsci6020052
- Benoit, C., Jansson, M., Millar, A., & Phillips, R. (2005). Community-academic research on hard-to-reach populations: Benefits and challenges. *Qualitative Health Research*, 15(2), 263-282. doi:10.1177/1049732304267752
- Bruckert, C., & Chabot, F., in collaboration with POWER. (2010). *Challenges: Ottawa area sex workers speak out*. Crawford, G.
- Canadian Alliance for Sex Work Law Reform. (2017). *Safety, Dignity, Equality: Recommendations for Sex Work Law Reform in Canada*. Canada.
- Canadian Alliance for Sex Work Law Reform. (2014). *Criminalizing of the Purchase of Sex: Impacts and Consequences*. Canada.
- Criminal Code*, R.S.C., C-46 (1985). Retrieved from <http://laws.justice.gc.ca/en/C-46/index.html>
- Department of Justice. (2017). *Technical Paper: Bill C-36, Protection of Communities and Exploited Persons Act*. <https://www.justice.gc.ca/eng/rp-pr/other-autre/protect/p1.html>.
- Fitzgerald-Husek, A., Van Wert, M. J., Ewing, W. F., Grosso, A. L., Holland, C. E., Katterl, R., ... Baral, S. D. (2017). Measuring stigma affecting sex workers (SW) and men who have sex with men (MSM): A systematic review. *PloS One*, 12(11), doi:10.1371/journal.pone.0188393
- Harcourt, C., & Donovan, B. (2005). The many faces of sex work. *Sexually Transmitted Infections*, 81(3), 201-206. doi:10.1136/sti.2004.012468
- Jones, S. H. (2016). “I See Myself as a True Healer”: A Study of Self-Empowerment Among Indoor Female Sex Workers. *Sex Work and Female Self-Empowerment*. Routledge, Taylor & Francis Group. doi:10.4324/9781315545561
- Krüsi, A., Pacey, K., Bird, L., Taylor, C., Chettiar, J., Allan, S., ... Shannon, K. (2014). Criminalisation of clients: Reproducing vulnerabilities for violence and poor health among street-based sex workers in Canada—a qualitative study. *BMJ Open*, 4(6), e005191-e005191. doi:10.1136/bmjopen-2014-005191
- Lazarus, L., Deering, K. N., Nabess, R., Gibson, K., Tyndall, M. W., & Shannon, K. (2012). Occupational stigma as a primary barrier to health care for street-based sex workers in Canada. *Culture, Health & Sexuality*, 14(2), 139-150. doi:10.1080/13691058.2011.628411

- Link, B. G., & Phelan, J. C. (2001). Conceptualizing stigma. *Annual Review of Sociology*, 27(1), 363-385. doi:10.1146/annurev.soc.27.1.363
- Lutnick, A., & Cohan, D. (2009). Criminalization, legalization or decriminalization of sex work: What female sex workers say in San Francisco, USA. *Reproductive Health Matters*. 17(34), 38–46. doi:10.1016/S0968-8080(09)34469-9.
- Maggie's. (2015). *About: Decriminalization of Sex Work as Harm Reduction*. Toronto, ON.
- McKeen, A. (2018, November 9). How a Canadian law meant to protect sex workers is making it harder for them to stay safe. *The Star*. Retrieved from <https://www.thestar.com/vancouver/2018/11/08/how-a-canadian-law-meant-to-protect-sex-workers-is-making-it-harder-for-them-to-stay-safe.html>.
- O'Doherty, T. (2011). Criminalization and off-street sex work in Canada. *Canadian Journal of Criminology and Criminal Justice*, 53(2), 217-245. doi:10.3138/cjccj.53.2.217
- Pivot Legal Society. (2014). *Sex Workers and Bill C-36: Analysis based on Social Science Evidence*. Canada.
- Porth, K. (2018, January 30). Kerry Porth: Why feminism must include the fight for sex workers' rights. *The Georgia Straight*. Retrieved from <https://www.straight.com/news/1026066/kerry-porth-why-feminism-must-include-fight-sex-workers-rights>.
- Ratchford, S. (2013, December 19). Canada's Sex Work Laws Are Dangerous, Racist, and Classist. *Vice*. Retrieved from https://www.vice.com/en_ca/article/qbnenm/canadas-sex-work-laws-are-dangerous-racist-and-classist.
- R. v. Bedford*, 2013 SCC 72.
- Sanders, T. (2013). Chapter Four: Picking Punters. In *Sex work: A risky business*. Willan Publishing.
- Statistics Canada. (2016). Prostitution offences in Canada: Statistical Trends. *Statistics Canada Catalogue* no. 85-002-X. (accessed October 6, 2019).
- Stella. (2014a). *Submission to the Senate Committee on Legal and Constitutional Affairs: The Protection of Communities and Exploited Persons Act (Bill C-36)*. Montreal, QC.
- Stella. (2014b). *Bill C36: What you need to know about the proposed law on sex work*. Montreal, QC.