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Sexual Politics:

# Prostitution The Swedish or the Dutch model?

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**Recent years have seen renewed debate about prostitution in European countries. Both the Swedish and the Dutch models have been in effect for over 10 years and a lot of research has been done on the various implementations. What are the opinions and results?**

## Different models

There are of course countless opinions about prostitution. Most of these are problematic because they are based on myopic, selfish or conservative thinking, or on abstract theory far removed from the real-life situation. There are a few models that try to take reality into account and to improve on it. These can be roughly divided into two tendencies: the harm reduction and the harm elimination model.

I'll take a short look at both models and then present the actual implementations in Sweden and the Netherlands. The Dutch paper Volkskrant had an article where a quite pessimistic author opines that both the Dutch and Swedish models have failed. [1] Luckily that's not entirely true.

### *Present-day reality*

To summarize: most prostitutes are in a very precarious situation. The majority of prostitutes have post-traumatic stress disorder (PTSD). [2] 65% to 95% of those in prostitution were sexually assaulted as children, 75% were homeless at some point in their lives, 85-95% want to escape prostitution but see no way out or have no other options for survival. For the majority, the age of entry into prostitution is below 18.

There is an enormous range of forms of pressure and manipulation by pimps on women and girls to "prepare" them for prostitution. [3] Prostitutes deal with a lot of additional violence from pimps, customers ("johns") and sometimes the police. The mortality rate of prostitutes is extremely high – 10 to 40 times higher than the average population. [4] In one study a cohort of 1969 prostitutes was followed during a period of thirty years. Violence was the leading cause of death, most violence was committed by clients. [5] Other studies show similar statistics.

Today we have reasonably accurate and replicated research about prostitution, though numbers in trafficking are still difficult to estimate. Several studies with multiple hundreds of research subjects in different countries exist [6]], e.g. one study with 845 people in 9 countries indicates 71% of prostitutes have encountered physical violence in prostitution, 62% have been raped and 89% wanted to leave but didn't see a way out or another option to survive.

Meanwhile, on the other side, there are lots of very popular websites where men can review prostitutes they use, explain what "services" they do, whether they can be pushed to have sex without condoms or anal, etc.. [7] Remarkable is also that the men criticize prostitutes who don't look like they enjoy it, who do not play pretend well enough. Male demands have slowly become more extreme, e.g. many demand of prostitutes exhausting, painful and often damaging moves they learned from watching pornography. [8]

### *Harm reduction*

The first major model is harm reduction. Here prostitution is considered more or less a constant in societies. The

prevalence of prostitution – how often and how many men go to prostitutes – will remain more or less constant because “it” (what precisely?) is a natural male drive. [9]

Assuming this, the way forward is trying to improve the conditions: easy or free access to condoms, HIV testing, and the legal recognition of prostitution and pimping as work. Included are also attempts to lessen the additional violence: less violence done by pimps and johns, with the state keeping an eye out – and earning money on the back of the prostitutes.

Harm reduction usually comes from a (neo-)liberal view of society: the human as an individual that makes free choices, “there is no such thing as society”. In this view it's possible to make a clear-cut distinction between forced and voluntary prostitution. When people choose it, then it's a job like any other. This is linked to human trafficking: trafficking is always problematic, prostitution not necessarily. The goal becomes quite simple: make voluntary prostitution easier, ban forced prostitution. [10] This is the approach that has been implemented in the Netherlands since 1999-2000.

### ***Harm elimination***

The second model is harm elimination, implemented in Sweden since 1998-1999. Harm elimination stems from a feminist vision whereby prostitution is seen as:

1. In itself a form of violence against women;
2. A phenomenon that is not fixed, of which the prevalence can change through time;
3. A system which helps maintain violence against women;
4. A signal that it is acceptable that a subset of women are sacrificed and can be bought and sold.

Note that the view of choice is very different in this model compared to harm reduction: in a capitalist and patriarchal society, it is utterly predictable that women will see prostitution as a viable alternative or the only way out of e.g. poverty. Nevertheless, the amount of women that go to prostitution out of their own volition and are not forced into it is a small percentage. [11]

In the harm elimination model, prostitution is a harmful system and reality that needs to be abolished, just like other forms of violence against women and slavery.

This model cannot exist without resources dedicated to education, exit programmes and job retraining. Typical is also recognition of the power inequalities between prostitute and john and a demand that johns make different choices. Selling sex is made legal – to make sure prostitutes cannot be arrested or blackmailed – and buying sex is illegal: the customer needs to stop abusing his power and make better choices. This critical focus on the choices of the customer-abuser is a relatively new paradigm for thinking about prostitution. [12]

Before this, the debate was caught in a dichotomy about the choice of the prostitute: she was either an immoral, evil person in the conservative view or a free sexual agent, liberated from conservative norms, as the liberals would have it. In any social analysis, it is important never to lose sight of the power relations (who has the most power?), otherwise they tend to disappear.

## Effects in The Netherlands

In 2000 the laws against brothels and pimping were struck. These forms of prostitution – but not all others – became legal.

Prostitution has become normalised in Dutch society to the point where *De Wallen* – the place in Amsterdam where window prostitution is concentrated – is now a famous attraction for both tourists and native inhabitants. Schools bring children on trips through the neighbourhood. Official university guides for students advertise working in sex lines to make the money needed for paying university education. Job offers for prostitution are placed next to other job openings and there are several incidents where women had their unemployment pay rejected because they refused a job for which they qualified: prostitute.

Lately, this consensus of acceptance has been broken and more and more people are questioning the results of the model. Through the years many problems surfaced. After legalisation the *illegal* forms of prostitution increased spectacularly and, contrary to expectations, human trafficking did not decrease – not even to the official brothels supervised by the state. The police themselves have had to admit in their report that despite earlier positive news, the approach isn't working :

*It's an illusion to think a normal, clean industry has been created. In the legal window prostitution of Amsterdam, Alkmaar and Utrecht human traffickers, pimps and body-guards have had free rein for years. [13]*

They estimate that between 50% and 90% of women working in legal brothels arrived there via trafficking.

It became more difficult to tackle illegal prostitution because it was organised by people who were now, by law, businessmen like any other. These legal pimps also lobby for changes in laws like other businessmen, are sometimes invited to parliamentary discussions etc. Victims of trafficking were found in all brothels including the supervised legal brothels. The legalisation became a laundry operation on a scale never seen before: all these criminals were now simply businessmen who paid taxes and were left alone for the most part.

The clean dichotomy of the harm reduction model between freely chosen and forced prostitution didn't match reality. The police who oversee the brothels are often shaken by what they see:

*In her book (...) Ruth Hopkins (2005) explains the view of (anonymous) Dutch policemen. They are angry and state that "the daily confrontation with women who are really being raped is something we can't take any more". [14]*

One police officer who was struggling with a crisis of consciousness was fired because his research into the murder of a prostitute was shining a negative light on the police and the legalisation. Professor and columnist Evelien Tonkens called it in the paper *Volkscrant*, "The bankruptcy of comfort feminists who think rape for pay is sexual liberation. And of other liberals who think everything valuable should be sold." [15]

The documentary *Not For Sale* [16] for example shows a pimp active in the Netherlands and Germany explaining, without hesitation, that he wants to expand his business to 500 brothels. Prostitutes and former prostitutes in the same documentary tell stories about their experiences and their inhumane treatment by pimps and johns.

Politician Karina Schaapman talks about the problems in her book *Visiting prostitutes isn't normal – doubts about a liberal approach to prostitution* [17]:

*I want to use public actions to demonstrate the responsibility of the john. He is maintaining prostitution. The government plans to regulate prostitution but it doesn't know the sector and overestimates the customer. The majority of women works involuntary. All research demonstrates this. But the prevailing mentality is: this is annoying, but these women are strong, they enjoy it or freely choose it. TV reinforces this fairytale. From experience: this strong woman is one single exception at the top. [18]*

Since many prostitutes are murdered and most of the murderers are their clients, it would seem the government might indeed be overestimating the customer a bit. These are also the same customers that have no trouble abusing minors, often hit prostitutes, and then rank them on websites according to how well the women can act. Overestimating just a bit, then.

As an aside, the same effects of legalisation can be seen in other countries, e.g. in Australia [19]: rising profits and rising abuse, no exit strategies, organised crime heavily profiting from the situation. Prostitutes themselves have not benefited: they are in the same precarious position as before with the same trauma and violence.

## Effects in Sweden

The Swedish model was from the start not just a set of proposals – legalising the prostitute, criminalising the customer – that all of a sudden became law. The changes were proposed by women's groups and stem from a clear human rights approach. On 1 January 1999 the buying of sexual services officially became a crime [20]:

*After several years of public debate initiated by the Swedish women's movement, the Law that Prohibits the Purchase of Sexual Services came into force on January 1, 1999. The Law is the first attempt by a country to address the root cause of prostitution and trafficking in beings: the demand, the men who assume the right to purchase persons for prostitution purposes. This groundbreaking law is a cornerstone of Swedish efforts to create a contemporary, democratic society where women and girls can live lives free of all forms of male violence. In combination with public education, awareness-raising campaigns, and victim support, the Law and other legislation establish a zero tolerance policy for prostitution and trafficking in human beings. [21]*

Did Sweden suddenly become a paradise where everyone lives in peace and happiness and there is no more poverty or sexism? No, of course not. But the situation is better than before.

There is less trafficking into Sweden. There are fewer men who visit prostitutes. The number of prostitutes has decreased since 1999, whereas in other countries the number has increased. [22] Swedish society no longer accepts the behaviour of customer-abusers.

Opponents to abolition usually say this approach stems from a right-wing, conservative view. In Sweden however this is not the case. Kvinnofronten, the national organisation for women's shelters had put this on the political agenda in 1987; in 1994 the number of women in parliament rose from 27% to 45% and a left-wing majority came to power. [23]

The law that came into effect was part of a broad initiative against violence against women. A budget was made available to effectively follow up cases, provide exit strategies and job retraining for prostitutes, and effectively prosecute criminals.

More and more countries look to the Swedish model as an alternative for a failing policy of tolerance (like in Belgium) or a failed legalisation (like in the Netherlands). Norway and Iceland have adopted a similar policy, which is also

expected to become law in France. In the European parliament a proposal for gender equality was made which also included a harm elimination approach to prostitution: this too came from the European left. [24]

## Power and criticism

Criticising legalisation is not without repercussions: next to the police officer that was fired for being too critical, there's also Dutch politician Myrthe Hilkens. She began to receive death threats for simply being critical of legalisation and considering a look at the Swedish model. [25] Unfortunately this is no exception. Another feminist who shall remain anonymous even had to leave her country because of the vicious attacks on her for her activism.

Although we cannot judge the rightness of our actions based on the reactions of the opponents, it is important: what does it mean when people who are in favour of a harm elimination model are threatened this way? It brings to mind Voltaire's *"To learn who rules over you, simply find out who you are not allowed to criticise."*

These debates do not take place in a neutral context, they are more like a football match played on a hill. Human trafficking and prostitution are billion-dollar businesses, something often forgotten because of the nature of the sector. The people who profit from these industries take steps, which have very negative effects, to protect and maximize their profits. Attacking prostitution means attacking one of the worst pillars of patriarchal and capitalist society.

Lives are at stake and a lot of effort is made to sabotage the debate. The term sex work is not just the new word for prostitutes; pimps, too, call themselves sex workers, and use this to present themselves as common workers, "one of you". In the meantime they influence the debate, lobby for laws and write, and promote, magazines and books. [26] In the Netherlands there's a sex worker glossy funded by pimps.

## Frequently Asked Questions

*Doesn't prostitution help prevent violence against women?*

No. There is not a single piece of research that confirms this idea.

This argument is problematic on all sides: firstly, it makes the assumption that all men are beasts by nature, who only have two choices: either rape women without payment or pay for it – which is then supposedly the lesser evil. There is an alternative: the view that in a more egalitarian society with a healthier view of sexuality and power there will be less violence against women. Secondly, it almost seems a form of blackmail, meaning: you better not abolish prostitution, *or else...* ("You're not going to take our prostitutes away, you feminists!" screamed an angry man at me in a bus once). Thirdly, even if we would take this wrong assumption as true it is still not acceptable to create a certain class of women that need to deal with these male problems so other women can be safer.

The opposite is true: there is a lot of violence against women both in and outside prostitution and violence against women is normalised by the existence of this system.

*How can you be opposed to the world's oldest profession?*

What is the oldest profession? Stone sharpener? Slave trader? A woman trading her body for a nice piece of fresh mammoth meat? As columnist Saskia De Coster put so eloquently [27], *It's the oldest profession so... So? A historical argument of the same validity as those preferring cooking pots made of tin or slavery: we've been doing this for centuries, never change a winning team.* The European Women's Lobby agrees: *We do not say "murder has been around forever: we cannot do anything about it". Look at the death penalty or slavery for example.* [28]

This remark is used to silence the debate, it's not a real argument. Besides, how do we know what is the world's oldest profession? How do you define profession? With most definitions you'd have to agree food gatherer would be the oldest profession, though it is true that as far as we know slave trade was introduced quite early in human history. [29]

*Doesn't everyone have a right to sex?*

Yes, everyone has the right to sex with themselves – something which really should be promoted a lot more. With others: no, that's not a right it's a privilege [30]. If that is frustrating: too bad. Someone's frustration is not more important than other people's boundaries.

In current reality however, sex is indeed a right for men. That is precisely what sexism really is: that we think it's normal that men can buy a woman to use, anywhere, any time. Prostitution is a very normal phenomenon within capitalism: increasing commodification means ultimately everything is made into a product that can be bought. When viewed this way, prostitution is the ultimate normal sex which aligns perfectly with capitalist paradigms. As leftists and feminists we should realize that is not something to celebrate.

*Aren't people opposed to prostitution simply prudes?*

When someone calls you a prude, you have already won – it means they have no real arguments left. Using words like slut or prude do not fit in an intellectually honest debate. It is quite typical that in a patriarchal society, people who oppose the right of men to buy and abuse women would be called prudes.

Many feminists are of the opinion that prostitution, human trafficking and violence are an enormous obstacle for sexual liberation.

There are of course conservatives opposed to prostitution, as there are those who defend it. The current pope for example is praising the Dutch model. [31] This is however not a game of who has fewer conservative nutcases on their side.

*Won't prostitution simply go underground when you criminalise it?*

Ironically, this "going underground" happens in countries with legalisation, like the Netherlands, Australia and Nevada. In a country like Sweden, prostitution has actually decreased. The mistake is thinking that prostitution will always remain at the same level of prevalence – which is simply not true.

One also has to analyse what it would mean for something to "go underground". There's no secret cellar somewhere – knock five times on the door – where all the real prostitution is happening. Somehow, magically, this location can be found by any customer with an erection but not by the police.

However, you can assume that pimps are simply after money. They want as many opportunities as possible to sell or rent their products, and thus they should be easy to find. The police should be able to find any customer that pimps can find. Naturally, that requires the political will and the necessary resources.

*What about labour unions? Shouldn't we promote unions for prostitutes?*

When people who are oppressed try to organise themselves, this is a very positive thing that feminists always support. The currently existing unions aren't doing much good. The one in the Netherlands is very small, and the one in Germany even has only a membership rate of 0,04% of prostitutes.

*Does abolition mean we are denying the agency & opinion of the prostitutes?*

No. First of all, the opinion of prostitutes is important but they too differ wildly in their opinions on the right course to take. [32] There is not a single "opinion of prostitutes" about what to do. Secondly, there is no research at all which backs up legalisation, which, admittedly, would seem like a good and simple idea for many. Too bad that it hasn't worked in one single country where it has been attempted. The results have been uniformly disastrous so we need a different model, no matter what those that still believe in it think.

Thirdly, I would posit that by now prostitutes are used – once again – by all sides who simply trump up prostitutes to back up their opinion. The way in which prostitutes are once again used as instruments for politics is frankly becoming alarming.

But in case someone insists, let's take a look at the opinions of prostitutes. [33] In any study, about 85-95% of them want to quit but see no way out. The Swedish model helps women who want to escape. The Dutch model keeps women in prostitution, but we can all rejoice because now it's a job like any other. We don't see these women in the media very often. The media has apparently decided the real titillation is in the story of the happy hooker.

Plus, in a system that causes the death and harm of so many, do we focus on the agency of some small percentage of privileged individuals or on a critique of the system? Any other sector with violence has people to defend it. Not everyone wanted slavery in the US abolished: slaves got food and a place to live from their masters, so... Labour unions in Belgium once defended the continued existence of a weapons factory selling to dictators the world over – otherwise the workers would be out of a job. The barbaric practice of using little people for fun and amusement in inhumane games was historically defended too, they too didn't want to lose their job. And so on.

## Conclusion

The results are in: legalisation, in any country it's been implemented, ensures more money for big business, more prostitution, and less protection for prostitutes. Legalisation is a problem precisely because it ignores the enormous differences in power between traffickers, pimps and johns versus prostitutes. Legalisation does indeed bring more freedom: the freedom for traffickers and pimps to make even more profits from organised rape.

The alternative attempted in Sweden has demonstrated that actual improvements are possible. It may not be perfect, it may be only the least bad of a series of alternatives, it's still an enormous progress for those who risk their lives every day trying to survive. January 1st, 1999: write it on the walls, tattoo it on your arms: it's the beginning of the end for the neoliberal vision that makes products of us all, products to be bought, used and discarded. This is a new era for feminism and the struggle against exploitation of women.

## Prostitution The Swedish or the Dutch model?

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One day we will live in a world where people will look back on the existence of prostitution as a societal harm almost impossible to understand, and they will view prostitution for what it really is: a modern form of slavery.

First published on Evie Embrecht's [blog](#). Translation by the author.

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[1] [Volkskrant \(in Dutch\)](#).

[2] Summary: 68% of 854 people in strip club, massage, and street prostitution in 9 countries met criteria for posttraumatic stress disorder or PTSD. <http://www.prostitutionresearch.com/Prostitution%20Quick%20Facts%202012-21-12.pdf> ; *Prostitution & Trafficking in Nine Countries: An Update on Violence and Post-Traumatic Stress Disorder*. Farley, M., Cotton, A., Lynne, J., Zumbeck, S., Spiwak, F., Reyes, M.E., Alvarez, D., Sezgin, U. 2003. Available [online](#).

[3] Joe Parker, How Prostitution Works. Published in *Not For Sale – Feminists Resisting Prostitution and Pornography*, 2004, Christine Stark & Rebecca Whisnant [eds] and available [online](#).

[4] Everyone dies, so taken that way “mortality rate” is of course 100%. What we mean is: say that in the average population in a cohort of 1000 people of a certain age range e.g. 5 die in a given year. For the category of prostitutes this number is 10-40 times higher, e.g. 50-200 die in a given year.

[5] John J. Potterat, Devon D. Brewer, Stephen Q. Muth, Richard B. Rothenberg, Donald E. Woodhouse, John B. Muth, Heather K. Stites & Stuart Brody, 2004. Mortality in a Long-term Open Cohort of Prostitute Women. *American Journal of Epidemiology*, Vol. 159, No. 8. Available [online](#).

[6] *Prostitution & Trafficking in Nine Countries: An Update on Violence and Post-Traumatic Stress Disorder*. Farley, M., Cotton, A., Lynne, J., Zumbeck, S., Spiwak, F., Reyes, M.E., Alvarez, D., Sezgin, U. 2003. [Online](#); Zimmerman, C., et al. (2006). *Stolen Smiles. The physical and psychological health consequences of women and adolescents Trafficked in Europe*. The London School of Hygiene and Tropical Medicine. London 2006.

[7] See [for example](#) for the Netherlands.

[8] From stories of prostitutes in The Netherlands: *Hoerenlopen is niet normaal – twijfels bij een liberaal prostitutiebeleid*. 2007. Karina Schaapman. Uitgeverij Balans;  
From stories of prostitutes in Belgium, research by author, partially published in “The Big Debate: Prostitution as Human Trafficking”, Evie Embrechts & Peggy Van Der Auwera. *GDL Magazine*, 2013. Available [online \(in Dutch\)](#). Note that the author was not responsible for the typical sensational pictures and titles and has distanced herself from this approach.

[9] One has to wonder: if this is such a natural drive, what's wrong with all the men who *don't* visit prostitutes. Do they need therapy or medication? Usually it's not specified what exactly is this natural drive: Sex? Power? Abuse?

[10] The goals are summarized in the police report of KLPD (Korps Landelijke Politiediensten) – Dienst Nationale Recherche (July 2008). *Schone schijn, de signalering van mensenhandel in de vergunde prostitutiesector*. Driebergen, Nederland.

[11] See e.g. the summary of research: *Prostitution's Hierarchy of Coercion*, 2008, meta-analysis by Melissa McFarley, available [online](#).

[12] Many thanks to Samantha Berg for first explaining this new paradigm to me. See [here](#).

[13] KLPD (Korps Landelijke Politiediensten) – Dienst Nationale Recherche (July 2008). *Schone schijn, de signalering van mensenhandel in de vergunde prostitutiesector*. Driebergen, Nederland (our translation); Karin Werkman, 2009. *Sex trafficking in Europe: Prostitution regimes and trafficking victims*. Thesis voor MSc Humanitarian Action, University College Dublin.

[14] Werkman, 2009.

[15] Our translation. Dutch quote: "Het failliet van comfortfeministen die verkrachting tegen betaling aanzien voor seksuele bevrijding. En van andere liberalen die alles van waarde verhandelbaar achten." [here](#).

[16] European Women's Lobby. The DVD is for sale, the film is also available [online](#).

[17] *Hoerenlopen is niet normaal – twijfels bij een liberaal prostitutiebeleid*. 2007. Karina Schaapman. Uitgeverij Balans.

[18] Our translation. Original [here](#).

[19] Mary Sullivan, 2005. *What Happens When Prostitution Becomes Work?*. Coalition Against Trafficking in Women, Australia.

[20] Gunilla Ekberg, 2004. "The Swedish Law That Prohibits the Purchase of Sexual Services", *VIOLENCE AGAINST WOMEN*, Vol. 10 No. 10, October 2004, pp 1187-1218.

[21] Gunilla Ekberg, "The Swedish Law That Prohibits the Purchase of A Sexual Service: Best Practices for Prevention of Prostitution and Trafficking in Human Beings", updated version of the article with the same name of 2004.

[22] Ekberg, update of 2004 article.

[23] See also "Abolishing Prostitution: The Swedish Solution – An Interview with Gunilla Ekberg". *Rain and Thunder: A Radical Feminist Journal of Discussion and Activism*, Issue 41, Winter Solstice 2008. Available [online](#).

[24] Gender Equality Report, Cristina Zuber, 2014.

[25] 'Hilkens ernstig bedreigd omwille van verbod hoerenbezoek', 22/02/13, [De Volkskrant](#).

[26] The layer of "happy hooker" glamour is thin – if you read e.g. the supposedly fabulous story of Jenna Jameson, *How to make love like a porn star*, you see a tale of abuse and grooming of an under age girl.

[27] Belgian newspaper *De Morgen*, 02/11/2013, Saskia De Coster, [online](#).

[28] Also see *18 myths on prostitution*, 2014, European Women's Lobby. Online [here](#).

[29] Bindel, J. and Kelly, L. (2003). "A critical examination of responses to prostitution in four countries: Victoria, Australia; Ireland; The Netherlands; and Sweden", Child and Woman Abuse Studies Unit, London Metropolitan University. Via Karin Werkman, 2009. *Sex trafficking in Europe: Prostitution regimes and trafficking victims*. Thesis for MsC Humanitarian Action, University College Dublin.

[30] I am reminded of this funny [article about rights versus privileges](#).

[31] See [here](#).

[32] *Feminist Current* "[On listening to sex workers](#)".

[33] Ibid.