

Is Trafficking in Human Beings Demand Driven?

A Multi-Country Pilot Study

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Is Trafficking in Human Beings Demand Driven? A Multi-Country Pilot Study

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EXECUTIVE SUMMARY

The ASEM Action Plan to Combat Trafficking in Persons, Especially Women and Children (2001), stressed the need to encourage research on the demand for the most common forms of exploitation of trafficked women and children, in particular for commercial sex services, and recommended a multi-country study into the demand side of trafficking as one of its follow-up actions.

In response to this recommendation, the Swedish Ministry of Foreign Affairs, Sida and Save the Children Sweden, commissioned the authors to coordinate a pilot research study on the demand underlying two sectors where the labour/services of trafficked persons are known to be subject to exploitation: prostitution and domestic work. This report sets out some of the findings of the pilot study and ongoing research concerning employer demand for domestic workers in private households, and consumer demand for commercial sexual services in selected European and Asian countries.

The research discussed in this report suggests that three related factors are key to explaining the exploitative conditions experienced by many migrant domestic and sex workers: (a) The unregulated nature of the labour market segments in which they work; (b) the abundant supply of exploitable labour and (c) the power and malleability of social norms regulating the behaviour of employers and clients. The continued expansion of any unregulated market is likely to require and facilitate the exploitation of vulnerable labour. Both paid sex and domestic work are peculiar market segments in the sense that there is both political and social unease regarding those who buy and sell in them as workers or consumers/employers. In both sex and domestic work, the absence of effective regulation is one of the factors that help to create an environment in which it is possible and profitable to use unfree labour.

INTRODUCTION

The recent ASEM Action Plan to Combat Trafficking in Persons, Especially Women and Children (2001), stressed the need to encourage research on “the demand for the most common forms of exploitation of trafficked women and children, in particular for commercial sex services”, and recommended a multi-country study on the “demand side” of trafficking as one of its follow-up actions. In response to this recommendation, the Swedish Ministry of Foreign Affairs, Sida and Save the Children Sweden commissioned the authors to coordinate a pilot research study on the demand in two sectors where the labour/services of trafficked persons are known to be subject to exploitation: prostitution and domestic work. The study, conducted from September 2001 to June 2002, initially set out to explore employer demand for domestic workers in private households, and consumer demand for commercial sexual services in four countries: Sweden, Italy, Thailand and India. Once under way, we were asked to extend our research on the demand for commercial sex to include Japan and, because of difficulties in recruiting Swedish men for interviews, we interviewed Danish men instead. European and North American expatriate employers of domestic workers in Thailand and Hong Kong were subsequently interviewed by the authors. With the support of the Economic and Social Research Council of Great Britain, the authors are currently building on this pilot study by gathering data on the demand for migrant sex and domestic workers in the United Kingdom and Spain. This report sets out some of the findings of the pilot study and our ongoing research.

1. THE DEMAND SIDE OF TRAFFICKING – CONCEPTUAL AND POLITICAL PROBLEMS

To conduct research on any given topic, it is necessary to define the phenomenon under investigation. Exploring the demand for the labour/services of “trafficked” persons presented two sets of very serious problems. First, who is to be counted as a “trafficked” person and, second, what is meant by “demand”? The problems and political divisions surrounding the term “trafficking” are not fully resolved by the definition adopted in the United Nations’ Palermo Protocol on trafficking in persons (2000),¹ since it fails to define many of the constituent elements of “trafficking”. For example, the terms “sexual exploitation” and “exploitation of the prostitution of others” are not defined. This makes it virtually impossible to specify who has or has not been “trafficked” into the commercial sex trade without becoming embroiled in the more general debate about the rights and wrongs of prostitution – a debate which is both highly polarized and hugely emotive. The protocol’s failure to explicitly define difficult terms such as “exploitation”, “coercion”, “vulnerability” and so on, is equally problematic in relation to other sectors (Anderson and O’Connell Davidson, 2002). The question of who counts as a “trafficked” person is also clouded by the fuzzy and unworkable distinctions between trafficking, smuggling and migration.

1.1 Trafficking, smuggling and migration

There are strong political pressures to divorce the debate on “trafficking” from the more general phenomenon of migration, and to treat “smuggling” and “trafficking” as distinct phenomena. However, if the primary concern is to locate, explain and combat the use of forced labour, slavery, servitude and the like, then there is no moral or analytical reason to distinguish between forced labour involving “illegal immigrants”, “smuggled persons” or “victims of trafficking”. The distinction between trafficking and smuggling may be clear to those who attach political priority to issues of border control and national sovereignty, but it is far from obvious to those who are primarily concerned with the promotion and protection of the rights of migrant workers. Indeed, it is widely believed that the trafficking/smuggling distinction represents a gaping hole in any safety net for those whose human rights are violated in the process of migration (Gallagher 2002: 27). As many analysts have observed, policies designed to control and restrict immigration can actually fuel markets for “trafficking” and “smuggling” and contribute to the construct of irregular migrants (“trafficked”, “smuggled” or otherwise) as cheap and unprotected labour (Gallagher, 2002; Morrison, 2000; ILO, 2002). This should alert us to the

existence of demand not just for cheap labour/services in destination countries, but also for opportunities to migrate in sending countries.

“Trafficking” is often described as a form of modern-day slave trade and, for most people, it evokes images of women and children being snatched from their homelands and forcibly transported elsewhere. Yet, research generally points to the conclusion that in the vast majority of cases, “trafficking” is a corrupted mode of migration, that transforms very specific migratory projects, such as the desire to accumulate savings or support one’s dependants by migrating to work, the dream of securing a better future for one’s children by sending them to be raised and educated abroad, the desire to transform one’s life by marrying “well”, and so on, into nightmares (Andrijasevic, 2003; Agustín, 2002). It is therefore important to recognize that the individuals concerned had good reasons for migrating, which is why the adverse publicity, and even personal experience regarding the dangers associated with undocumented migration are rarely enough to stop people from taking the risk (see, e.g. Phongpaichit, 1999). Furthermore, the idea that “trafficking” constitutes a subset of illegal migration relies on an over-simplistic distinction between “legal” and “illegal” migration. In practice, even legal migration processes often have illegal elements, while “trafficked” persons frequently enter a state legally. For instance, women may legally enter as wives and then be subjected to forced labour. Meanwhile, deception and exploitation are also features of legal labour migration schemes, both during the process of migration and at the point of destination. Indeed, migrant workers’ rights organizations have recently reported a “rise in the incidence of unpaid wages, confiscated passports, confinement, lack of job training and even violence” against migrant workers who are legally present in a number of countries under various work permit schemes (AMC, 2000). Very often workers are vulnerable to such abuses precisely because they have migrated legally under work permit schemes that tie them to a certain employer.

There are also more general problems in terms of distinguishing trafficking from legally tolerated employment contracts. Questions about what constitutes exploitative employment practices are much disputed – indeed they have historically been, and still are, a central focus of the organized labour movement’s struggle to protect workers. There are variations between countries and different economic sectors within a country concerning what are socially and legally acceptable employment practices. In the absence of a global political consensus on minimum employment rights and cross-national and cross-sector norms regulating employment relations, it is extremely difficult to come up with a neutral, universal yardstick against which “exploitation” can be measured. The same applies to legally tolerated forms of exploitation of women and children within families.

Violence, confinement, coercion, deception and exploitation can and do occur within both regular and irregular systems of migration and employment. The fact that such abuses can vary in severity and thereby generate a continuum of experiences rather than a simple either/or dichotomy, further complicates a meaningful definition of trafficking. At one extreme of the continuum we can find people who have been transported at gunpoint, then subjected to forced labour through the use of physical and sexual violence and death threats against them or their families back home. At the other end are those who were neither charged exorbitant rates by recruiting agencies nor deceived regarding the work for which they were originally recruited, and whose rights are respected. But, between the two poles lies a wide range of experience. The precise point along this continuum at which tolerable forms of labour migration end and trafficking begins will vary according to our political and moral values.

1.2 Demand for trafficked labour

Even if it were possible to agree on a precise and workable definition of “trafficking”, the notion of *demand* for a trafficked person’s labour/services would present another set of problems. To begin with, there is no reason to assume that “trafficking” actually meets a specific demand *for a trafficked person’s labour/services*. It is hard to imagine an abusive plantation manager or sweatshop owner turning down the opportunity to subject a worker to forced labour or slavery-like practices because s/he is a “smuggled person” rather than a “victim of trafficking”, and harder still to imagine a client refusing to buy the sexual services of a prostitute for similar reasons. It makes more sense to assume that the niceties of international and national law on trafficking, and the nature of a person’s journey into vulnerability and bondage, are irrelevant to those who exploit or consume their labour/services. In other words, questions about the demand for a “trafficked” person’s labour/services are analytically and temporally inseparable from more general questions about the demand for the labour/services of all those who are unable to freely retract from an exploitative situation because they are tied to their exploiter through some form of non-economic compulsion.²

Another difficulty arises from the fact that a “trafficked” person’s labour/services can be exploited in many and very different sectors and settings, such as private households, mines and factories, agriculture, construction, street begging and drug running, and the sex industry, to name but a few of the most obvious. The individual who controls and directs the “trafficked” person’s labour/services also appropriates the end product of such labour either for his own enjoyment, for instance, the real or

fictive kin of a “trafficked” child, the husband of a “trafficked” bride, or to sell it to others to enjoy, e.g. in the garment or the sex industry. The coercion into begging or petty crime does not generate a good or service to be consumed, but generates an income for the individual exploiting the trafficked person’s labour. The notion of “demand” for the labour/services of a “trafficked” person can thus embrace a broad and diverse range of motivations and interests. It can refer to an employer’s need for cheap and docile labour, or to consumer demand for cheap goods and/or services, or for household labour or subsistence labour, or to any or all of these.

We were commissioned to conduct a pilot research study on the demand from individuals who consume labour/services in two particular sectors – domestic work and prostitution. However, in each of these sectors it is possible to talk in general terms about the demand from both third parties who recruit, organize and profit from the labour of domestic or sex workers, and those who consume their services and when discussing “demand” for a “trafficked” person’s labour/services in the sex industry, the question of whether to examine the employers’ interest in cheap and vulnerable labour, or the consumer demand for sexual services, is a politically charged one. From one political perspective – which can loosely be termed “abolitionist” – prostitution represents a form of male sexual violence against women. A market in commercial sexual services is said to necessarily reduce women and girls to mere commodities, and precludes any distinction between “forced” and “voluntary” prostitution. Viewed from that angle, to employ a woman as a prostitute is by definition to exploit her, and to pay for commercial sexual services is automatically an act of “sexual exploitation”. Lobby groups adopting this political perspective therefore insist that trafficking is driven by consumer demand for commercial sexual services, as well as employers’ demand for cheap labour in the sex industry. Groups such as the Coalition Against Trafficking in Women therefore call for legal penalties against sex buyers, arguing that “the least discussed part of the prostitution and trafficking chain are the men who buy women for sexual exploitation through prostitution, pornography, sex tourism and mail order bride marketing” (Raymond, 2001: 9). The same arguments are rarely applied to any other sector – consumers who buy the product of the labour of “trafficked” women, children and men in the form of T-shirts, diamonds, processed meat, etc. are not normally identified as part of the “trafficking chain” – and, needless to say, the abolitionist position is unacceptable to those who, in principle, have no moral objection to the sale or purchase of sexual services. For those who adopt a liberal or libertarian stance on sex commerce and view it as little different in moral and political terms from any other market in personal services, the idea that the entire commercial sex market should be eradicated in order to tackle the problem of trafficking for prostitution, is as draconian and wrong-headed as the idea that it is necessary to eliminate demand for carpets in order to address the problem of

forced and child labour in the carpet industry. From this perspective, questions about the demand side of “trafficking” for prostitution are clearly about employer demand for forced labour rather than consumer demand.

We do not fully accept *either* of these polarized positions on prostitution and approach the questions about possible links between consumer demand for commercial sexual services and the use of unfree labour within the sex industry from a rather different starting point (and from this vantage point, there are many parallels between the markets for domestic and sex workers). Our approach can be briefly summarized as follows:

First, one of the most visible developments in the sex industry over the past two decades has been its rapid expansion and massive diversification (Bernstein, 2001). In most parts of the world, the opportunities to buy sexual services have become both more and more varied. Commercial sexual experiences can be obtained both legally and illegally, and the boundaries between commercial sex and other consumer items (leisure, tourism, entertainment, etc.) have become increasingly blurred. Does the expansion of this market fuel “trafficking”? There is no automatic relationship between consumer demand and any particular or specific form of employment relation in the sex industry. In theory, demand for any given commercial sexual service can just as well be met by someone working independently in good conditions as by someone subject to abusive and slavery-like practices. And yet there are some fairly obvious reasons to expect that the rapid expansion of a market that is poorly regulated, widely stigmatized and partially criminalized will be associated with an increase in the incidence of abusive labour practices. In this sense, growing consumer demand is undoubtedly one of the factors contributing to the phenomenon of forced labour in the sex industry. Though it does not follow that *all* demand is now met by unfree labour (indeed, it is almost certainly the case that the bulk of demand is met by formally “free” workers), we would argue that this does provide legitimate cause for concern about the expanding demand for commercial sex. Similar points can be raised regarding the market for domestic services. Again, we are witnessing growing demand for labour in a largely unregulated sector that relies on a predominantly female workforce, many of whom are migrants or members of ethnic minority groups, and that has historically been constructed as low-status, “poor work”. Again, there are good reasons to suspect that some of this demand will be met by unfree workers.

Second, those who consume the labour/services of both prostitutes and domestic workers often have an interest in the *person* of the worker, rather than simply the product of her/his labour. Where the consumer who buys an item of clothing, or a

piece of fruit or a packet of cigarettes has no interest in the identity of the workers whose labour produced them, the worker's age, gender, race, nationality, caste, and/or ethnicity, as well as her/his appearance, demeanour and linguistic capacities can matter a great deal to those who buy sex or employ a domestic worker. It is therefore conceivable that consumer demand in these sectors (i.e. demand for workers with a specific and particular profile in terms of age, gender, race, etc.) is more closely related to the phenomenon of "trafficking"/forced labour than in other sectors, such as the carpet or garment industries.

The above considerations lead to the conclusion that by going into and exploring the social construction of the general demand for sexual and domestic services may help to contribute to the analysis of "trafficking" and other forms of unfree labour. Within this, however, we believe that it is vital to recognize and investigate the diversity of domestic work and sex commerce. Not all domestic and sex workers are "trafficked", and not everyone who employs a domestic worker or buys sex is directly implicated in "the trafficking chain". This points to a number of important questions about those who in fact consume the services of sex and domestic workers – for example, are all who employ domestic workers or buy sexual services potentially exploiters of "trafficked"/unfree labour, or are there subsets of employers/clients who are especially prone to using "trafficked"/unfree workers? What encourages and what militates against the use of unfree workers?

Though the research reported below is small in scale and limited in many respects, we hope that it will nonetheless provide food for thought for those who are interested in these as well as more general questions about the social construct of consumer demand for labour/services in two sectors in which the use of unfree labour is known to represent a serious problem.

2. RESEARCH METHODS

2.1 Design of the pilot study

Since this pilot study had to be designed, executed and recorded over an eight-month period, its nature was necessarily limited and exploratory, and its findings should be taken at best as suggestive rather than conclusive. The study involved both qualitative and quantitative methods. Semi-structured interviews with employers of domestic workers were conducted in Sweden, Thailand, India and Italy (and subsequently with expatriate employers in Hong Kong and Thailand), and with clients of sex workers in Denmark, Thailand, India and Italy. Because studies on sensitive topics (and on commercial sex, in particular) have often been criticized for failing to use matched control samples, the study also included interviews with non-employers and non-clients.

Recruiting a sample for research on the demand for either commercial sex or domestic work invariably presents great methodological challenges. There is no sampling frame listing everyone who uses prostitutes or employs domestic workers and it is, therefore, impossible to obtain a random or probability sample of these particular population groups. Accessing clients or employers who break the law or engage in practices regarded as socially undesirable (for instance, buying sexual services where it is illegal to do so, or who contravene legislation regulating the employment of domestic or sex workers) is even more difficult. It takes time to find people willing to be interviewed about personal and sensitive topics and since we had very little time, we recognized from the outset that it would be unrealistic to aim for more than ten employer and ten client interviews in each country. This meant that the interview research was not, nor could have been, undertaken with a representative cross section of either.

Because we were keen to generate comparable, cross-national data, the research design included two small surveys, one exploring demand for commercial sex and one the demand for domestic work to be undertaken in each country. The survey on commercial sex also covered Japan. Ultimately, it proved impossible to standardize the sampling techniques used in each country in the time available. Though the “sex survey” and the “domestic work survey” produced some very interesting data, unfortunately they were not fully comparable.

2.2 Limitations of the pilot research

Because of our extremely tight deadline we were necessarily guided more by what was possible and practical in the time available than by what was methodologically ideal. We therefore wish to highlight key limitations of the research that should be borne in mind when reading the findings presented below:

- Although the pilot study spans several countries, research took place in particular cities in each of the countries concerned. Demand for both sex and domestic work can take very localized forms and there may be significant regional variation within any one country. The findings from each of our country studies cannot necessarily be generalized as representative of the country as a whole.
- The markets for both domestic work and commercial sex are extremely diverse. This means that there is no one single “type” of employer or client. Therefore, the findings from interview research with a small and non-random sample of employers and clients in each given location cannot be taken as providing a “snapshot” of *all* forms of demand in that location.
- Although we aimed to standardize research on clients and employers in the countries involved to make data sets from each country comparable, this proved to be impossible in the timeframe and budget available. Instead of a comparative cross-national study, we have a series of small pilot studies in different countries, elements of which are comparable. This means that the data need to be treated with great caution.

2.3 Ongoing research

Our on-going ESRC-funded research builds on the pilot study by gathering matching interview and survey data on employers and clients in the UK and Spain. It also involves ethnographic research on tourist-related demand for migrant domestic and sex workers in Tenerife. At the time of writing, interviews with ten UK employers of domestic workers had been completed (Bott, 2003), and we are midway through fieldwork in Tenerife.

2.4 A note on terminology

The polarity of international debates on prostitution presents those who write on the topic with dilemmas regarding terminology. Both “prostitute” and “sex worker”

have become ideologically loaded terms, each being taken to imply a particular political perspective on prostitution. Since we do not fully endorse either perspective, this report uses both terms. The term “prostitute” does not imply any disrespect for persons working in this area, and the term “sex worker” is not intended to imply that the authors rejoice in the existence of a market for commercial sex, or recommend prostitution as a fulfilling and life-enhancing career choice.

3. THE SEX SECTOR

The number of people interviewed and surveyed in the pilot research on the “demand side” of the commercial sex sector are shown in Table 1:

TABLE 1
SIZE OF SAMPLES USED IN PILOT RESEARCH IN EACH COUNTRY

	Client interviews	Control interviews	Survey
India	10	5	62
Thailand	8	2	90
Italy	9	5	56
Sweden	None	2	84
Denmark	10	3	None
Japan	None	None	98
Total	37	17	390

Occupational groups targeted by the different country teams for inclusion in the survey (Table 2):

TABLE 2
OCCUPATIONAL BACKGROUND OF RESPONDENTS IN EACH COUNTRY

	Police	Soldiers	Students	Salarymen	Athletes	Other	Total
India	16	0	13	0	0	33*	62
Thailand	87	3	0	0	0	0	90
Italy	20	7	5	0	0	24**	56
Sweden	0	19	40	0	23	0	82
Japan	0	0	2	96	0	0	98

* Of whom 16 were professionals and 12 were manual workers.

** Of whom 12 were professionals and 6 were manual workers.

Since country teams used different techniques to recruit a sample of those groups, and the Indian and Italian teams made specific efforts to find clients within the occupational groups targeted, it is not possible to compare clients and non-clients in the Indian and Italian surveys. It also means that though we have survey data from

almost 400 respondents from five countries, 185 of whom with experience of buying sex, they are not fully comparable. We should note that although the research was not intended to gauge the level of demand for prostitution in any of the countries involved, the survey data from Sweden, Japan and Thailand reflect substantial differences between these countries in that regard. While only eight out of 84 Swedish respondents acknowledged to ever having paid for sex; 36 in Japan (around 37%) and 65 in Thailand (73%) had done so at some point in their lives. This may in part be accounted for by differences in the composition of the sample from each country. It should also be noted that among the small sample of Swedish soldiers on peace-keeping operations in Kosovo, the percentage was higher with three out of 19 answering in the affirmative.

3.1 Masculinity, social conformity and the use of commercial sex

What is it that “makes” a client? The survey data showed that a client’s first experience with a prostitute was more likely to have been arranged by friends or colleagues than the result of an independent decision (see Table 3 below). In other words, for the majority of our clients, the initial decision to buy sex appears to have been as much a public and social matter as a private and personal affair.

TABLE 3
CIRCUMSTANCES OF FIRST EXPERIENCE OF BUYING SEX (%)

	Arranged through friends or colleagues	Arranged through family member	Prostitute approached client	Independent decision
India (n=49)	69	0	6	25
Italy (n=26)	69	0	8	23
Thailand (n=63)	76	3	2	19
Sweden (n=8)	38	0	25	38
Japan (n=33)	46	3	12	39
Total	65	2	7	26

In Thailand in particular, both the survey and interview data suggest that buying sex can be part of a “rite of passage”, as well as a ritual to consolidate relationships with male friends. Thai interviewees mentioned boys visiting sex workers to mark

the end of their schooling and to establish their status as adults, and noted that it was common for a senior to take new university students to sex workers so that they may demonstrate themselves as “real men”. One interviewee intended to take his own son to a brothel when he was 16 or 17. More generally, the interview data from both India and Thailand suggest that boys and young men’s initial experiences of prostitution are prompted by some combination of their own perception of the social demands of masculinity, and peer pressure to conform to those demands. It shows that buying the services of a prostitute could be a way of publicly demonstrating membership of a particular male subgroup, and/or to claim a particular social identity (as “adult”, “man” or “not gay”).

However, there are two important caveats. First, it is highly probable that there are significant cross-national differences regarding the extent and nature of social pressure on men to buy sex. Danish interviewees, in particular, were unanimous in asserting that they had never experienced social pressure to buy sex and in rejecting the idea that visiting a prostitute could be viewed as a public mark of virility or masculinity. Though they believed that it was important to conform to social standards of heterosexual manliness, they felt that using prostitutes was not a way in which to publicly demonstrate “real manhood”. Scandinavian control interviewees shared these views. Existing research indicates that a far smaller percentage of Swedish and Danish compared to Thai men had ever paid for sex, and our interview research suggests that this finding may partly be accounted for by differences in the social meanings attached to buying sex. In Scandinavia, social pressures to be a real man seem to vie with strong social pressures *not* to buy sex, making prostitute-use into an essentially private rather than public matter. In contrast, for our Thai respondents there was no tension between being “a man” and going to prostitutes, indeed it was depicted as normal masculine behaviour at certain stages of the life-cycle and among certain groups.

Second, the research data show that a man’s status as “client” can often be temporary and context-specific, suggesting that for some men at least, it relates to passing ideals of masculinity rather than to some life-long core masculine identity. Social pressures to engage in prostitute-use appear to be stronger among some occupational groups than others and, more importantly, they seem to be strongly focused on young men and boys, rather than men of all ages. Though our client sample cannot be taken as representative of clients in general, or of all clients in a particular country, they are nonetheless a group of individuals who have experience of buying sex. Viewed as such, one interesting finding concerns the age at which they first bought sex. The data from all countries reveal that around 78 per cent had first gone to a prostitute when aged 21 or below, and about 18 per cent were aged under 18 (in Italy this concerned over half of those who had bought sex).

Having once experimented with prostitute-use, the vast majority of our respondents continued to buy sex (only for 18% was the paying for sexual services a one-off experience). It is interesting to note that in our sample of clients, the older a person was when buying sex for the first time, the less likely he was to have continued to do so. If this finding were to be replicated with a larger and more representative sample of clients, it would certainly suggest that those aiming at reducing the demand for commercial sex would be well advised to concentrate their efforts on educational and preventive work with teenage boys.

3.2 The demand for youthful prostitutes

Although a large number of the clients surveyed had first bought sex when they were aged 21 or less, two-thirds were now aged between 31 and 50 (only 7% were currently aged between 18 and 21). Despite their own advance towards middle age and beyond, youth was still a quality that most clients in all countries looked for in sex workers. Asked whether they preferred prostitutes of any particular age, over three-quarters of all clients surveyed expressed a preference for prostitutes aged 25 or under, 22 per cent preferred those aged 18 or below. Only 6 per cent expressed a specific interest in women aged over 30 (see Table 4).

TABLE 4
PREFERENCE FOR PROSTITUTES OF A PARTICULAR AGE

Age	India % (n=49)	Italy % (n=20)	Thailand % (n=63)	Sweden % (n=7)	Japan % (n=36)	Total % (n=175)
<12	0	0	2	0	0	1
13-15	8	0	0	0	3	3
16-18	37	10	13	0	14	19
19-25	47	45	48	57	78	54
30s or 40s	2	25	3	14	0	5
>50	0	5	2	0	0	1
Age irrelevant	6	15	33	29	6	18

Although the survey and interview data reveal that most clients attached sexual value to youthful bodies, generally clients did not wish to buy sex from prostitutes they thought to be too young to consent to the sexual encounter. This did not mean

that they would not buy sex from those who were children according to the UN definition of childhood. Indeed, several interviewees (and 22% of clients surveyed) expressed a preference for prostitutes aged 18 or below. However, our data also indicate that even clients with an express preference for teenage prostitutes base that demand on a set of ideas about age, gender and sexuality that allow them to imagine teenage girls as “women” who: (a) will not be harmed by the sexual experience, and (b) are capable of consent. For example, five of our Thai interviewees (including two police officers) held that it was acceptable for girls to prostitute themselves only when their bodies were sexually mature, around the age of 15, as below that age they would be harmed by working in prostitution.

Finally, there may be some relationship between a client’s perception of prostitution and the propensity to favour younger sex workers. Both our interview and survey research found that clients who agreed that “prostitutes are skilled and professional love-makers who should be given more respect” were less likely to express a preference for under-age prostitutes than were those who agreed that “prostitutes are dirty, but men need them for sexual relief” or that “prostitution is quick, easy and satisfying, like buying fast food when you are really hungry”.

3.3 Demand for migrant sex workers

The survey contained a number of questions relating to clients’ perceptions of and experience with migrant sex workers. Just under half of our sample of men who had bought sex reported ever having bought sex from a foreign prostitute (either at home or abroad). Some allowance should be made for under-reporting here, since Italian and Japanese clients may not have recognized the open-ended forms of prostitution often found in sex tourist destinations as “prostitution” (Gunther, 1998). Because of the sampling techniques used in this survey, our sample of clients does not reflect a representative cross-section of prostitute-users in each country, and the data cannot be used to support any comparative claims about levels of demand for migrant sex workers in any of them. What the findings do highlight, however, is the simple fact that clients are not a homogeneous group regarding the choice between migrant and local sex workers, and that not all men who buy commercial sex can be presumed to constitute “demand” for migrants’ sexual services.

The survey sought to explore whether racial or national stereotyping, sexual racism and price considerations shaped clients’ choices of sex workers, and asked clients whether they agreed with a series of statements comparing foreign and local prostitutes. A substantial number of clients surveyed believed that it was easier to

control the amount of “value” for a given sum of money from migrant prostitutes, and described migrant prostitutes as cheaper and more malleable than local women. In the particular samples of clients we were able to survey, such clients were in the minority (albeit a sizeable minority – more than one-third). However, such views did not appear to be necessarily based on direct personal experience, since many of those who commented on the differences between local and foreign sex workers also stated that they had only ever bought sex from local prostitutes.

Furthermore, other survey questions and the interview data suggest that clients’ attitudes towards some generic category of “foreigner” were probably not a very good indicator of their interest (or lack of interest) in migrant sex workers. Indeed, clients often held very different stereotypes regarding different groups of migrants. Rather than imagining “migrant sex workers” as a unitary group, they typically placed different groups on different rungs of a racial or ethnic hierarchy. In Delhi, most clients imagined dark-skinned women and girls from the Nat Bedia community at the bottom of this hierarchy, followed by dark-skinned local sex workers, then by lighter-skinned Nepali sex workers. White European sex workers were normally placed at the top. Furthermore, some men perceived a link between the client’s social status and the racial or ethnic identity of the sex worker whose services he purchased. This connection between the client’s position on a status hierarchy and the prostitute’s position on a racial/national hierarchy was articulated very explicitly by one Thai interviewee:

I prefer Thai sex workers because I feel more comfortable with them, and I don’t feel proud of myself if I go with migrant sex workers. Socially it is looked down on to be with Burmese sex workers because they work in particular types of establishments which are lower, and friends look down on it. In this male society, the place you visit makes you look good or not. In places where migrants work, the conditions are poor. If you can go to a massage parlour, it makes you look good. Having a university student is good too. Thai women work in different establishments, such as karaoke, and are more expensive. Poorer men have to go to migrant workers because they are cheaper (Thai government officer, Public relations, single, aged 27).

In other words, because Burmese migrants generally work in cheaper brothels satisfying the demand from migrant men and poorer Thai clients, to buy sex from a Burmese sex worker marks the client as a person of low social status. Most Thai interviewees shared the view that Thai ethnic majority women and girls stood above

Burmese women and girls on a hierarchy within sex work. This was partly based on the social devaluation of darker skin, which is widely associated with dirt, lack of sophistication, and peasantry (in the survey, 42% of Thai clients selected “light skinned” as one of the three qualities they most favoured in a sex worker). This devaluation of darker skinned persons also relates to the fact that Burmese women and girls work in cheaper, more “down-market” settings and are perceived as more likely to have been forced into prostitution, which is in turn believed to have implications for sexual health. Another reason why interviewees preferred Thai sex workers was simply that it was easier for Thai clients to communicate with them: “It’s hard to have sex without talking, because if you can’t talk, you lose the feeling”, as one interviewee put it.

When questioned about the relative “merits” of local and migrant sex workers, Danish interviewees also stated their preference for someone who spoke the same language. They too placed local workers at the top of the prostitution hierarchy, arguing that Danish sex workers (or at least non-drug using Danish sex workers) offered better service than migrant women. Indeed, both Thai and Danish clients discussed the differences between local and migrant prostitutes in relation to ideas about which group was best equipped to meet their specific demands (e.g. prostitutes who were “clean”, and/or who spoke their language, and/or were presented as caring, warm professionals). Sex workers were also ranked according to the social context, e.g. migrant prostitutes perceived as having been forced into prostitution (either by a third party or by their “miserable social background”) were deemed less attractive than local women whom they imagined as having entered sex work voluntarily and as enjoying better working conditions. Similar findings are emerging from our ongoing research in Spain and the UK. In holiday resorts in Tenerife, for example, British tourists and expatriates who buy sex often view migrant British sex workers as more desirable than Latin American ones because they value linguistic “sameness”. For the same reasons, Spanish tourists and local clients tend to favour Latin American sex workers. Meanwhile, African migrant women working in prostitution in Tenerife are typically devalued by both Spanish and British clients and stereotyped as “dirty”, “thieving” and controlled by “pimps”.

It must be reiterated that the clients interviewed in each country do not constitute a representative sample of the whole population of prostitute users in that country. Nonetheless, it is interesting that in all the countries where research was conducted, there were clients who identified particular groups of migrant sex workers as constituting the cheap end of the prostitution market. As such, these groups were perceived as embodying all that is least desirable in a prostitute (whether this meant cold, hard-bitten and mercenary, or dirty and uneducated, or pathetic, abused and victimized

depended on the individual client and on his society’s racist stereotypes about the group concerned). The data thus show that certain groups of migrant sex workers are viewed by some clients as a “poor man’s substitute” for more desirable and “classier” local sex workers. None of the clients we interviewed wanted to be seen as the kind of person who patronized “bottom of the range” sex workers and, though often this clearly had not prevented them from buying sexual services from “down market” migrants, the interview data suggest that they had done so as a matter of expedience rather than on the basis of a focused interest in racially/ethnically/nationally different sex workers.

3.4 Attitudes towards trafficked and otherwise “unfree” prostitutes

All survey respondents were asked whether or not they had read or heard about the phenomenon of trafficking of women and children into prostitution. As shown in Table 5, the vast majority had, although there were some notable differences between samples in each country on this question.

TABLE 5
PERCENTAGE OF RESPONDENTS WHO WERE AWARE OF
WOMEN BEING TRAFFICKED INTO PROSTITUTION

	Yes (clients)	Yes (non-clients)	No (clients)	No (non-clients)
India	86	Not available	14	Not available
Italy	96	Not available	4	Not available
Thailand	89	88	11	12
Sweden	100	95	0	5
Japan	77	67	24	33

Differences between countries may partly reflect the differences in the samples in terms of socio-economic and educational backgrounds. Having said this, however, we should note that Japanese respondents were the most highly educated group, with over 80 per cent with four years or more of university education, and yet they were also the least likely to have read or heard reports about the trafficking of women and children into the sex industry. Likewise, it is important to remember that the Thai sample, with the exception of three soldiers, was entirely comprised of police officers.

We might therefore expect (or hope) to find this group to be better informed about the phenomenon of trafficking than other occupational or social groups in Thai society.

We followed this question by asking respondents what they thought *clients* should do if they came across a prostitute whom they believed to be a victim of trafficking. A quarter of the men with experience of buying sex stated that clients should offer to help such women to escape, and more than half said they should report cases of abuse to the police. Of course, a variety of studies have shown a big difference between what people *say* they would do in response to a hypothetical survey question, and what they *actually do* in a given situation. There is no reason to accept that half of our sample of clients would really report the matter to the police if they came across an unfree sex worker. However, responses to this question, especially in conjunction with interview data, do suggest significant differences between clients regarding their propensity to buy sex from women or girls they know or believe to have been forced into prostitution.

In particular, the interview research found that those clients who knowingly used trafficked/unfree prostitutes did not perceive of sex workers as consenting subjects within the prostitution contract. Instead, they seemed to think that in prostitution, women/girls actually became objects or commodities, and that clients could therefore acquire temporary powers of possession over them. This was well illustrated in an interview with a client who described prostitution as “a market where the woman is selling *herself*” [emphasis added], and remarked:

When there is violence... it is mostly the prostitute's fault. See, I am going to buy something. If I am satisfied with what I am buying, then why should I be violent? I will be violent when I am cheated, when I am offered a substandard service, when I am abused or ill treated... Sometimes [violence] is because the prostitute wants the client to use condoms. They force it on the client... He will naturally be disgruntled, and there will be altercations (Indian bank clerk, married, aged 54).

Another client stated:

If [the prostitute] takes money and does not perform what she is expected to, then the customer will get angry. See, I understand that the prostitute is there in the first place because she has no choice or is forced there. I feel bad about this, especially if she is forced or sold. But the fact is that she is in the flesh market. The rules of the market

apply to her as well as to one who has come out of her own choice... It may sound bad, but the fact is that she is a commodity offering a service and she should accept that. We should all (Indian civil servant, married, aged 39).

Some interviewees appeared to view the use of forced labour within the sex trade as yielding benefits for clients. A 21-year-old Indian businessman commented that Nepali girls who had been sold into brothels “are especially nice when they are new to the area. They don’t talk too much and are more helpful to the client. You can control them”. Two Indian clients who particularly valued a semblance of warmth, care and intimacy in their encounters with prostitutes, also saw unfree and/or trafficked workers as offering certain advantages over formally free and/or local prostitutes. This, they explained, was because such workers were so isolated and unhappy that they sometimes looked to clients for support and care. As one interviewee put it, “Actually, they have no one to turn to except their clients. So, many women who come from other countries get their human warmth from clients” (Indian brick kiln owner, married, aged 48). Such clients were not only more likely to tolerate or justify violence against prostitutes, but also more likely to express a preference for younger and/or more vulnerable prostitutes.

Other clients interviewed in each of the countries involved in the research were repulsed by the idea of buying sex from prostitutes who were desperate, vulnerable or coerced into prostitution. Their unwillingness to buy sex from unfree prostitutes was not always nor exclusively grounded in high moral principles. Indeed, when interviewees spoke of the immorality of forced prostitution, such comments were invariably followed by, or interwoven with, comments to the effect that they personally would find it a sexual turn-off to use a worker whom they could not imagine to have freely chosen prostitution, and/or that prostitutes working in the poorest conditions were less likely to be able to provide them with the kind of service they preferred. Moreover, to insist that they would not buy sex from unfree workers was for many clients a means to claim social status and confirmation that they themselves were not poor, uneducated, unsophisticated, immoral and/or migrant.

We should also note that some clients who reported feeling either morally outraged or sexually “turned off” (or both) by the idea of using an unfree sex worker had nonetheless bought sex from workers who may have been unfree or trafficked. This was either because the client was drunk, or could not afford to patronize more expensive sex workers, or because the sex worker concerned happened to be the most immediately available. In short, a reluctance to buy sex from prostitutes who work in

the most visibly exploitative conditions is not necessarily grounded in any high ethical principle and even when it is, these principles may be jettisoned if the client happens to be drunk or short of cash, and may seem irrelevant if the prostitute does not conform to the client's stereotype of a "victim". Having said this, however, it seems logical to conclude that clients who have principled moral objections to the use of force and/or slavery-like practices in prostitution, and/or who find buying sex more sexually pleasurable when they can convince themselves that the prostitute engages in sex work out of her own free will, are much less likely to pay for sex with unfree workers than are clients who imagine prostitutes as objects of trade and/or who deliberately seek out the most vulnerable sex workers in order to exercise greater control in the prostitute-client transaction.

4. DOMESTIC WORK

Sample size for the interview and survey research is given below:

TABLE 6
SIZE OF SAMPLES FOR INTERVIEW AND SURVEY RESEARCH
ON DOMESTIC WORK

	Employer interviews	Control interviews	Survey
India	8	3	66
Thailand	6	2	50
Italy	10	5	45
Sweden	10	4	31
Total	34	14	192

It was very difficult to find matching control samples of non-employers at most research sites. Apart from the Swedish sample, those listed as controls had either employed domestic workers in the past or were currently employing them on an occasional basis. Besides the interviews for the original pilot study, we conducted additional interviews with five expatriate employers in Bangkok and Hong Kong, respectively. Ten employers in a wealthy district of London were also interviewed.

The objective of our “domestic work survey” was to map employers’ attitudes to domestic labour in general, and their employment practices and attitudes towards trafficked and forced domestic workers. Since no sampling frame listing all current employers of domestic workers existed at any of our research sites, it was impossible to select a random sample of employers. Instead, research teams approached survey respondents in a variety of ways. The Italian and Indian teams used personal networks. The Swedish researcher distributed questionnaires through the Home Service project, an organization that places unemployed migrant women in domestic work as a bridge to the regular labour market. The Thai teams distributed surveys in Bangkok and Chiang Mai using acquaintances, workplaces, door-to-door visits and department stores. Partly as a result of the different sampling strategies used, there are significant differences between the samples from each country in terms of gender, age group, income and marital status (see Table 7). Because of the different sampling techniques employed, it is not possible to use the survey data for purposes of cross-national comparisons.

TABLE 7
BACKGROUND CHARACTERISTICS OF SURVEY SAMPLES BY COUNTRY (%)

Research site	Male	Aged >61	Low income	Married
India (n=64)	6	6	5	90
Italy (n=45)	11	7	0	80
Thailand (n=50)	14	6	10	67
Sweden (n=31)	24	31	28	41

4.1 The social profile of an employer

Though many people would agree that it is important and interesting to ask “what *makes* a client?”, questioning “what *makes* an employer of domestic help?” may seem rather pointless. Employing a domestic worker is often taken for granted and, unlike paying for sex, is not generally perceived as the outcome of individual, “moral” choice. Studies exploring the rise in demand for labour in private households tend to focus on changing demographics and family structures, feminization of the labour force and lack of public provision for care. This indicates some recognition of the fact that the state is implicated in the creation of circumstances that generate demand. Data from our survey research broadly support this focus on structural issues: 45 per cent of all respondents stated that employing domestic workers meant they could go out to work and for 47 per cent of those who had children under ten, having childcare available when needed was an important reason for employing domestic help. However, our data also suggest that it is necessary to broaden the focus of research on demand for domestic workers. In particular, it is important to consider the demand for cleaning services, since 43 per cent of our respondents employed domestic workers to keep the house clean and tidy. This raises interesting questions about the idea of a “need” to keep a house looking nice, and how this relates to the reproduction of the employer’s social status and so to patterns of consumption of domestic labour. It highlights another way in which demand for these services is socially constructed, and shows that the question “what makes an employer?” is more complicated than many would initially assume.

Interview data reveal that employers are conscious of these complexities. This was particularly noticeable in interviews conducted with expatriates living in Bangkok and Hong Kong. Women who were “stay at home mothers” were very conscious of the fact that, once “back home” they would be unlikely to employ full-time household help, let alone have somebody living in. Meanwhile, those who had lived in

several different countries were very conscious of how the numbers of employees “needed” varied from place to place:

I really think I should do it all myself to be honest... my sister (...) has three children in England and she didn't have help. So, I mean I could do without a helper because I don't work. I could, but I don't have to (British woman living in Hong Kong, former teacher, now staying at home).

In Indonesia you have the whole family living with you. You hire more people than you need and it's not just cost, it's not just that the labour is cheaper there, but that's they way you do it, to take care of people. So, we had a disproportionate number of staff, more than we should (Dutch man living in Bangkok, executive in a telecommunications company).

The living and working conditions considered appropriate for domestic workers also vary according to where the employer happens to be living at any one time:

A friend of mine just took her helper back [from Hong Kong to the UK] last March ...and she's really having to re-think the relationship to make it acceptable to her, and just generally more acceptable than it would be... This girl bought a big five bedroom house, and her helper has had the second master bedroom with an en-suite bathroom. Now she would never have given her that accommodation here, but she felt she needed to give her better accommodation in the UK. When visitors come and see what a helper's room looks like [here in Hong Kong]...they are generally horrified (British woman living in Hong Kong, part-time lawyer).

4.2 Reasons for employing migrants in private households

Employment in private households is almost always heavily segmented according to gender, age and race. Migrants occupy different positions in labour market hierarchies depending on their country or region of origin, their immigration status, their gender, skin colour and other local factors. In all the countries where we collected data, certain groups or nationalities were generally preferred as domestic workers by employers. In India for instance, tribal Christians were typically considered desirable employees because they are stereotyped as professional, hardworking

and disciplined. In Sweden, there was a preference for “girls from the Baltic States because they need social and economic aid”, while Muslim and gypsy employees were to be avoided – “The only group I would never consider are gypsies. Imagine someone with big skirts. Everyone knows they are unreliable.” Meanwhile, in Thailand, the Burmese were stereotyped as particularly desirable as domestic workers. Thai survey respondents characterized Burmese workers as being cheap (82%), hardworking (82%) and obedient (69%), and regarded these as main qualities to look for in a domestic worker.

Although migrants occupy very different positions in the labour market for domestic workers, their situation as migrants can make them desirable employees. When employers were asked what advantages they perceived in employing migrant (internal as well as international migrants in the case of India) domestic workers rather than locals, they cited flexibility in terms of numbers of hours and when those hours are worked, cooperativeness and labour retention as benefits of employing migrant labour. Italian and Swedish interviewees, in particular, contrasted the demands made by local workers against the pliability and flexibility of international migrants.

They are generally more flexible than Swedes. Swedes are so governed by rules. It is unthinkable for a Swede to work during nights or weekends. Migrants don't question the kind of work they are expected to perform. Swedes on the other hand always talk about rules formulated by their unions (Swedish female purser, married, aged 51).

Six of the ten Swedish employers interviewed described Swedes as being “spoiled” in the sense that they are able to turn down work because of the social security system, or that they had recourse to the labour movement. Similarly, seven of the ten Italian employers complained that Italians were more difficult and demanding to employ. Migrants were contrasted as being hardworking, grateful and enthusiastic. Since domestic labour falls within the informal sector, workers are theoretically free to leave at any time. This is problematic for many employers, since an employee who knows how the household “works” and, more particularly, who has established a relationship with a child or elderly person in the home, is not easily replaced. Interviews revealed bitter complaints about employees who simply “upped and left”. Migrant workers were valued because employers believed they were less likely to quit without notice, either because of immigration status or because they had nowhere else to go to. There is common recognition that migrants, whether internal or international, are more flexible, cooperative and likely to stay because they had little choice. It is not simply a question of migrants having inherent qualities of grati-

tude and enthusiasm. Interviewees at all research sites were clear that migrants were easier to control because they had fewer options. This is well illustrated by a Dutch expatriate with experience of employing domestic workers in Singapore and Thailand (and her remarks also highlight the fallaciousness of the notion that workers are necessarily protected within legal and regulated systems of labour migration):

Singapore, the system is wonderfully organized from an employer's perspective. The employer holds the Filipino maid's passport, and the maid has to pay to leave. The employer pays the government, it's all official, but the maid is totally dependent on the employer... they can't just quit.

The advantages of migrant labour for the employer are thus acknowledged as a consequence of the workers' vulnerability and lack of choice. One employer said that domestic work was like prostitution – work that nobody would do if they had other options. Migrant labour seems to be ideal for domestic work in that the worker is an isolated unit of labour, free to mould itself to the requirements of the individual household.

The racial, ethnic or national “otherness” of a migrant worker can also help employers to resolve a troubling aspect of the relationship between employer and live-in worker, namely that many employers find it uncomfortable and difficult to manage day-to-day aspects of sharing a home with a worker. Some interviewees quite explicitly stated that they employed migrants because it makes this relationship easier to manage, since the gap is “unbridgeable”. As a Hong Kong expatriate British employer of a Filipina explained:

It's difficult having someone working for you from the same race because we have this idea of social class in our minds, don't we? And that would be uncomfortable in your house. Whereas when it's somebody from a different country, you don't have all that baggage... There's none of that middle-class, working-class, upper-class thing... it's just a different race.

However, to effectively resolve the employer's anxieties about sharing a home, the “otherness” of the worker needs to be combined with the type of vulnerability described above. For example:

They're foreign and they're illegal and they're scared and timid, and so they're not going to take up space. They're going to be very, very small, and that is generally easier to live with than someone who feels that this is their home. They're in really bad situations...they're terrified (British female employer in London, see Bott, 2003).

Moreover, by employing a worker who is isolated, vulnerable, and without choices or opportunities, employers can easily dress up a relation of exploitation as one of paternalism/maternalism. Interviewees often used the language of obligation, support and responsibility, rather than power and exploitation, the language of natural relations rather than market considerations. As one (exceedingly wealthy) Thai employer put it “if we recognize them as our family members, they need to accept more and be more respectful and faithful”. Just as we found that clients tended to imagine prostitution as a symbiotic relationship between the prostitute who needed the money and the client who sought sexual relief, these interviewees constructed domestic work as involving a relationship of mutual dependence: the domestic worker is impoverished and needed money and work, the employer needed a “flexible” worker, and both fulfil the other’s need. By entering into such a relation, the employer demonstrates kindness and social status. Thus, migrants are perceived as suited to domestic work because of their dependence and gratitude, which in turn means that they do not bring the “market” with them. The employer does not have to feel that this is a purely economic transaction, or that they are being serviced without feelings.

The relationship between me and the local girls was very instrumental, of economic dependence, there was no human element to it, strictly professional. As soon as [one local girl] got married she went without much explanation. I was so angry, disappointed, that I decided to have a girl from Mauritius. Now she's like part of the family. We make sure she doesn't need anything and I never have the feeling that she's staying one hour extra only because I'm paying her that hour. These coloured girls are really in need. They have strange relationships with their families. They send money to them (Italian female teacher, married, aged 39).

4.3 Contract and duty

As the last example indicated, the introduction of market relations into the private home can be experienced as deeply disturbing by employers. The home is imagined as governed by mutual dependence and affective relations, its values are in opposition to those of the market, driven by self-interest and instrumentalism, where individualism rather than conforming to pre-existing social roles is the rule. One reason for and the consequence of this is an unwillingness to regard domestic work, paid or unpaid, as “proper work”. The research indicates two broad models of relations that structure domestic employment. The first is regulated by contract, the relation constructed as the commoditization of labour. It is the model of professionalizing both the ways in which tasks are performed and how the employment relation is viewed. The second is regulated by what could be termed “duty”. This model draws on notions of protection and responsibility, the master/mistress has a duty of care towards the servant/helper, the helper is not commoditizing his/her labour, but is subject to the employer and bound into their family through a set of hierarchical but, allegedly reciprocal, relations. This latter is a particularly convenient model for employers when the “helper” is very vulnerable – i.e. an undocumented worker.

Though the prevalence of each model will depend on its particular context, it is clear that individual employers frequently slip from one model to the other. For example, 61 per cent of survey respondents described their relations with domestic workers as “friendly and professional” compared to 19 per cent who described it as “professional” and 13 per cent as “friendly”. The survey data also reveal that domestic work is conceived as being somehow different from other work, and this is particularly clear when we look at respondent views on the rights (or their lack) to which workers in private households are entitled: 48 per cent of survey respondents did not think that domestic workers were entitled to a contract with their employer; 70 per cent thought workers should not have the right to join a trade union; 52 per cent were opposed to a right to minimum wages, and 45 per cent felt that a right to fixed working hours did not apply. Despite this sector’s history of organization in Italy and domestic workers’ relatively high entitlement to rights, there are some surprising gaps. For example, over 40 per cent of Italian employers participating in the survey felt that domestic workers had no right to paid holidays, fixed working hours, minimum wages, pension rights, their own room, trade union membership or a contract with their employer. Similarly in Sweden, even among those whose relation with their worker was termed “professional”, more than 60 per cent did not feel that domestic workers were entitled to the minimum wage, and 40 per cent did not consider a regular day off as a right. Labour rights that would be considered “normal” in the formal economy are clearly not considered necessary for domestic workers,

despite the rhetoric of “professional” relations. During the interviews employers often maintained that they were employing domestic helpers in the informal/illegal economy, and that this somehow made normal labour rights irrelevant.

Because it is a matter of illegal employment in our case, the mentioned rights are not valid. Generally I feel, of course, that employees in households should be entitled to the same rights as employees in general (Swedish male, company chief executive, married, aged 51).

Thus, although workers were *in principle* entitled to such rights, they somehow forgo them by working in the informal economy, even though their employers may feel that they should be entitled to them. Some of this conundrum may be explained by noting that the Swedish and Italian interviewees referred to the social security safety net as giving “illegal” workers basic protection – though this would usually not refer to migrants or to *au pairs*. More generally, employers felt that labour rights were not appropriate because workers did not need protection from them as individual employers and because such rights were inapplicable or inappropriate in the particular context of the private household.

4.4 Age and domestic work

Some employers openly compared migrants with children. As one British woman in our sample of London employers put it, “I take the view that they are children. They’re hopelessly vain and quite thoughtless.” Certainly, both migrants and children are considered particularly suitable for domestic work, and this seems to be because neither group is deemed as properly part of the regular workforce and, as noted above, domestic work is not perceived as regular work. The survey shows that employers believed it to be more suitable for those aged under 18 to work in domestic service than in other sectors. This is particularly so in India, where domestic labour is a significant employment sector for children. Indeed, we were told by our Indian research colleagues that having a child domestic worker, particularly as a “playmate” for the employer’s child, is considered perfectly acceptable.

In Delhi, of the 48 employers surveyed, nine employed workers under 18 (the youngest two were aged 8 and three others were under 16). Younger workers were more likely to live in and to be paid less. The current going rate in Delhi for live-in workers is Rs.1,000-2,000 per month. Fifteen per cent of those aged over 18, and

nearly 40 per cent of those aged 18 and under, earned Rs.1,000 or less a month. Though only nine of the employers surveyed in Delhi currently employed workers aged under 18, 45 per cent of the 124 domestic workers listed as employees were under 25, and several interviewees either were or had been employing children and young people, and generally found it to be an advantage because “you can mould them to the way you want things done”. When asked the minimum age acceptable for domestic workers, nearly all interviewees responded that it *should be* over 18, even though this opinion was contradicted by their own history as employers. Furthermore, opinions as to the proper age for a person to enter domestic work are not necessarily a good indicator of whether or not an employer is prepared to use child labour, since child workers are not always constructed as “workers”. Instead, they are imagined as “part of the family” both by employers and by third parties: “We do not call them servants, we call them *helping hands*” as one placement agency in Delhi put it. This helps to conceal the labour relation between child worker and employer.

The ambiguity surrounding child labour and the unwillingness to recognize children as workers is not peculiar to India. A preliminary analysis of UK survey data indicates that British employers would also employ child domestic workers in certain circumstances, either to do “light housework” or if they lived in a developing country. People set the age at which they considered it suitable to start employment in private households lower for developing countries than for the UK. Interviews with Bangkok expatriates also revealed that they either had employed or would consider employing children under 16.

4.5 Attitudes towards trafficked and otherwise unfree domestic workers

To our question whether they were aware of people being trafficked into domestic work, the answers differed significantly depending on the research sites: among Thai respondents, 84 per cent (though only three of the six expatriates surveyed) responded positively, and 81 per cent of Indian, 62 per cent of Italian and 44 per cent of Swedish respondents stated that they were aware of this phenomenon. For Italy and Sweden this is dramatically below the percentage of respondents in the “sex survey” who had heard of women being trafficked into prostitution. In Thailand and Sweden this seemed to have an impact on their potential response to forced labour. Those who had heard of forced labour in domestic work were more likely to state that they would report instances of unfree labour to the police, and those who had not

TABLE 8

WHAT WOULD YOU DO IF YOU CAME ACROSS A DOMESTIC WORKER FORCED TO WORK AGAINST THEIR WILL (%)?

	Sweden: aware of trafficking	Sweden: not aware	Thailand: aware of trafficking	Thailand: not aware
Treat like any other worker	0	13	2	0
Give an extra big tip	0	0	0	0
Inform the police	47	20	35	20
Take up with the agency	50	27	55	71
Choose a different worker	25	53	20	40

heard of this phenomenon were more likely to say that they would simply choose a different worker.

Even among those who had heard of trafficking, the share of employers who would report an instance of trafficking into domestic work to the police is far below their sex-worker client counterparts (67% of Swedish and 71% of Thai clients). Two Thai employers said that they would want to report abuse, but not to the police – one stated that she would be too scared of them. In the Italian survey there was no difference between those employing locals and those employing migrants – 75 per cent stated they would report to the police. However, 15 per cent of those who employed migrants stated that if they came across someone who had been forced into domestic work against her will, they would treat her like any other worker. This is in contrast to those employing Italians, none of whom selected this option. Another disturbing difference between the two groups of employers concerned their reaction if they found a worker being violently abused by the employer. Almost a quarter (23%) of those employing migrants stated they would treat her just the same as any other worker. Again, none of those employing Italians gave this response.

4.6 Denying, humanizing and rationalizing the exploitation of unfree/trafficked workers

It is known that some domestic workers are subjected to extreme violence and abuse by employers (Anderson, 1994, 2000). An employer who explicitly intended to confine and subject a domestic worker to slavery-like conditions, would perceive a clear advantage in using a trafficked/unfree person as being less able to resist abuse and exploitation than a “free” worker. However, employers who consciously set out to enslave and torture domestic workers are in a minority. As the sociologist Orlando Patterson observes, “Human beings have always found naked force or coercion a rather messy, if not downright ugly business, however necessary”. Most have therefore sought ways in which to clothe the “beastliness” of power, to popularize a set of ideas which make coercive power “immediately palatable to those who exercise it” (Patterson, 1982: 18). Just as the power of dominant social groups is typically cloaked or justified by discourses that humanize or deny it, so individuals are usually reluctant to view themselves as abusive, dominating, cruel or evil. Whether we are talking about acts of genocide, rape, wife beating or sexual abuse of women and children, the vast majority of people will only use force or coercive power against another human being to the extent that they believe it to be natural, right and justifiable to do so, or when they can conceal from themselves that they are, in fact, exercising such powers (O’Connell Davidson, 2001a). A key question is thus: could “ordinary” employers manage to humanize or deny the exploitation of trafficked/unfree domestic workers? And if so, how?

The interview data suggest that the artifice used – at least by some employers – is, (a) to deem the “private” sphere of the home as entirely disconnected from the social world outside and, (b) to think of domestic workers as objects of, rather than subjects to, a contract. This means that once a worker has entered the home, voluntarily or through coercion by a third party, the employer has certain rights over that person. As one Italian interviewee put it, employers “think they are the owners of their workers and that these are their objects”. Two of the Indian interviewees thought it was justifiable to hit or slap a domestic worker in certain situations, while interviewees at all research sites were often anxious to emphasize that violence was not necessarily the fault of the employer. Meanwhile, the small number of employers who reported having personal experience of employing persons forced into domestic work presented the worker’s situation as something quite external to their own role as employer. It was unfortunate or inconvenient, but had nothing to do with them. Thus, an Indian interviewee remarked on her experience with a 14 or 15-year old girl forced by her family to work and who would not stop crying, “not only did I have to do all the work, but I had to keep part-time help during that time as well”. The same inter-

viewee employed a young woman for many years with whom she felt she had an excellent relationship, until the woman took up with a married man. Her brother-in-law came to take her away and she created a “huge drama”. Only later in the interview did she reveal that, “Her brother-in-law was a real bastard, he tortured her, physically”. In the interviews, such employers did not seem to think of themselves as inhabiting a different moral universe from other employers; indeed, their language was no different from that of other employers who described themselves as having a “friendly and professional” relations with their workers:

I employed her (a Shan woman) because I felt sympathy for her situation. She came from the country with an agent and she was deceived and had to work without payment for one year. She could not go back home because she didn't have enough money and still wanted the opportunity to work. I employed her at that time (Thai widow, aged 75).

Nor did employers necessarily consider it a problem to hand wages and payments to a third party, a relative or an agency, rather than give the money directly to the employee. One Indian NGO providing domestic workers had their wages paid directly into their own account and refused to open personal accounts for the individual workers. One employer challenged this practice by requesting the home address of her worker in order that she could send wages direct to her family. The NGO refused her request. However, both the control exercised by the NGO and the response of the “responsible” employer (i.e. to seek a way to send the worker's wages to her family rather than give the money directly to the woman herself) risk imposing coercive relations on women and girls in a vulnerable situation. The fact that such arrangements are rarely questioned or challenged by employers again suggests that employers view the social relations surrounding the work of the women/girls they employ as external to themselves and beyond their control. This sense that violations of workers' rights were “beyond my control” was also evident in interviews with employers who professed to believe that domestic workers should have certain rights, and yet did not give these rights to their own employees because they worked in the informal economy. Similarly, when asked about abusive employment relations in domestic work, one Swedish employer observed “A lot is happening around us, and some things you don't like, but you have to live with them anyway”.

Employers of domestic workers, in common with most other service consumers, typically desire that their employees actually want to work for them. The favourite employees, who were spoken of in the most glowing and expansive terms, were those for whom the work and its social relations appeared to be a pleasure. This

certainly militates against employing workers who are visibly distressed. And yet, the reference to “helping” which, as we have already noted, is important to managing the relations with live-in workers, can also serve to humanize the exploitation of unfree/trafficked workers. Hence, the Thai employer quoted above can state that she took in one such worker *because* she felt sympathy for her. Several interviewees specifically stated that they employed people only to “help” them, and this was particularly true regarding migrants. The idea of “helping” can be used to “humanize” the exercise of power (in terms of labour control and retention) over workers who are made vulnerable by poverty, their immigration status and isolation, or who have been trafficked or are otherwise coerced by a third party.

Some commentators argue that a system of formalized paid housework within which domestic services are provided by companies, represented a progress on the quasi-feudal model of “domestic service” rightly criticized by many feminists (Meagher, 2002: 62). Whilst we certainly agree that recognizing and regulating domestic work as work, and enhancing the opportunities for labour organization and collective action in pursuit of improved wages and conditions must be central to the efforts to prevent the abuse and exploitation of domestic workers, our pilot research also draws attention to the fact that formalized systems of paid housework could, in principle, comfortably co-exist with the exploitation of trafficked/unfree workers. Thus, for instance, many of the Swedes surveyed did not know the nationality of their worker and had little contact with them, as they were contracted to work through an agency. Some Swedish interviewees presented the employment of domestic workers as a simple purchase of labour, a business relation, but which nevertheless may have racist undertones:

My relation with them is strictly professional. For them, I am a non-person...the ones we had until recently we called “they”: “they” have been here today. I don’t think they know our names either. Our children are very negative towards them because they don’t like the idea that migrants are inside our house... so they call them degrading names (Swedish male business consultant, married, aged 53).

This, or course, does not mean that the domestic workers were unfree/trafficked, but it illustrates the fact that the worker’s situation may be of no concern to the employer, who, in this instance, had obtained them through a home service project. Though the interviewee remarks that “for them, I am a non-person”, more pertinently the rest of his comments suggest that for him “they” were non-people. As such, it seems probable that if “they” happened to be trafficked/unfree, he would regard

the matter in the same way that most consumers of commodities such as fruit, tobacco, coffee, etc. regard the fact that trafficked/unfree workers may have been exploited to make these products available. While consumers of fully commoditized goods sometimes feel that exploitation is, indeed, regrettable, most feel it is beyond their control and concern. This seems to underline the fact that for domestic work to become more commoditized and contractual may benefit migrant workers only if immigration policies are designed to protect rather than penalize migrants, if effective regulatory and monitoring mechanisms are designed and implemented, and if workers are in a position to organize themselves collectively. Until these conditions are met, the asymmetrical power relations that give employers and third parties the power to either harm or help domestic migrant workers will continue, and employers like the Italian quoted below, will be free to either enslave and starve their worker, or not:

The Italians know more about their trade union rights, they are more demanding...foreign workers don't make complaints. The one I used to have would eat just rice. That doesn't mean you can enslave her. This depends on the person, both of the employer and of the worker who allows this (Italian woman, retired university administrator, married, aged 56).

5. CONCLUSIONS AND RECOMMENDATIONS

Demand for both commercial sexual services and the labour of domestic workers, like demand in all markets, is very much a socially, culturally and historically determined matter. It is also intimately related to questions concerning supply or availability; indeed, we could almost say that supply generates demand rather than the other way round. There is no absolute or given level of demand for the services of lap-dancers in any society, for example, and before the relatively recent advent of lap-dance clubs, no one bemoaned their absence. Similarly, and as illustrated by the interview data from western expatriates in Thailand and Hong Kong, the availability, acceptability and affordability of live-in domestic workers can stimulate demand among people who had never before thought of themselves as “needing” to consume large quantities of paid domestic labour on a daily basis.

However, though supply may be a necessary, it is not always a sufficient condition for demand. Demand must also be socially construed in the sense that people have to be made to feel that they want or need a given product or service. Human beings are not born wishing to buy commercial sexual services or to pay someone else to clean, cook and care for them, any more than they are born with specific desires to play the lottery or drink Coca-Cola. They have to *be induced* to feel that it would be pleasurable to pay a stranger for sex, and that it would be convenient or pleasant to have another person to clean after them. Where commercial sex is concerned, they also have to be taught to feel that consuming such services is a sign that they are “having fun”, a marker of their social identity and status as “real men”, “adult”, “not-gay”, or whatever. Where domestic services are concerned, they have to be taught to consider a whole array of household tasks as simultaneously vitally important (if the floors are not mopped and vacuumed every day, family members will develop asthma; if clothes are not ironed your social standing will be diminished) *and* as irksome, lowly and demeaning; they have to learn that employing a domestic worker is a signifier of their social identity and status as middle or upper class, “busy professional”, “woman of leisure”, “good mother and wife”, or whatever

Just as patterns of consumer demand are social and political constructs, so people’s consumption patterns in any given market are a socially determined matter. Those employing domestic workers or buying sexual services do not make decisions on which worker to use or how to treat her in a vacuum, but on the basis of their knowledge of the particular social, legal and institutional context in which they act. It is also important to recognize that while clients and employers of domestic workers may each include their share of crazed psychopaths, the vast majority of those who buy sex and who employ domestic workers are ordinary people. As social beings, they invariably need to feel that their behaviour is normal, natural, necessary

and/or inevitable, and so justified. Prevailing social norms thus play an important role in shaping people's behaviour as consumers in both legal and illegal segments of the commercial sex market, and as employers of domestic workers. Their understanding of these norms is largely determined through peer behaviour and what they can get away with. So, for instance, our interviews with Indian men who bought sex in traditional red light areas and Danish men who bought sex in massage parlours revealed marked and systematic differences between the two groups in terms of their understanding of acceptable practice as sex buyers.³ These variations are unlikely to reflect individual differences of personality, and are more readily explained by the very different sets of socially agreed standards regarding the right and proper way to act in the commercial sex market (ideas that are reinforced by the state's response – or lack of it – to phenomena such as violence by clients and employers against prostitutes, the exploitation of under-age and “trafficked”/unfree prostitutes, and so on).

Indeed, it is depressing how malleable most people are in terms of their morality in any market, and how quickly they can adjust to practices that before they would have considered exploitative, provided that no one stopped them and others appeared to be behaving similarly. This was very clearly illustrated by our interviews with western expatriate employers of domestic workers in Thailand who, in Europe or the USA, would never have dreamt of asking anyone to work a 14-hour day, six or seven days a week for a pittance, but who were quite happy to impose such working conditions on domestic workers in Bangkok, on the grounds that local employers did so and that authorities did not intervene. Similarly, research with western sex tourists to developing countries suggests that their expectations regarding sex workers' prices and practices rapidly shift into line with the prevailing practices of the tourist-related sex trade in the countries they visit (Bishop and Robinson, 1998; O'Connell Davidson, 1998, 2001b).

As far as trafficking is concerned, it is also important to recognize that racism, xenophobia and prejudice against ethnic minority groups make it much easier for sex workers' clients and employers of domestic workers (and indeed employers in the sex industry or in other sectors in general) to convince themselves that such practices are justified. The racially/ethnically different worker is not perceived as an equal human being and so can be used and abused in ways that would be impossible in respect of workers of the same race/ethnicity. The migrant worker comes from an impoverished, “uncivilized”, “backward” country, and so is neither familiar with nor entitled to the rights, freedoms and respect owed to local workers, and even paying them for their labour can be construed as a favour. Women and girls from socially devalued groups and who are socially, politically and economically marginalized are also devalued by both employers and clients, and construed as the “natural” or “ideal” occupants of the lowliest positions in domestic or sex work.

5.1 Policy implications

One reason why policy makers are so concerned with the demand for the services/labour of “trafficked” persons may be seen in the new possibilities this offers for tackling “trafficking” as such. When “trafficking” is construed principally as a phenomenon experienced by women and girls forced into prostitution, eliding customer demand for sexual services and employer demand for cheap labour, measures to suppress demand may superficially appear to represent an effective way forward. However, applied to the many other sectors where large numbers of migrants, internal and international, are grossly abused and exploited to produce cheap goods and services, the idea of clamping down on consumer demand seems a rather less obvious approach.

Even when focusing only on the sex sector, it is not clear that calls for punitive policies against consumers would lead to the desired outcome. Governments are often more than amenable to the introduction of measures to suppress street prostitution and/or other visible forms of prostitution, and such moves are sometimes welcomed as “anti-trafficking” measures (the argument goes that, if there was no demand for street prostitution, it would not be worth anyone’s while to traffick women and children into street prostitution). Leaving aside the many objections to such policies by many groups concerned with the safety, human rights and civil liberties of women who work in street prostitution, it is clear that they are an inadequate response to linkages between consumer demand and the problem of forced labour in the sector as a whole. Clamping down on demand for street prostitution does nothing to address – and may even strengthen – demand in other segments of the market, both legal and illegal, where forced and “trafficked” labour can also be an issue (pornography, escort agency prostitution, lap and table-dance clubs, internet webcam sex, and so on). Of course, it would be possible to extend the logic of the approach to “penalize the buyer” to all forms of sex commerce: a total ban on all forms of sexual entertainment and pornography involving actors/models; raids on private homes and the monitoring of private bank accounts to ensure that people were not using the internet to access sex workers; tapping phones to see whether escort and call girl services were being solicited. But most would balk at the civil liberties implications of such an approach, as well as the financial cost it would imply. Given the political and moral problems posed by a policy of legal suppression, and the fact that individual patterns of consumer behaviour are often established at a very young age, we would argue instead that those who wish to see the commercial sex market shrink rather than continue to expand (and we count ourselves amongst them) need to come up with more creative, less punitive and longer-term strategies.

The research discussed in this report suggests that three related factors are key to explaining the exploitative conditions experienced by many migrant domestic and sex workers: (a) The unregulated nature of the labour market segments in which they work; (b) the abundant supply of exploitable labour and (c) the power and malleability of social norms regulating the behaviour of employers and clients. The continued expansion of any unregulated market is likely to require and facilitate the exploitation of vulnerable labour. Both paid sex and domestic work are peculiar market segments in the sense that there is both political and social unease regarding those who buy and sell in them as workers or consumers/employers. In both sex and domestic work, the absence of effective regulation is one of the factors that help to create an environment in which it is possible and profitable to use unfree labour. It is thus possible to make a case for bringing the sex and domestic work sectors above ground and to regulate them like any other economic sector (Lim, 1998).

However, we must also recognize that both these sectors have features which make it very difficult and very expensive to regulate effectively: for sex work, small units of employment, low start-up costs, rapid turnover of labour and of business establishments, geographic fluidity etc.; for domestic work, the fact that this is necessarily carried out within the private sphere of the household raises very particular issues. The home is construed both as a refuge from the workings of the market (hence the difficulties to introduce market relations, touched on above), but also, and importantly, from the state. To strike a balance between regulating domestic work and the aversion to any state intrusion into private lives, will not be easy. Moreover, regulating domestic and sex work, does nothing, in itself, to counteract racism, xenophobia and prejudice against migrants and ethnic minority groups. Indeed, the desire to apply and enforce labour standards can co-exist with the objective to drive migrant women out of these sectors. Unless governments do something to address the social devaluation of migrants, and their social, political and economic marginalization, regulation may merely serve to reinforce existing racial, ethnic and national hierarchies in the sex industry and in domestic work.

The factors that expose migrants to exploitation are linked to questions about immigration/citizenship status, lack of access to support networks and economic status. Of course, immigration and citizenship issues do not only apply to cross-border migrants; indeed, minorities in many countries and, specifically with regard to the present study, in India and Thailand, have a particular status short of full citizenship, even if they are born in a state, and this often affects their freedom to move. Both internal and international migration can create dependence on employers, whether they are private householders, pimps, gangsters, entrepreneurs, or business operators. Regular migrants may require employers to validate their immigration

status, but when they are undocumented they require their cooperation to not reveal their status. In some sectors this may cause particular problems for the migrant, for instance when the employer has the potential to exercise a high degree of personal power over the worker either because the work is unregulated or even illegal, or because workers are isolated, or depend on the employer for other needs such as accommodation, food, and so on. Both domestic and sex work fall into such categories. Dependence is heightened by lack of access to support, and migrants, internal and international, often do not have kin or friendship networks to fall back on.

For those working in the domestic service and sex sectors, access to more formalized organizations may also be limited for structural and institutional reasons – trade unions typically do not organize in these areas, and other forms of organization in associations, guilds, cooperatives and the like may exclude migrants. If they do not exclude them, employers may well make it extremely difficult for migrants to participate (75% of employers of domestic workers in our survey thought that domestic workers had no right to join trade unions). Moreover, while domestic and sex work are complex sectors with those at the top end enjoying relatively good working conditions and relatively high earnings, migrants and undocumented migrants in particular, are more likely to be found working at the bottom end of the hierarchy, where their low earnings and weak economic power further increase their dependence. Both migrant sex and domestic workers are, thus, often trapped by multiple levels of dependence. Employers of domestic workers interviewed for this research were clear that this dependence meant migrants worked harder and were less likely to leave, in other words, far easier to exploit. Similarly, a proportion of the clients interviewed and surveyed clearly identified the vulnerability of migrant sex workers as a boon in terms of obtaining “value for money”.

In order to develop policies to limit the exploitation and abuse of migrant sex and domestic workers it is thus necessary not merely to attempt to regulate markets, but also to address areas of vulnerability outlined above. States have means at their disposal that would significantly change markets and thus the possibilities for exploiting unfree labour, the most obvious being steps to limit workers’ dependence on employers for the right to stay. Expanding opportunities for women to legally migrate would help to reduce the “push” into the domestic and sex sectors, since at present these sectors offer the only earning opportunities open to many female migrants. Non-state actors also have a role to play in networking and facilitating the organizing of migrant women in these sectors.

However, we must recognize that even if a well-regulated formal sector were established, illegal or informal market segments would not automatically or neces-

sarily disappear. Thus, we find that in countries such as France, for example, where there is some regulation of domestic labour and organizing of domestic workers, migrants, particularly undocumented migrants, continue to work in the informal economy, often under very exploitative conditions. More generally we can say that sex commerce and domestic work in private households often takes place in what might be termed an “economy of makeshifts” which stands outside “civil society” understood as “a social, cultural and ethical system made up of the market, the legal system and voluntary associations to promote the welfare of the community” (Brace, 2002: 334). This is one of the reasons why these sectors are stigmatized, but also why those who are at the margins of civil society (e.g. poor women, runaway teenagers, undocumented migrants) often turn to it as a practical means for survival. Such people rarely view prostitution or domestic work as a desirable occupation, it is just a strategy to get by. Even if certain aspects of sexual commerce were professionalized and/or incorporated into the “moral economy” and recognized as a form of work, legal, protected sex work would no longer be open to these groups nor, indeed, would everyone who turns to prostitution as a survival strategy even wish to be incorporated into civil society as a “sex worker”. The same points hold good in relation to domestic work.

And so long as there are people who are forced to get by in a makeshift economy, there will be people who are vulnerable to abuse and exploitation by pimps and other third parties. The markets for sex and domestic work are complex and differentiated, and one cannot assume that establishing and monitoring labour standards would necessarily address the situation of *all* those who currently work there. When regional and cross-national economic, political and social differences are factored into the analysis, the idea of devising a single strategy to protect and promote the interests of all those who prostitute themselves, or all those who work in domestic service, becomes even more unrealistic. We would therefore urge policy makers to pay much closer attention to the unintended and negative consequences of legislating prostitution (however formulated), or of regulating (or the lack of it) domestic work and care services, and of immigration and citizenship laws for different groups involved. For example, the development of cash for care schemes, such as the Italian system of local payments to families who care for their elderly or handicapped relatives, has the unintended effect of significantly increasing the number of undocumented migrants doing this work for extremely low wages in private households. There is a definite need for “coordinated thinking” across different policy areas.

There is also a need for more creative engagement regarding questions on the construction of these markets. As we have emphasized throughout this study, what is socially acceptable behaviour among peer groups is an extremely important determin-

ant of how employers and clients behave towards domestic and sex workers. Employers and clients must be encouraged to raise rather than lower acceptable standards of behaviour. Regulation of markets must then be framed within and in accordance with a broader public awareness programme; for, in the final analysis, it will be peers who police the margins.

ENDNOTES

1. United Nations General Assembly, Document A/55/383, Crime Prevention and Criminal Justice, Convention Against Transnational Organized Crime, Annex II, Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Palermo, Italy, 12-15 December 2000.
2. Their inability to freely leave the exploitative situation may be because they have been sold or tricked into forced labour or slavery-like conditions by a trafficker. But it could equally be that they have migrated through legal channels, yet are unable to retract because their employer (or other exploiter) has confiscated their passport, withheld their wages, or uses physical force or threats to prevent them from quitting. Alternatively, they may be locked into a relationship with their exploiter through debt, through fear of arrest and deportation for immigration offences if they complain about their conditions or attempt to leave, or through drug addiction.
3. The Danish interviewees were all white Danish men who were relatively experienced as clients, and who preferred to buy sex from women working in massage parlours. Massage parlour prostitution constitutes the largest part of the commercial sexual services market in Denmark.

REFERENCES

- Agustín, L.
2002 "Challenging 'place': Leaving home for sex", *Development*, 45(1): 110-16.
- AMC
2000 *Asian Migrant Yearbook 2000: Migration Facts, Analysis and Issues in 1999*, Asian Migrant Centre, Hong Kong.
- Anderson, B.
1994 *Britain's Secret Slaves*, Anti-Slavery International, London.
2000 *Doing the Dirty Work? The Global Politics of Domestic Labour*, Zed, London.
- Anderson, B., and J. O'Connell Davidson
2002 *Trafficking: A Demand Led Problem?*, Save the Children Sweden, Stockholm.
- Andrijasevic, R.
2003 "The difference borders make: (il)legality, migration and 'trafficking' in Italy among 'eastern' European women in prostitution", in S. Ahmed, C. Castaneda, A. Fortier and M. Sheller (Eds), *Uprootings/Regroundings: Questions of Home and Migration*, Berg, Forthcoming.
- ASEM
2001 ASEM Action Plan to Combat Trafficking in Persons, Especially Women and Children: An initiative from Sweden, Thailand and the Philippines, ASEM Foreign Ministers' Meeting, Beijing, 24-25 May.
- Barbic, A., and I. Miklavcic-Brezigar
1999 "Domestic work abroad: a necessity and an opportunity for rural women from the Goriska borderland region of Slovenia", in J. Momsen (Ed.), *Gender, Migration and Domestic Service*, Routledge, London.
- Bernstein, E.
2001 "The meaning of the purchase: Desire, demand and the commerce of sex", *Ethnography*, (2)3: 389-420.
- Bishop, R., and L. Robinson
1998 *Nightmarket: Sexual Cultures and the Thai Economic Miracle*, Routledge, London.
- Blackett, A.
1999 *Making Domestic Work Visible: The Case for Specific Regulation*, ILO, Geneva.
- Brace, L.
2002 "The tragedy of the freelance hustler: Hegel, gender and civil society", *Contemporary Political Theory*, (1): 329-347.
- Doezema, J.
2001 "Ouch! Western feminists' 'wounded attachment' to the 'third world prostitute'", *Feminist Review*, (67): 16-38.
- Gallagher, A.
2002 "Trafficking, smuggling and human rights: tricks and treaties", *Forced Migration Review* (12): 25-28.
- Gunther, A.
1998 "Sex tourism without sex tourists", in M. Opperman (Ed.), *Sex Tourism and Prostitution*, Cognizant Communication Corporation, New York.

ILO (International Labour Office)

- 2002 “Getting at the roots: Stopping exploitation of migrant workers by organized crime”, International Labour Office, Paper presented to International Symposium on the UN Convention Against Transnational Organized Crime: Requirements for Effective Implementation, Turin, 22-23 February.

Meager, G.

- 2002 “Is it wrong to pay for housework?”, *Hypatia*, (17)2: 52-66.

Morrison, J.

- 2000 “The policy implications arising from the trafficking and smuggling of refugees into Europe”, Documentation of the European Conference Children First and Foremost Policies towards Separated Children in Europe, Save the Children Sweden, Stockholm.

O’Connell Davidson, J.

- 1998 *Prostitution, Power and Freedom*, Polity, Cambridge.
2001a “The sex exploiter”, Theme paper for the Second World Congress Against the Commercial Sexual Exploitation of Children, Yokohama, December.
2001b “The sex tourist, the expatriate, his ex-wife and her ‘other’: The politics of loss, difference and desire”, *Sexualities*, (4)1: 5-24.

Patterson, O.

- 1982 *Slavery and Social Death*, Harvard University Press, Cambridge, MA.

Phongpaichit, P.

- 1999 “Trafficking in people in Thailand”, in P. Williams (Ed.), *Illegal Immigration and Commercial Sex: The New Slave Trade*, Frank Cass, London.

Raymond, J.

- 2001 Guide to the New UN Trafficking Protocol, CATW, North Amherst, MA.

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The 2001 ASEM Action Plan to Combat Trafficking in Persons, Especially Women and Children stressed the need to encourage research on the demand for the most common forms of exploitation of trafficked women and children, in particular for commercial sex services, and recommended a multi-country study into the demand side of trafficking as one of its follow-up actions.

In response to this recommendation, the Swedish Ministry of Foreign Affairs, Sida and Save the Children Sweden, commissioned this pilot research study on the demand underlying two sectors where labour/services of trafficked persons are known to be subject to exploitation: prostitution and domestic work. This report sets out some of the findings of the pilot study and ongoing research concerning employer demand for domestic workers in private households, and consumer demand for commercial sexual services in selected European and Asian countries.

