Sex worker unionisation: an exploratory study of emerging collective organisation **Gregor Gall**

ABSTRACT

In a number of Western economies in the last two decades, sex workers have begun to organise themselves in, and be organised by, trade unions for the first time. This article examines the salient processes and outcomes of this phenomenon. It firstly explores the influence of the prostitutes' rights movements and the emergence of the 'sex work' discourse where the selling of sex and sexual services are regarded as a form of 'emotional' or 'erotic' labour. The advances in sex worker union organisation are recounted before assessing the forces leading to unionisation and those forces that act as impediments to unionisation. The conclusion of the article is that extant sex worker unionisation is a fragile and embryonic phenomenon.

INTRODUCTION

Throughout many countries in the last decade, an array of sex workers ranging from prostitutes (street, brothel, escort) to exotic dancers (strippers, table and lap dancers), pornographic models and actors/actresses, and sex chatline telephone operators have begun to organise themselves in, and be organised by, trade unions for the first time. This article examines the processes and outcomes of this phenomenon of sex workers in seven countries beginning to take the first small steps towards the process of unionisation. Thus, in Australia, Canada, Germany, the Netherlands and New Zealand, this development mainly concerns prostitutes, while in Britain and the USA, it mainly concerns exotic dancers. The first steps towards sex worker unionisation have taken place following two turning points in the 1970s and 1980s, namely the emergence of the 'sex work' discourse where the selling of sex and sexual services are regarded as a form of 'emotional' or 'erotic' labour, and the self-organisation of prostitutes into prostitutes' rights groups. These antecedents facilitated sex workers defining themselves, and being defined, as wider than just comprising prostitutes and provided an inspiration for the creation of the self-representation of sex workers' interests. However, unlike the prostitutes' rights groups, the current sex worker organisations decided to constitute themselves as trade unions rather than as pressure groups. This follows from their assessment that the prostitutes' rights groups experienced severe weaknesses as a result of focusing first on primarily civil and human rights in law and not on

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economic rights, labour rights and workers' rights, and second on operating as pressure groups without extensive membership bases and significant member participation and involvement. Consequently, sex worker union organisations focus far more on work issues within the workplace.

The significance of sex worker unionisation lies in a number of areas. First, sex workers have never hitherto sought to unionise. Historically speaking, they may be said to be part of a third wave of unionisation after manual or 'blue-collar' workers and then non-manual or 'white-collar' workers. In this regard, sex work has been dubbed as 'red-collar' work (Brewis and Linstead, 1998). Second, the sex industry is an increasingly large and integral part of economic activity. The global sex industry has been estimated to generate between \$30 billion and \$50 billion per annum in sales from the late 1990s onwards (Hughes, 2000: 12, New Atlantis magazine, summer 2004, Sunday Times, 18 September 2005), of which pornography and prostitution are believed to be the major components, and the major markets are found in Australasia, North America and Europe (Lane, 2000; Malarek, 2003). The sex industry now pervades Western societies in an increasingly prevalent manner (see e.g. New Statesman, 7 March, 4 April 2005). 'Exotic dancing' is proportionately more prevalent in the USA and Britain than the other five countries while prostitution is proportionately more establishment-based in Australia and the Netherlands than in the other five countries. Third, sex work and sex workers represent a form of 'atypical' work and workers, whereby working patterns and forms of work organisation are non-standard, and there is often no employer so that no employment contract exists, implied or otherwise. Fourth, sex work is one component of the ever-expanding private service sector, where unionisation has traditionally been weak. Last, sex workers are overwhelmingly women (between 90 and 95 per cent), and a significant proportion are women from minority ethnic groups. Among these groups, trade unions, again, have traditionally had a relatively weak presence.

Consequently, it is surprising that researchers in neither gender studies nor the sociology of work have examined the phenomenon of sex worker unionisation. In this, the article breaks new ground. It begins by laying out the research methods deployed. This then leads to an identification of the extent of sex worker unionisation and its predominant characteristics. From here, the antecedents to unionisation are explained and assessed, followed by a discussion of the forces comprising the trajectory to unionisation. This discussion is then contextualised by a consideration of the forces acting as a bulwark against unionisation.

The unionisation of sex workers and the study of this process is a contentious subject for many, and in particular a certain milieu of feminist thought, because such unionisation can stand accused of legitimising and normalising the super-exploitation and commodification of women, their bodies and their sexuality as objects of both capitalism and male power. This perspective flowed organically from one side of the longstanding debate, dubbed as the 'feminist sex wars', over degrees of compulsion and choice in prostitution. While the possibility and probability of such legitimisation and normalisation needs to be readily acknowledged, one part of the contending perspective argues that, notwithstanding the gendered and non-economic aspects of sex work, the issue of whether or not unionisation does generate such outcomes is not different to the dilemma faced by trade unionism per se under capitalism. Anderson (1967) and Hyman (1983) have argued that trade unionism has become enmeshed with, and by, capitalism because trade unionism is both an opposition to, and a component of, capitalism. By struggling under and within capitalism, trade unionism

can also stand accused of legitimising and normalising the system of exploitation and oppression represented by capitalism. However, this problem has not prevented engagement in a trade union struggle with the aim of attaining better terms for labour in the wage–effort bargain and/or a wider transformation of society. Therefore, it can be suggested that the unionisation of sex workers may be seen as an appropriate way of reducing exploitation in the sex industry as well as offering the potential to transform the sex industry itself through workers' control (see Gall, 2006).

RESEARCH METHODS

The approach to gathering data for this research has not been the standard fare of conducting interviews with, and disseminating questionnaires to, the subjects of the research, that is, sex workers, in order to generate primary data. Studying unionisation and union organisation among sex workers presented a number of difficulties. Most sex workers are not visible for the purposes of contacting them. Street working prostitutes represent, as it were, only a tip of an iceberg. Access following identification is also difficult and sometimes dangerous, and sex workers often wish to retain their anonymity. These problems are accentuated by the researcher being male where most sex workers are female in an industry dominated by heterosexuality and sexism. The research was also carried out with meagre resources despite applying for grant funding. (The inability to gain funding is likely to be an indication of the relative weakness of the 'sex work' discourse in wider society.)

Nonetheless, the force of these limitations were lessened and ameliorated in a number of ways. First, sex workers themselves have been extremely active in writing about their own work experiences and debating their analyses of these as part of their desire for self-expression and self-understanding and, most crucially, as part of their struggle to have 'sex work' recognised as a legitimate work by sex workers and wider society (see e.g. Bremme and Mitrovic, 2004; Clamen and Lopes, 2003; Kempadoo, 1998; Lopes, 2001). These writings have spanned the range of sex work rather than just being about prostitution. In particular, sex worker union activists have been prolific in their writings, largely because these have formed a key medium by which to attempt to reach other sex workers with a view to unionisation and union mobilisation. Second, and reflecting the desire to reach other sex workers and to gain legitimacy for the sex work discourse, sex worker union activists have sought to use the media to their benefit. The media, in turn, has been keen to take up these overtures by dint of 'sex' being deemed newsworthy because it is 'sexy' and interesting. Some of these interests come from titillation, some from genuine curiosity, some from new feminist concerns and some from concerns about the 'lot of the workers'. This material has been accessed through the Lexis-Nexis electronic database of newspapers and magazines. Third, the sex industry, broadly defined, has its own unofficial communication mediums like world-sex-news.com and the adult industry news service ain.com, which act as posting services.

Using these sources has its disadvantages. In the former, agendas set and areas covered emanated from the sex workers themselves, not the researcher, where the purpose has been debate and proselytising. In the second, coverage can be sporadic, often being a response to press releases of sex worker union activists and not an independent enquiry. In the last, again, coverage has been sporadic and skewed towards an 'industry' (though not necessarily an 'employer') overview. However, the extent of these disadvantages in the first two was relatively limited because the specific

agenda of the objective of unionisation set the parameters. More important, some triangulation was achieved and research questions were pursued using other resources. Twenty structured interviews were conducted with 16 relevant full-time officials, union activists and sex workers (escorts and exotic dancers) of the GMB-Britain's general union in Britain. Twelve structured email dialogues of several months' duration each were entered into with lay activists and paid officers of the International Union of Sex Workers (IUSW), the American Federation of Labor-Congress of Industrial Organisations (AFL-CIO), the Canadian Guild of Erotic Labour (CGEL), the Dutch FNV workers' union confederation, the Australian Liquor, Hospitality and Miscellaneous Workers' Union (LHMWU), the German public sector union, Ver.di, and the New Zealand Prostitutes' Collective. Furthermore, as the study is an exploratory one of an emerging phenomenon where it presents a broad overview of the salient issues and processes in terms of what is, in effect, a social movement, the research methods have been commensurate with this status and are appropriate to the (macro) units of analysis under study. In this sense, such an overview is compatible with the initial setting out of the parameters of the processes, as opposed to a case-study (of a lower unit of analysis) approach, which would pay more attention to specific contextual factors across time and space. The seven countries studied were chosen as Western countries where the developments in sex worker unionisation were the most advanced to date (cf. a brief survey of other countries in Gall, 2006: 153-156).

A SURVEY OF SEX WORKER UNION ORGANISING

The following survey of sex worker unionisation is inclusive of the main developments in the seven countries without being exhaustive. It comprises small but significant developments: small in an embryonic manner given the sex industry's size but significant in that they may represent the beginning of a bigger trend. Starting in Britain, seven lap-dancing clubs are unionised for which the GMB has two union recognition agreements. There is also a unionised brothel. The GMB, after the London-based IUSW joined with it in 2002, is primarily targeting lap dancing because of the clubs' desire to have a code of conduct agreed with their dancers, through an independent body (i.e. a union) because this helps gain the necessary local authority entertainment licences. Membership totals about 2,000 sex workers. In Germany, from 2002 Ver.di has been recruiting and organising prostitutes in major cities like Dortmund and Hamburg, where in the latter it has helped set up a works council in one brothel. A proposed collective contract devised by Ver.di was rejected by the 100 members as a result of fear of loss of anonymity and work flexibility. However, collective citywide contracts between prostitutes and their 'employers' now exist in cases. In the Netherlands in 2002, the long-standing Red Thread prostitutes' rights group established a union that became part of the FNV union confederation, with the FNV helping it organise and represent prostitutes. Membership rose to around 100 before a financial crisis in 2004, resulting from government funding being withdrawn, put the union's organisation amongst sex workers into jeopardy. Although it then gained some emergency funding, this still left it in a precarious position.

In the USA, after a long struggle at the Lusty Lady peepshow in San Francisco, the dancers unionised and gained union recognition in 1996 through the Exotic Dancers' Alliance (EDA). Following closure by the employer, the dancers and other staff bought the club, turning it into a workers' cooperative in 2003. Between 1993

and 1996, Pacer's in San Diego was both unionised and had a union recognition but staff turnover allowed the employer to win a derecognition election. Elsewhere, dancers have unionised but failed to gain union recognition in Seattle, Anchorage, Philadelphia and Las Vegas. Such unionisation has been orchestrated with the help of the Service Employees' International Union (SEIU) and Hotel Employees' and Restaurant Employees' unions. After the winding down of the Exotic Dancers' Alliance in 2004, the Sex Workers Organised for Labour, Human and Civil Rights was formed, representing primarily exotic dancers. Elsewhere, porn actors and actresses in the Californian San Fernando Valley, the largest single location of pornography production, again tried to unionise in 2004, following several earlier unsuccessful attempts in 1993 and 1998. However, little headway has been made.

In Canada, the Canadian Guild for Erotic Labour, established in 2004, has sought to convince other unions to help it organise prostitutes and exotic dancers. Following the collapse of both the (Canadian) Exotic Dancers' Association and the Exotic Dancers' Association Canada in 2002 and before that the failure of both the Canadian Association for Burlesque Entertainers and the Association for Burlesque Entertainers, the Strippers United Association was formed in 2004. In Australia, two prostitutes' rights groups (Workers in the Sex Industry and the Prostitutes' Collective of Victoria) joined the LHMWU in 1995 to recruit prostitutes to the union. The initial momentum here has been lost as a result of meeting intra- and extra-union hostility so that low-key recruitment is carried out through sex work support projects rather than directly. The prime hostility has taken the form of an unwillingness by different bodies in the LHMWU to provide further resources following a short period of support based upon an exacting 'make or break' rationale. In 2002, the Striptease Artists of Australia (SAA) was formed as a union to represent lap dancers and strippers. It gained an industry-wide bargaining award through the Australian Industrial Relations Commission in 2006. Meanwhile, UNITE in New Zealand began to organise prostitutes and striptease dancers in 2004.

The activities of the various unions have comprised a number of facets. Most obviously, they have sought to develop their workplace and extra-workplace influence by recruiting and organising sex workers while establishing alliances with other pressure groups at the same time to influence legal regulation, public policy and social attitudes. Both have necessitated considerable internal discussion and policy development work. In conventional terms, individual member representation to establishment owners and public authorities concerning grievance and disciplinary issues (see later discussions) has been undertaken. In Australia, Germany and the USA, the unions have sought to avail themselves of statutory forms of worker representation and employment regulation in order to pursue members' interests. Where relatively stable collective union presence and union recognition have been established in clubs like the Lusty Lady or Majingos in London, and brothels in Australia and the Netherlands, unions have engaged in collective bargaining and collective representation over terms and conditions such as minimum wages, payment for on-call hours, and health and safety. But given the weakness of the nascent sex worker union organisations, elsewhere the emphasis of representational work has been largely individual member based.

NEW AND EXISTING UNIONISM

Sex worker unionisation has consisted of a mixture of unionisation through existing and hitherto never existent union organisations. On one side of the spectrum, this

process ranges from an existing union organising sex workers primarily of its own volition (Ver.di in Germany) through an existing union amalgamating the efforts of an organisation of sex work activists within itself (GMB in Britain, LHMWU in Australia). On the other side, the process also ranges from a completely new union being established (SAA in Australia, Las Vegas Dancers' Association in the USA) to a new quasi-union becoming part of an existing union (Red Thread-FNV in the Netherlands, EDA-SEIU in the USA). The two sides of the spectrum meet around the proximity of an existing union amalgamating the efforts of an organisation of sex work activists within itself to a new quasi-union becoming part of an existing union. The differences across the spectrum reflect a number of phenomena, namely the independent strength of initial sex work union milieus, the presence or absence (and degree) of positive responsiveness of existing unions, the extent of available autonomy within existing receptive unions, and the character of trade union and union recognition legislation. Whether existing unions responded positively or not was the sum of internal debates, ideologies and power relations within the unions concerned.

FORMS OF TRADE UNION IDENTITY AND APPROACH

The 'newness' of sex worker union organisation as well as the hostile and inhospitable conditions under which it has emerged and the current weakness of sex worker union organisation help to explain why the orientations of sex worker union organisations and their activists comprise a range of varieties. Trade unionism has a number of generic identities: (i) guild, (ii) friendly society, (iii) company union, (iv) social partner and (v) social movement (Hyman, 2001). 'Guild' is defined as an exclusive approach to establishing the status of an occupation for its membership, 'friendly society' is defined as a mutual insurance, consumer and representational organisation for its membership, and 'company union' is defined as a cooperative productivity coalition with management. 'Social partner' seeks to promote social welfare and economic changes to benefit its members and workers through a dialogue with the government, while 'social movement' seeks to provide a broad notion of representation for its members and workers through broad campaigning and mobilisation. To this, one could add the category of the 'workers' union' (see Kelly, 1996, on militant unionism), which has a material constituency of its own members as well as a broader ideological constituency of workers in class terms and which pursues these interests through the lens and means of 'militant' oppositionalism.

In different degrees for individual organisations and in different degrees within different countries, aspects of each can be detected (see Gall, 2006: 65–159). For example, the notion of a guild has been prevalent where some sex worker activists have sought to pursue the path of creating a profession as a method of attaining legitimacy and control (e.g. IUSW in Britain and the CGEL in Canada) while that of friendly society has also been in evidence in terms of a 'servicing' relationship (e.g. the GMB in Britain and Ver.di in Germany). The concepts of both 'company union' and 'social partner', respectively, can also be detected where sex worker union organisations have sought to create a meaningful dialogue with employers over 'industry standards' and with governments over legal reform, wage regulation and social protection (e.g. the Red Thread in the Netherlands). In this, the aims and *modus operandi* of prostitutes' rights groups have been retained. Sometimes the approach of 'social

movementism' has been used to try to help garner community influence in order to attempt to sway employers and governments (e.g. SEIU in the USA). Finally, the notion of the 'workers' union' can be detected in some statements, as opposed to the actions of the sex worker union organisations. This is most apparent in the statements of the IUSW/GMB.

SEX AS WORK: WORK AS SEX

The conceptual fulcrum for organising sex workers is the discourse of viewing sex workers as workers whose labour, whether emotional or erotic, is deemed to have three qualities (Bell, 1987; Delacoste and Alexander, 1987; McClintock, 1993; Pheterson, 1989). The first is of 'sex work' being of a sufficient level of moral legitimacy to be deemed worthy of and acceptable to organise. The second is that sex work has a social worth as a form of employment that is seen as to be comparable to other forms of labour and paid employment. The third is that sex work is characterised by conventional forms of work organisation. The perspective is also of sex workers selling sexual services and not their bodies and persons per se. Distinctions are not made between acts involving the selling of sex and acts of selling sexual stimulation, but between those acts that involve entering a body, acting on another body or entering personal body spaces (such as intimate closeness) and those that involve the production of imagery. Sex work is viewed as comprising of work that can be socially useful and can provide job satisfaction, personal fulfilment, empowerment and selfactualisation, where becoming a sex worker can be a genuine life choice. The conditions of this potentiality are argued to be existent in the present and to be potentially further enhanced in the future under different conditions. However, it is recognised that alongside these potential benefits, there are downsides in terms of violence, stigmatisation, poor pay and conditions of employment, and job insecurity, but these can be ameliorated through regulation and interest representation. Of critical importance for interest representation is that the sex workers, aided by supporters such as liberal and libertarian feminists, developed the discourse themselves. Moreover, without it, or at least certain parts of it, it is inconceivable that sex worker unionisation is conceptually or practically possible. Under it, sex workers are not viewed necessarily as victims or as helpless. Rather, they are conferred with agency, rights and legitimacy.

ANTECEDENTS TO UNIONISATION

Almost exclusively prior to the mid-1980s, where there existed any collective organisations of sex workers, these were collective organisations of prostitutes where prostitutes themselves and an array of supporters constituted pressure groups to campaign for the general improvement in the legal, political and social conditions of prostitutes (Chapkiss, 1997; Jenness, 1990; 1993; Mathieu, 2003; Outshoorn, 2004; Poel, 1995; Weitzer, 1991; 2000; West, 2000). The modern prostitutes' rights movement began in San Francisco in 1973 with the creation of Call Off Your Old Tired Ethics (COYOTE) (Jenness, 1993). It sought to repeal the existing prostitution law, empower prostitutes to bargain with their 'employers', educate the public on prostitution, end stigmatisation and campaign for health provision. COYOTE formed a seminal component in the creation and dissemination of the sex work discourse. In particular, it argued that

most of the problems associated with prostitution (and sex work) related to its prohibition and stigmatisation. A series of similar organisations, often affiliates of COYOTE, were set up in the following years in another 20 US cities. In Europe, the prostitutes' rights movement emerged following the example of COYOTE and with the fillip represented by the actions of French prostitutes in occupying churches in 1974 (Pheterson, 1989). For example, the English Collective of Prostitutes was established in 1975 with other such organisations in Western countries being established in the following 10 years.

However, all of these organisations experienced deep-seated and extensive problems after initial bursts of enthusiasm and effort in terms of achieving radical law reform, public toleration, de-stigmatisation and material improvements in conditions of work (Jenness, 1990; 1993; Mathieu, 2003; Poel, 1995; Weitzer, 1991; 2000). The sources of problems, these authors argued, revolved around lack of resources and marginalisation in society. First, prostitutes' rights groups did not operate as membership-based organisations of prostitutes, which levy subscriptions, create democratic structures, use participative processes of forming policies and deploy elected positions. Instead, they became dependent on small milieus of self-selected charismatic leaders and nonprostitute supporters. Second, they experienced an inability to construct alliances with other groups such as feminists and trade unionists. Third, they then faced a counteroffensive following the ascendancy of the 'moral majority' after the rise of HIV/AIDS that scapegoated prostitutes as problems of health and morality. This compelled these groups to concentrate their work on health (of prostitutes) and education (of public stereotyping) issues and away from civil and human rights. Of course, these problems were not wholly of the prostitutes' rights groups' making, but in attempting to overcome marginalisation and stigmatisation, their activities became influenced and distorted by these phenomena.

TOWARDS TRADE UNIONISM

The very significant organising and political difficulties experienced by the prostitutes' rights groups as well as the spread of the sex work discourse to sex workers outside of prostitution created a situation where the notion of trade unionism began to have a purchase among some sex workers. Thus, the transition from largely focusing on civil and political rights (see West, 2000) to a far greater concentration on economic and worker rights, and from embodying pressure group activity to organising in a union manner, constitute two critical developments. Many sex workers have taken inspiration from the self-organisation of prostitutes' rights groups and came to the conclusion that they did not go far enough. Thus, for example, under sex worker unionisation, the practices of creating membership-based organisations, which levy subscriptions and use democratic structures and participative processes to form policies and to elect officers, has been prioritised far more so. Two questions then arise, concerning: (i) why sex workers have become open to union organising and (ii) why unions have become open to organising sex workers. The motivation of both parties to 'organise' can be seen as necessary but not sufficient to lead to actual recruitment and organisation for motivation per se does not guarantee desired outcomes. However, it is hard to see recruitment and organisation taking place without the prerequisite of this two-sided motivation.

Why have sex workers become open to union organising?

The starting point for subsequent factors to come into play has been the prominence of the 'sex work' discourse. This has been a necessary but (on its own) insufficient condition to lead to the first steps towards unionisation. Becoming a 'sex worker' signifies that this self-ascribed categorisation suggests individuals are *likely* to *perceive* that they have interests that are different and separate from, as well as possibly in conflict with, the interests of other groups within the sex industry, primarily the *de facto* and *de jure* employers such as brothel and club owners, and the clients with whom they negotiate over the pay and conditions of the sexual services. At the very least, the use of the term 'worker' suggests that such individuals do not comprise one of the most powerful groups in the industry and are thus unable to have their interests fully pursued and represented without taking a deliberate collective action. At the same time, the language of the sex worker as entrepreneur is not prominent. Therefore, it is likely that in conceptual terms at least there is a rationale, if not need, for the collective representation of sex workers' interests. But representation need not necessarily take the form of *union* representation.

Unionisation has taken place where certain advances in thought and consciousness have taken place, comprising six elements (see Gall, 2006: 160-186). First, a transition from the perspective of self-help in society to self-activity in the workplace, although still retaining the self-help aspect of promotion of collective interests where the rights of sex workers are recognised to be shaped and influenced by processes outwith the workplace. Second, an increasing focus on the self-activity of members as the source of influence to change their working environments and less emphasis on the activities of opinion leaders and advice specialists, who are not sex workers themselves, as a modus operandi. Concomitantly, the orientation is on larger numbers of directly involved workers. Third, a recognition of the inadequacy of civil and human rights on their own to gain objectives and thus a widening out to also pursue worker and union rights. Part of this comprises the recognition that even with rights in law, sex workers require a collective body of their own in the workplace to help oversee the implementation or actualisation of these rights. Thus, campaigning for salient legal reforms and the establishment of a charter of sex workers' rights has become deprioritised. Fourth, an increasing focus on improving the terms of exchange/the wageeffort bargain at the workplace in conventional trade union terms deploying collective leverage. Fifth, activities that can be described as union actions and behaviours whereas before sex workers' collective organisations were 'trade unions' either in name only or with conventional issues of wages and conditions being only a formal focus of attention (see e.g. Baxandall, 2002; English Collective of Prostitutes Network newsletter, June 1984; Jenness, 1990: 403). Sixth, sex worker union organisations have taken up and attempted to further build on the discourse and form used by the prostitutes' rights groups of social movementism. Here the discourse and language focus on demanding 'dignity', 'justice' and 'respect'.

These conceptual advances took place alongside and became interrelated to two significant material developments. One was the significant change in the regimes of state regulation of sex work. Moves towards decriminalisation and legalisation of prostitution have led to forms of state regulation that created stimuli to union organising by virtue of generating a series of leverage points and bargaining issues. Most obviously, there are the social wage benefits that are more accessible through unionisation and the possibility of exercising leverage over local public authority regulation

of brothels and massage parlours via collective organisation. In terms of wider sex work, the growth of exotic dancing has led to an increasing array of regulation by local public authorities as they seek to manage this enlarged form of economic activity. Regulation, rather than prohibition, has helped tip the relative balance in society towards greater legitimacy rather than greater illegitimacy so that the risks and stigma associated with sex work have become lessened. In these circumstances, some sex workers are now relatively more willing to reveal themselves as sex workers openly in public, and this has helped unionisation by allowing sex workers to assert their rights both individually and collectively.

The other material development concerns the generation of what are now regarded as actionable workplace grievances and sex workers' perception of the refusal of owners and employers to adequately address these (see Kelly, 1998). Across sex workers, two generic grievances exist. Most sex workers are not deemed by the law or by employers to be employed. Instead, they are categorised as self-employed 'independent contractors'. Consequently, they have no job security, no guarantee of earnings, no healthcare provision, employment insurance and so on. The second is that, despite being deemed as 'independent contractors', they are subject to controls over their employment like work patterns, pace of work and content of work. However, different groups of sex workers have specific manifestations of these grievances as well as further different grievances (Inset 1).

Inset 1 Specific sub-group grievances

Brothel or Parlour and Escort Agency Prostitutes. Charges for working ('fees'), 'tools of the trade' such as linen, sexual aids, condoms and lubricants, and for on-site food and drinks, mandatory tips to staff, determination of client charges, exercise of codes of conduct on behaviour (time keeping, refusal of customers, use of drugs and alcohol), discipline and monitoring, personal safety, health and safety of working conditions, job insecurity and victimisation (see e.g. Brewis and Linstead, 2000a; 2000b; 2000c).

Independent Prostitutes (street and self-employed prostitute). Issues concern personal safety, police harassment, the right to run an 'immoral' business, the right to have partners live off 'immoral' earnings, the use of business cards, compulsory health testing, and availability of health services.

Exotic Dancers (strippers, nude dancers, lap dancers, table dancers, burlesque). Fees for working, fines and charges, pay rates, working conditions concerning dressing rooms, nature of interaction with customers and poor professional standing (see e.g. Chun, 1999; Fischer, 1996).

Sex Chatline Workers. Unilateral management setting and monitoring of performance targets, inability to refuse calls, lack of training and advice on handling of customers, poor pay and benefits, and routine of work (see e.g. Flowers, 1998; Jewell Rich and Guidroz, 2000).

Porn Actors and Actresses: HIV/AIDS and sexually transmitted disease (STD) health testing and medical insurance issues, long working hours without overtime payments and low pay rates relative to company profits.

Why have unions become open to organising sex workers?

Until relatively recently, union movements in the seven countries have not sought to organise sex workers. This may have arisen from either an unwillingness to attempt to do so (resultant from ideological opposition to legitimise sex work or to be concerned with the interests of sex workers) or an inability to do so (through unfamiliarity and inexperience), or both. Thereafter, a number of unions in each of these countries have begun to engage in unionising sex workers. Indeed, the importance of the mental unwillingness to organise sex workers far outweighed any opportunity, resource or experience-based inability to do so. The main questions that therefore arise are why unions decided at one point not to unionise sex workers and why some are now unionising sex workers. There are a number of components in answering these questions.

First, sex workers, as a group wider than just prostitutes, have shown a willingness to collectivise in sufficient measure that the raising of the issue of unionisation of sex workers has now taken place within union movements. Concretely, this has meant that the issue of unionising sex workers could not be so easily dismissed by those who often relied on the argument that the workers themselves had to show some willingness to organise themselves in order to receive help from unions to further do so. This helped undercut the reservations about helping to organise workers whose employment relationship was problematic for unions to organise, that being variously of self-employment, independent contractor status and in the informal economy of not paying income tax or national insurance. Second, the influence of the 'radical' feminist discourse in society and among trade unionists began to wane (see e.g. Allan, 1999; Epstein, 2001; 2002, concerning Australia and the USA, respectively) at the same time as the sex work discourse began to gain a foothold. Reflecting these arguments and the changing balance of influence between approaches and perspectives within feminist milieus, those within trade unionism have become less hostile and more open to denoting sex work as 'sex work' and sex workers as 'sex workers'. Given that trade unionists believe in workers' rights and seek to organise as many workers as possible, it became a relatively small step to take to advocate the unionisation of sex workers once they and what they do had been denoted as 'workers' and 'work'. Third, the sex industry has become relatively more respectable and tolerated in recent years. On the one hand, it has, or certain sections of it have, in some countries, become less affected by criminal activity and more perceived as legitimate businesses as a result of changes in regulatory regimes. On the other hand, sexual mores have changed to some degree where sex and sexuality are more prominent and less inhibited within society. Fourth, the decriminalisation and greater legitimacy of sex work by virtue of recent developments in state regulation have removed some of the reasons why unions were unwilling to consider requests for unionisation. Trade unions can conceive of their role as one of representation of sex workers vis-à-vis public authorities and bona fide employers now in a way similar to that of representation of other workers.

The background to these components concerns a number of wider phenomena. Prime among these are the significant decline in union membership in the last 25 years, organisational atrophy in the union heartlands of engineering and manufacturing, weak presence in the private service sector and unions' willingness to attempt to remedy this situation. More specifically, the emergence of 'social movement' and 'community' unionism on the one hand, and of the 'organising' approach on the other, has allowed some unions to attempt to relate to sex workers more easily than was

previously the case. Practically, this has involved working with what approximate to the 'social movements' of sex workers, and working with those who are not employed per se, who are unorganised and whose employment conditions are heavily influenced by extra-workplace and indirect employer forces such as legal or regulatory regimes. Further, some of the most advanced developments have taken place among exotic dancers rather than prostitutes because the former work in greater numbers together and in environs that are more like conventional workplaces that trade unions are accustomed to organising.

BARRIERS TO ORGANISING

While qualitative significance can be attached to the emergence of the first instances of sex worker union organisation, this cannot be done without also locating these instances in the context of their quantitative sparseness. A generous estimate of the numbers of unionised sex workers in the seven countries is 5,000 in total. Therefore, this section examines the forces and processes that serve to act as barriers to the unionisation and organisation of sex workers. The manner in which this is done is not simply to suggest that, on the one hand, there are 'helpful' factors and, on the other hand, 'unhelpful' factors, and putting the two together explains the presence and absence of sex worker union organisation. Rather, there is a complex interaction between the forces towards collectivisation and organisation (unionisation) and the forces towards atomisation and disorganisation (non-unionisation), which is of a different magnitude, balance and complexion for the different subgroups among sex workers as well as within the different countries. One phenomenon in one context may increase propensity to unionise while in another decrease propensity to unionise. Meanwhile, a number of the practices such as individual coping strategies are not incompatible with unionisation per se. More exactly, their import depends on the relative significance attached to them by sex workers. The following discussion is merely subdivided in order to isolate, for analytical purposes, the most salient issues in explaining the existence of generalised barriers to sex worker unionisation. One generalised barrier that is not discussed concerns the impact of current union weakness on attempts to unionise. This is not because this is unimportant but because the issue has been covered elsewhere.

The 'sex work' discourse

The limited presence of the 'sex work' discourse among sex workers (Altman, 2001: 102; Bernstein, 1999: 111; Zatz, 1997: 283) as well as within wider society is decisive in explaining the limited development of sex worker union organisation. The same is true of the opposition to the 'sex work' discourse, particularly among high-profile women public intellectuals (see e.g. Hughes, 2004a; 2004b). This may seem almost too obvious but it is, nonetheless, critical to understanding the foundation of generalised barriers to sex worker unionisation. Knowledge of, if not concurrence with, the 'sex work' discourse is *likely* to be a necessary prerequisite for the *possibility* of unionisation. Awareness and agreement may provide the ideological and attitudinal resources

¹ Limitations on space preclude a consideration of the specific context and manifestation of general barriers to unionisation amongst the particular subgroups of sex workers like exotic dancers, prostitutes and sex chatline workers. For this, see Gall (2006: 187–221).

to help generate a willingness to set up a union, join a union or be active within a union. At most, the sex work discourse helps lessen the individually internalised ways in which sex workers experience stigmatisation and helps increase their degree of self-confidence through legitimation. Without it, low measures of self-esteem and self-belief are likely to exist alongside high measures of self-loathing as many sex workers will view the sex work they do as degrading, unchaste and immoral. Its absence in helping account for low levels of self-esteem is compounded by the relatively poor educational background of most sex workers, leading to a tendency of a lack of awareness of rights and entitlements. It is thus clear that the 'sex work' discourse is not found among a majority of sex workers.

There are a number of other particular consequences of the limited presence of the discourse. The first is that the number of sex worker union activists remains small. Typically, each sex worker union organisation has no more than 10 sex worker union cadre, with the effect that union organising capacity is curtailed and union organisation has a marked fragility to it. The second concerns the importance of divisions within and across sex workers in terms of social and market hierarchy (Bernstein, 1999; Bruckert, 2002). At the bottom of the 'pile' are street prostitutes while in the middle are sex chatline workers and towards the top are high-class 'call girls', wellknown porn models/actors and actresses, and exotic dancers. These classifications by sex workers are based on their values primarily concerning working conditions like safety, length of hours of work and sex worker choice of clients, earnings capacity and social status. The proximity to the sale of sex, defined as physical contact with the client that leads to or is intended to lead to sexual gratification, is a key notion in these values. A closer proximity without what are regarded as considerable rewards is seen as undesirable. Distance from the sale of sex even without considerable rewards is still regarded as being preferable. Within prostitution, again, street prostitutes are at the bottom, with flat-based and brothel prostitutes above them and escorts and 'call girls' at the top. Within other subgroups, status is attached to earning ability, celebrity and popularity. For example, among exotic dancers there are three groups, with 'house dancers' being at the bottom along with the touring 'road girls', while at the top are the 'feature dancers' who are minor stars and personalities within the sector. Alternatively, working in strip and nude dancing clubs can be divided by degrees of desirability, with normal bars and pubs at the bottom along with strip joints and 'gentlemen's clubs' and lap and table dancing clubs at the top. In toto, these internal divisions make the possibility of creating a wider community of sex workers difficult. Finally, awareness, sympathy and some agreement with the discourse are also necessary among other groups and milieus in society, be they unions, policy makers, or 'public opinion', because ignorance of, disagreement with, or hostility to the 'sex work' discourse constitutes another barrier to unionisation. Absence of the discourse among these non-sex worker groups and milieus comprises an obstacle to not just the self-recognition and self-consciousness of being a sex worker but also obstructions to unionisation propensity from those that can or are needed to play a helpful role. The import of this is accentuated in regard of those that might be expected to be supportive, namely socialist and feminist milieus.

Self-employment, proximity to the market and self-exploitation

Most sex workers are not employed; they are self-employed or independent contractors. Many sex workers also deal directly with their customers, negotiating the terms

of exchange. The consequent difficulty for unions here is that the traditional (semi-permanent) bilateral relationship between worker and employer upon which trade unionism conventionally depends does not exist, so there seems no obvious bargaining partner (Chun, 1999; Fischer, 1996). Moreover, the extra dimension of the client can act as a buffer between sex worker and sex 'employer' as well as trifurcating the employment relationship into a more complex interaction. These facets can be expressed as a proximity to the market or a direct presence in the marketplace, where the sex worker is not just the 'producer' but also the 'seller' of services. Although this kind of assessment misconceives the role that trade unionism can play, resultant from a narrow conceptualisation, and ignores the *de facto* employment status and regulation of sex work that creates a bargaining partner, it still has purchase.

The relevance of having a non-employed status and/or directly negotiating the terms of exchange where there is only a bilateral customer/client—sex worker relationship as a disincentive to unionisation is greater for exotic dancers, for some individually working prostitutes and for some pornographic models and actors/actresses. Despite the operation of market rates, establishment rates and some degrees of collective self-regulation, a personal and individualised responsibility exists for first getting custom and then conducting the negotiations for the fee and for the outcome of these negotiations. In the case of sex chatline workers, the parallel is deploying techniques to lengthen call time or get repeat calls from a particular customer. This phenomenon places a great degree of emphasis on the individualisation of the employment exchange. The ramifications of having to deal with many client relationships in this situation, as opposed to a semi-continuous and solely occupying relationship with the same client (as with an employer), adds to this personal responsibility because of the lower level of client dependency on each sex worker. It therefore appears that the individual prostitute or pornographic model or actor/actress is responsible for their own 'fate' here.

Related to this notion of individualised responsibility is the view held by some sex workers that they are not exploited but, in fact, doing the exploitation as well as benefiting from it (see e.g. O'Connell Davidson, 1998). This is more than just believing that the pay is better than what can be gained elsewhere for low-paying, routine and mundane jobs. It is a view that sex workers, primarily women, are taking advantage of the sexual, emotional, and personal inadequacy and inexperience or unfulfilled desires (and associated guilt) of clients, predominantly men, to gain a considerable financial reward, that the work involved is little and of a short duration and that during these transactions, the sex worker is in control, determining the content and manner of the service that has been paid for. Some sex workers argue that once the terms of the transaction are agreed upon, the degree of power that passes to the sex workers vastly increases. Consequently, the view is that the sex worker has power over the client. This perspective can only accept a version of exploitation through the notion of self-exploitation, but even this is intimately bound up with notions of clever exploitation of market opportunities, self-interest and selfaggrandisement.

Labour and 'product' market forces

It may seem rather trite to state that sex workers experience the normal dynamics of the operation of labour and product markets given that the selling of sex and sexual services are being discussed. Nonetheless, this is the case. Expanding labour markets and price competition are the most salient phenomena here.

The entrance of more workers into sex work labour markets has had a number of sources. This includes students wishing to finance themselves through higher education, women migrating from Eastern Europe and Asia in search of a relatively betterpaid work or workers with existing jobs seeking to supplement their inadequate wages by taking on extra de facto employment (Bhattacharyya, 2005; San Francisco Bay Guardian, 8 March 2001). The rationale emerging here is of economic compulsion for many, given that sex work can be relatively well paid for short hours of work. Expansion of the sex work labour market, other than for niche markets like fetishes, has tended to depress relative prices in the last decade. This tendency towards expansion has created further pressures towards competition for employment, competition for opportunities to work where there is no employment in sex work as such, and competition over prices charged and prices set by others. The state of sex work labour markets would thus conventionally be termed 'slack'. By contrast, little evidence exists of 'tight' sex work labour markets so sex workers have seldom been able to attempt to benefit in the way other workers have been able to by taking advantage of the greater demand for, rather than supply of, labour. Within prostitution, there is a particular aspect to the expansion of the labour market. It concerns what is, in effect, the rise of forced labour, namely that of largely trafficked migrants who are compelled by economic strictures (debt), violence and abuse (and threats thereof), and social and physical isolation to work not only long hours but in servile conditions. In the pornography sector (static and moving images), there is an additional force at work. The desire to get started, develop a portfolio and become a star on the part of an abundant supply of models and actors/actresses in order to 'get rich quick' has, no matter how unrealistic, tended to depress the price of labour. This is the case even though the increased demand for pornography has been facilitated by change in social attitudes and new technologies. Moreover, the labour market for men in pornography has now expanded with the arrival of Viagra so that many more men can now perform the required lengths of time with the necessary erections.

The effect of these multifaceted, multilayered processes associated with labour and product markets has been to provide considerable obstacles to creating forms of collectivism and solidarity in terms of consciousness and organisation based on the realisation of common interests, which are necessary for the possibility of trade unionism to exist. Trade unionism is based, inter alia, on trying to reduce the level of competition between workers within a trade or sector while at the same time trying to increase the price of labour by acting in a monopsonistic manner. It has often been reported that street prostitutes will look out for each other in terms of safety and exercise a form of price control (Sanders, 2005). But this must be set against the observation that if work has been slow or prostitutes are in desperate need to feed their drug habit, a downward price competition can emerge and standards of safety can be lowered. With regard to exotic dancing, the emergence of an increasing number of clubs and clubs' policy of deliberately 'hiring' more dancers than are needed for the volume of work available has the effect of creating competition for custom. In street prostitution, new entrants to a pitch are discouraged in different ways if existing prostitutes feel that this constitutes oversupply.

Non-union methods of interest representation

A common disincentive to unionisation is often the prevalence of various non-union methods of interest representation, whether initiated by workers or employers. The

most obvious means is the continuation of the many sex worker advocacy and pressure groups. Their sustained presence is a testament to some degree of utility where sex workers continued to be weakly constituted as an occupational group. In terms of collective non-union third-party workplace representation, 'house mothers', either specifically employed by the clubs or as a result of dancers who informally take on this role, can provide a form of voice, grievance and dispute resolution, and general interest representation. In pornography, women actresses and models tend to be accompanied by partners when working to provide some form of security. These partners also play the role of business agents and managers. For the prostitute, the pimp can play a similar role: interest representation and protection from clients, other prostitutes and pimps albeit at a heavy financial and personal cost. In the USA, dancers have filed class lawsuits against clubs with some successful outcomes.

There are also methods of attempting to exercise collective influence (Gall, 2006: 88–90, 197–200) through petitions, lobbying and boycotts of clubs with poor reputations for working conditions, whereby dancers are urged to avoid certain clubs for their own good and for the good of dancers overall. The thinking behind boycotts is that clubs will either be forced out of business for lack of dancers or be forced to improve their working conditions in order to attract and retain dancers. Sometimes these boycotts are informally organised through word of mouth, sometimes they are more formally organised through websites. A variation of this form of collective action with regard to street prostitution is collective price setting and enforcement as well as websites for prostitutes written by other prostitutes on how to avoid arrest and what to do if arrested. 'Ugly Mugs' schemes whereby sex workers monitor and refuse to service dangerous or difficult clients, based upon the sharing of information and experience (including photographs), are other examples. These examples continue the methods of some of the earlier prostitutes' rights groups.

However, more prevalent than any of these would appear to be the individual coping and distancing mechanisms to deal with the trauma (emotional, psychological, physical) involved in sex work. These range from creating work identities separate from non-work identities, screening of clients, drug and alcohol use, making clients orgasm quickly, taking advantage of the customer (or believing this to have happened) and humour (Brewis and Linstead, 2000c; Flowers, 1998; O'Connell Davidson, 1998; Sanders, 2004; 2005). Another aspect of non-union methods of interest representation is that of individual resistance where the sex workers appear to 'play games' with customers to ridicule, unearth and admonish them (Flowers, 1998; O'Connell Davidson, 1998). Although not incompatible with unionisation strategies per se, these means appear to provide more immediate, relevant and effective ways of dealing with the risks associated with sex work because unionisation has a higher required threshold of collective activity, organisation and consciousness.

Other factors

A plethora of other barriers also exist, represented by the informal economic exchange nature of the sex industry, the socio-psychological instability in the personal lives of sex workers (see e.g. McKeganey and Barnard, 1996), part of the sex work discourse also being an enterprise discourse and some of the sex industry being characterised by 'small business' personalised and informal employee relations. Moreover, some sex industry entrepreneurs are women who have previously been sex workers themselves. Employer hostility has also been marked with strategies of suppression (sackings,

victimisation, violence, favouritism) and substitution ('house mothers', concessions, staff forums) to avoid and crush unionisation while deploying 'surface bargaining' to undermine collective bargaining (see e.g. Machen, 1996). A contradictory aspect of sex work discourse is that significant numbers of sex workers, particularly those at the top of the sex work hierarchy, subscribe to the view that sex work is already a largely satisfying and rewarding labour so that through this lens grievances are unlikely to develop. The sense of hierarchy itself is divisive (see e.g. Bernstein, 1999; Day, 1996). The individualised nature of the labour process and the relative absence of the 'collective labourer' (Marx, 1973) have a relevance in explaining the seeming irrelevance of trade unionism felt by many sex workers. Some sex work is highly individualised where the whole service or act of labour is performed without dependence upon, or interaction with, other sex workers. Other sex work does not involve collective labour but is carried out in proximity to other sex workers. Here, individual sex workers' service delivery and performance are seen to be their own responsibility. Lastly and in regard of prostitution, the outcomes following changes in regulation towards decriminalisation and legalisation in Australia, Germany, the Netherlands and New Zealand—often a major spur to unionisation—have not matched the associated expectations. For example, as prostitutes are now obliged to pay tax and lose anonymity by being registered as prostitutes, many avoid this by moving further 'underground' into the informal economy. Consequently, unionisation has been viewed as either being ineffective in helping to ameliorate these deleterious outcomes, being associated with these outcomes or being unable to take advantage of the new opportunities.

CONCLUSION

Sex worker union organisation is in an embryonic form. It has emerged in spite of huge internal and external obstacles because of a mobilisation by a limited milieu of determined sex worker union activists. It represents an example of deliberate human agency in the context of environmental structure and indicates the complex dialectic between the two. It is worthy of study as a social process regardless of its quantitative extent. Nevertheless, it is a fragile phenomenon, comprising a small and narrow activist and social base with instances of organisations often emerging and then withering where they remain as stand-alone projects. Consequently, sex work union organisations have sought to establish various supportive relationships with existing 'mainstream' unions. Nonetheless, the relationship of union movements in the seven countries to sex worker unionisation contains a fault line. While there has been some recognition among existing unions that they need to organise a hitherto unorganised group of atypical workers, and do so using the relatively innovative means of 'union organising' and social movement approaches, this is a relatively limited development. This suggests that this aspect of the process of general union revitalisation is slow, spatially delimited and internally contested. Within unions, pressures towards representing the interests of existing members, the balance of opinion vis-à-vis the sex work discourse and the paucity of available resources suggest that union revitalisation concerning sex workers will continue at a slow pace for some time to come.

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