

Divided We Stand

Polarisation of the Sex Work Discourse and
Migrants' Access to Health Care in Malta



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Abstract

This thesis explores two facets of the situation in Malta regarding sex work: The contemporary public discourse and the landscape of existing services and their accessibility. Drawing upon ethnographic methods and theoretical frameworks from anthropology, the study analyses the present perspectives in the public debate and delves into the intricate layers of the social and political fabric of Malta and its implications for sex workers, migrants and stakeholders. Stakeholders, in this case, include all individuals and (non)-governmental institutions that have either influence on or interest in the topic at hand. Therefore, research participants comprised advocates, service providers and public officials from field such as policymaking, migration, health care and women's rights. Taking a closer look at the sex work discourse and current landscape of existing services and challenges associated with them provides a compelling example for examining broader prominent phenomena within Malta, such as polarisation, xenophobia and structural shortcomings.

In 2019, public debate was incited through a public consultation process on a policy reform concerning sex work. As a consequence of that, two primary 'camps' emerged in Malta supporting two similar but discursively opposed policy models: Decriminalisation and the Nordic Model (i.e. client criminalisation). The public debate that ensued was experienced as hostile and unconstructive by many involved. Delving into people's personal experience and perception of this discourse as well as the beliefs and Examining varied reasons for engagements in the sex work discourse, I analyse how actor's positionalities, experiences and beliefs are deeply intertwined with the local context of Malta. Implications for the evolvment and nature of the debate are discussed, including the seeming contradiction of actors publicly antagonising each other while closely collaborating on other issues such as abortion.

Extending this exploration, the current structural and social frameworks in Malta constituting the setting of this discourse are explored. Employing an intersectional approach, I evaluate prevalent narratives and systems in regard to migration, constituting important context for their various repercussions on non-citizens lived experiences. Finally, approaching enquiry through the lens of local stakeholders', existing barriers to accessing health care services and knowledge for migrant(s and) sex workers as well as challenges for service providers in providing said services are identified and discussed.

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Introduction and Methodology

Almost a month into fieldwork, I finally completed a well-known Maltese initiation ritual: eating my first *pastizz*. *Pastizzi* are oval shaped pastries of flaky dough with savoury fillings. They are a central part of Maltese culture and scenery, with *pastizzerias* found on most streets on the island selling various savoury snacks for people on the go. Guiding me through this ritual was my friend Nicole. “*You can’t just get your first pastizzi anywhere, we have to get them from the best place*”, she said, bringing the car to a halt in the parking lot in front of the walls of Mdina, a medieval town and former capital of the country. Expecting to go through the gate into the town to find a *pastizzeria* hidden in the winding narrow streets, she stopped me and pointed in the opposite direction towards a small establishment. First, I couldn’t read the name on the front as it was covered by the big umbrellas, shading its customers from the summer heat. As we moved closer, the sign saying *Is-Serkin* became visible along with a clear indicator of a good local eatery: The tables outside were filled with elderly Maltese men. Smoking, drinking coffee and eating *pastizzi*, they exuded a sense of idleness and permanence that could not be swayed by the bustling presence of tourists, just like the old town a few steps away. Walking into the diner, we were hit with the heat from the oven that filled the small room. A piece of paper with simple black text informed you of the available fillings and prices: *Irkotta* (cheese), *pizelli* (peas) and *tigieg* (chicken) for 50c per piece. Nicole went up to the counter and got two each of the ricotta and pea, “*the most traditional ones*”, she said. Walking back to the car, she informed me about a prominent national debate: “*Once you tried both, you have to pick a favourite! There are lots of new flavours nowadays, but everyone has to have a preference when it comes to the original ones.*” At the time, I took it as a light-hearted competition. But over time, I got asked on multiple occasions which one I preferred, and not everyone accepted nonpartisan answers¹. While there is arguably not much at stake in the case of *pastizzi* preference, it was a first introduction to the binarity and polarisation present on Malta. Seeping through the webs of social networks and discourses, from political alignment to food, there is little toleration of grey areas when it comes to positioning yourself on a given topic. Some people might be more or some less passionate about their opinion, but everyone has one. And you must have one, too. How else would one know if you’re on their side or not?

¹ I prefer ricotta.

Among the many topics provoking diverse debate in Malta, sex work is one of them. Located at the cross-section of themes such as gender, sexuality and labour, the range of sentiments and norms associated with it are just as diverse as the people talking about it. Malta is no different. The inherent divisiveness of the debate combined with a culture of polarisation form a fertile breeding ground for what I will explore in this thesis: Analysing the sex work debate in Malta through the lens of stakeholders, I will discuss the localised manifestation of the public discourse and connected phenomena. By public discourse, I refer to the “*linguistic level at which social action and exchange takes place*” (Linde, 1986, p. 184) including all public communication on a particular topic as well as interests and values attached to it in offline and online spaces (Ferree et al., 2002; Witschge, 2008). Situated within a unique geopolitical and historical position, Malta exhibits an interesting hybrid version of the sex work debate that combines discursive aspects prevalent within other European countries with specific local facets and expressions. The debate takes place against a backdrop of dominant Catholicism, personalised politics and increasing migratory flows that make Malta a compelling case for further enquiry.

The question guiding this project was the following: “*What challenges do migrant sex workers face in accessing health care services and knowledge in Malta?*”. The sex industry typically goes hand in hand with migratory phenomena and non-citizens making up a significant part of it (TAMPEP, 2009). The decision to adopt the focus on the migrant population emerged from the fact that most data on the situation in Malta predominantly centres around Maltese sex workers² (although the number of existing studies is quite limited) as well as the presence of a hostile border regime and policymaking grounded in xenophobia (Van Hooren, 2015). Furthermore, stemming from previous voluntary and activist engagement within the fields of feminism and migration, I developed a particular interest in the cross-section of gender, health and migration that is reflected in the theme of this thesis. Investigating structural and systemic issues limiting opportunities and wellbeing of specific groups of people in an attempt to support and facilitate impactful positive change is an undertaking close to my heart. Choosing stakeholders as the main interlocutors presented itself as a productive way to achieve this aim. Although not as common in traditional ethnographic research, the inclusion and focus on stakeholders is a central element of Applied Anthropology, i.e. anthropology “*put to use*” to solve practical, “real-world” problems (Van Willigen, 1984, p. 277). This research is thus

² See OAR@UM (2023) for examples.

situated in academic, feminist and activist debates on gender, sexuality and migration as well as the applied practice of anthropology in the public and health care sector.

I will begin with a brief insight into Malta, followed by a methodology section outlining the various research techniques employed as well as a discussion of ethical considerations. Chapter 1 delves into the sex work discourse, covering central elements such as terminology and policy models before providing some context of the discourse in Malta. Chapter 2 explores the dominant perspectives on sex work in Malta, Decriminalisation and Client Criminalisation and the Nordic Model, examining the varied reasons for people's engagement within the debate and their effects on it. In Chapter 3, the focus shifts to the topic of migration, addressing the intersectional approach, the socio-political context in Malta and outlining the local sex industry. Chapter 4 investigates a selection of challenges in accessing and providing healthcare services in Malta for migrant sex workers and stakeholders that emerged as a result of the study. Finally, in the conclusion I will summarise key findings and insights from the preceding chapters and suggest potential topics for further enquiry.

Before I dive further into the research process itself, it is useful to set the scene.

Malta: A Brief Overview

Malta is an small island state in the middle of the Mediterranean, located in-between Italy, Tunisia and Libya. It is made up of the main island, Malta, and the smaller island Gozo. 520.000 people live on 316km², making it not only one of the smallest but also most densely populated countries of Europe (National Statistics Office Malta, 2023). Catholicism structures society and the everyday life of the Maltese people to this day, a fact emphasised by the approximated 360 active churches that can be found all over the island.

Due to its geographical location, Malta has been a hub and transit point in the Mediterranean for centuries. Ruled by a range of different peoples and empires³, the most important and prominent to contemporary Maltese identity are the Order of Saint John and the colonisation by the United Kingdom. Both are and have been utilised in the past but especiallyly in the last decades by some Maltese politicians and groups of people to achieve the following: Being viewed as a legitimate part of Europe. The legacy of the Order dominates touristic attractions

³ The Romans, the Byzantine Empire, the Arabs, the Normans and the French, to name a few.

and common knowledge about Maltese history in an attempt to create a continuous historical connection to mainland Europe (Mitchell, 2012). Occupation by the English Empire lasted for almost 150 years including acts of (cultural) oppression that are still present in the collective memory of older generations (Mercieca, 2012). In the decades after gaining independence in 1964 and especially in the early years prior to joining the EU in 2004, distancing their national identity from those previous perceptions as Other and ‘less than’ became a central concern. Although a point of contention at the time with some fearing the EU’s influence on Maltese traditions and sovereignty, nowadays Malta has increasingly embraced its European identity (Mitchell, 2012). However, this internal battle between traditional values and modern national identity persists, as demonstrated by Malta’s progressive policy-making in terms of LGBTQ+ rights starkly contrasting its conservative and condemning stance on abortion, for example. Although younger generations increasingly identify with more inclusive and progressive perspectives, the church still has a strong influence on Maltese society and politics. With over 96% of Maltese nationals identifying as Roman Catholic (National Statistics Office Malta, 2023), religion permeates all facets of life in Malta, from local communities to education. Additionally, the trend of heightened immigration over the last few decades and specifically since joining the EU has changed the demographics and economy of Malta significantly (ibid.).

The social structure of Malta is further shaped by another central factor: size. Smaller than Oslo (454km²) and 95 times more densely populated than Norway (UN, 2022) coupled with its insular geographical character results in tighter-knit communities and public life. Baldacchino and Wivel (2020) identify informality and intense personalisation as two aspects characteristic of small states. This intensity, or in other words “density”, of social relations is often expressed as a way of “everyone knows everyone”. However, this statement is not necessarily based on actual connections but on the perception of their potential existence which in turn affects people’s social behaviour (Boissevain, 1974): There is a constant sense of a lack of anonymity. Wherever you go, you might be seen by someone who knows (about) you or a common acquaintance. Societies with increased density and flows of information often also exhibit a high degree of consensus regarding prevalent norms and consequently social control (Boissevain, 1974), i.e. stepping outside of these norms can have direct and sometimes harmful effects on an individual’s life. One example from Malta demonstrating people’s awareness and concern about this was a National Youth Parliament debate about abortion taking place in September 2022: Intended as a non-public event, pro-life activist Simon DeBono shared the list of names of those on the pro-choice side on his social media. Subsequently, 16 of the original

27 students on the pro-choice side dropped out of the debate in fear of negative repercussions in their private and professional life (Farrugia, 2022). Being aware of and upholding one's public image thus becomes a crucial task to navigate in everyday life because, as a Maltese friend once aptly put it: "*Rumours can become reality if enough people believe them*".

This direct impact of social relationships and intense personalisation also extends to political life, whereby personal connections (can) turn into structural ones (Mitchell, 2012). Small states exhibit a seeming dichotomy: Political figures tend to be closer and seem more approachable to the general population on one hand, while simultaneously belonging to a group of elites lobbying for their own interests on the other (Baldacchino & Wivel, 2020). The personalised character of national politics is thus situated within a network of obligations and sometimes contradictory interests. Showcasing remnants of clientelism, a lingering sentiment of having to form a connection with certain people in order to gain access to certain resources is still present today (Mitchell, 2012). This phenomenon combined with insufficient checks and balances by national stakeholders result in a fertile breeding ground for corruption (Mercieca, 2012), most recently showcased by a multi-million Euro disability benefit fraud enacted by Silvio Grixti, a former member of parliament (Zammit & Borg, 2023). Furthermore, emerging from these historical and contemporary conditions alike, polarisation is omnipresent in Malta. A de facto two-party system stemming from a divisive search for a new national identity after decades of colonialism as well as a prevailing lack of pluralism of options and ideas due to limited capabilities are just two of many factors promoting polarisation (Baldacchino & Wivel, 2020; Veenendaal, 2019). Additionally to the presence of groups of people aligning with differing perspectives, there is a strong sense of opposition between them that is often informed by emotions and overarching interests. Boissevain (1964) identified this prevalence of factions and hostility as characteristic aspects of Maltese (political) culture. The mindset of "us against them" and the existence of parallel realities is hence intrinsic to public discourse and life (Mercieca, 2012).

Departing from the seemingly harmless example of *pastizzi* preference, I have discussed some of the facets that have shaped and continue to shape Maltese life and discourse at large. A historically informed battle for independence and national identity, socio-demographic changes since joining the EU as well as a social structure characterised by density, social control and personalised politics were explored as elements standing in correlation with prevalent polarisation and hostility. Constituting the background of the specific debate at the centre of

this paper, giving a short overview of relevant phenomena in the locality of Malta further contextualises the following discussion. Before commencing exploration of the local sex work discourse and its ramifications, I will first lay out methodological and ethical strategies applied during this project.

Methodology

Once I arrived in Malta, most of my days were predominantly occupied with doing desk research about the situation in Malta through reading studies, academic papers and media articles. Later on, research about and correspondence with (potential) interlocutors would also be part of the daily tasks at hand. Apart from this, preparing and conducting interviews, writing fieldnotes and volunteering at Dar Hosea were main activities. In the following paragraphs, I will lay out the methodological approach and interventions applied during this project in more detail.

Stakeholder Mapping

Arriving in Malta in mid-June, right in time for the beginning of summer, has many advantages. After all, there are worse places to spend these months of sunshine and warmth than on an island in the Mediterranean. Yet, there are also a few drawbacks. Summer is the time of leisure and relaxation, everything is running at a slower pace. In Malta to an extent forcibly so due to the excessive heat and humidity. School is on break, many people go on holiday, and offices are on lower capacity. These were the thoughts I had the first five weeks of my time in Malta, trying to come up with an explanation for why no one I reached out to answered until well into July. What the actual reasons were I will likely never know. Fortunately, the second half of summer would turn out to be when I conducted most of my interviews.

To start out with, I started to create a visual mapping of relevant stakeholders in Malta. As stated previously, I strived to employ an approach inspired by Applied Anthropology to this project. I say inspired, as Applied Anthropology typically conducts research not only with but *for* a specific stakeholder or “*client*” (Ladner, 2014). Although I am planning on sharing relevant insights and results with participants and other interested parties in the form of a report, I did not directly involve them in the development of this study. Nevertheless, the goal of broadening anthropology’s impact to other fields and non-academic communities to combat “*disciplinary division*” guided this project (Strathern, 2006, p. 202). Although, as Pink and Fors (2017) argue, anthropology has never been fully disconnected from the anticipation of its reception, the

intended audiences and deduction of actionable outcomes are characteristic to more applied approaches. Similarly, I aim to go beyond describing and analysing by converting insights into solution-oriented problem definitions and suggestions for potential solutions to support the work that stakeholders are already doing in a more direct and accessible way. Keeping the definition of “stakeholder” rather broad, in line with Walker et al. (2008), I included individuals and institutions that *had a stake or interest in the topic as well as those that could contribute to it*. In the case of this project, identified interlocutors thus primarily included public officials, such as police officers, political representatives and those employed in public institutions, as well as social workers, advocates and representatives from non-governmental organisations.

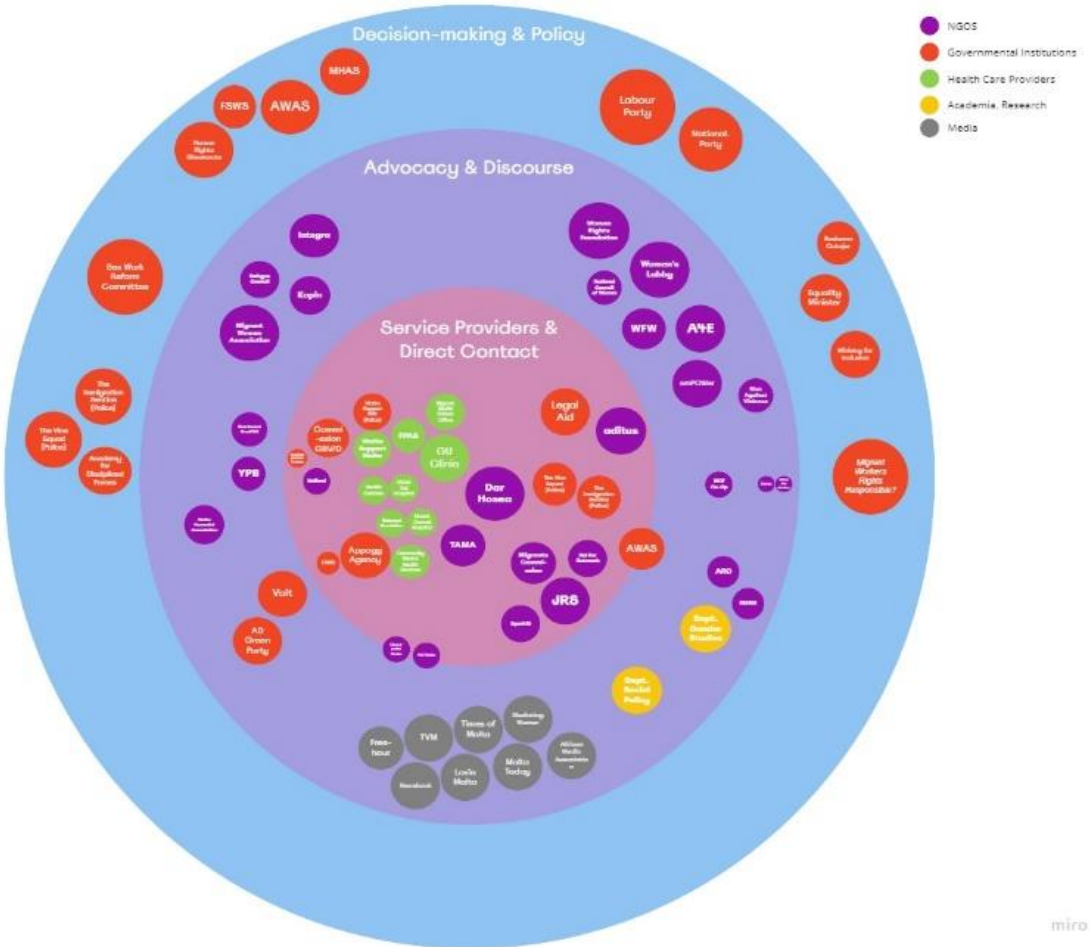


Figure 1: Stakeholder Map

In Malta, there is an exceptionally high number of non-governmental organisations and governmental bodies in relation to the size of the island state. Thus, the mapping helped with gaining a better overview of the landscapes of existing entities. Categorising them by assumed impact (or proximity) to the group of people in the centre of enquiry – namely sex workers,

migrants, and/or women – the graph below was created. Thus, the centre included service providers who work directly with these groups of people, followed by those engaged in advocacy about causes directly linked to them on the next level, and decision and policy-makers on the outer layer, as they constitute the general framework and (legal) context that all other actors operate within. Additionally, stakeholders are colour-coded by sector and grouped spatially by activity field or topic within the different layers (e.g. university, police force, migration, women's rights). Following the logic of a power/interest matrix (Newcombe, 2003), stakeholders with a higher influence and/or interest in the issue are depicted as bigger than those with less. The map was expanded and updated throughout the fieldwork period and has served me well in determining who to approach.

Interviews

Once an individual or institution that would be interesting to talk to had been identified, I reached out to them either directly by contacting them through a publicly available email address or through an internal gatekeeper (such as the Communications Department within the Police Force). Later on, referrals would also happen through previous interlocutors in the form of snowball sampling (Parker et al., 2019). In the initial email, I included information about me and the research to enquire about their general interest to take part, followed by another email with the information letter and consent form once they expressed such. Scheduling was also done solely through email. For more flexibility on the interlocutor's part, the option to meet online was always given. Many decided to make use of this as it is much less of a time commitment with the omnipresence of intense traffic on the island (sometimes crossing a distance of 10km by car could take up to one hour, if not more). An interview guide was created for each meeting. Where possible, an abbreviated version of the interview guide (for example omitting follow-up questions or personal notes for context) was sent to the interviewee beforehand. Before the start of the interview, the interviewee was given another summary of the project and context verbally as well as the opportunity to ask questions or for clarifications. Interlocutors were informed that they could decide to stop the interview at any time or not answer a question without providing a reason. Interviewees were also asked once again if they would like to be identifiable in the final output, and if not, how they would prefer to be referred to.

The main body of the collected data consists of 26 qualitative, semi-structured interviews with local stakeholders from fields such as migration, policymaking, advocacy and health care. One

of the primary advantages of this form of interview is its simultaneous structured and flexible character that allows one to explore topics and ideas that emerge during the conversation, deepening understanding guided by interlocutor's train of thought (Adeoye-Olatunde & Olenik, 2021). Being rather new to the topic in the local and academic context, choosing a more restricted style would have run the risk of omitting crucial themes, while utilising a more open one could have resulted in unfocused conversations with vastly different contents. Alluding to Spradley's (1979) three types of ethnographic questions, the interview guide included descriptive questions ("*Can you tell me a bit about your work at [institution]?*"), structural questions ("*How do you define sex work?*"), and contrast questions ("*Who of these people, if any, would you consider a sex worker and why (not)?*"). It contained a set of questions that were asked to all interlocutors, with additional ones being added and adapted to their specific field of work, expertise, background, and positionality. The standard questions were formulated as open questions to encourage more extensive answers that focused on their subjective views and experiences (Dearnley, 2005). They had two main objectives: First, to allow for some form of more structured comparison of certain views and existing narratives. And second, to critically question the underlying assumption that those within the sex work debate share a collective understanding of concepts fundamental to the discourse.

Visual Elicitation

The inclusion of visual artefacts as tools in qualitative research has been demonstrated to deepen the insights given by "*going beyond the verbal mode of thinking*" (Orr et al., 2020, p. 204). They can act as stimuli encouraging interlocutors to disclose further information or experiences of a given topic, thereby likely further revealing their subjective perspective and positionality towards it (Pauwels, 2019). The idea to include visual elicitation was conceived quite early on, looking for a way to disrupt the potentially rehearsed quality of interlocutor's statements. As I was attempting to explore their understanding of fundamental aspects of the debate, it was running the risk of them replying with the same phrases they had used many times before. Therefore, utilising visual elicitation offered a solution to stray away from these automatic responses, prompting them to pause for a moment and assess their perception and thoughts of the image in front of them. As suggested by Orr et al. (2020), I included it in the standard interview guide. When the image was shown to them, interviewees received a short explanation: I described who the image was created by and that there are no right or wrong answers, followed by the prompt "*What are some initial thoughts you have?*" and a few other questions revolving

around their interpretations of the image.

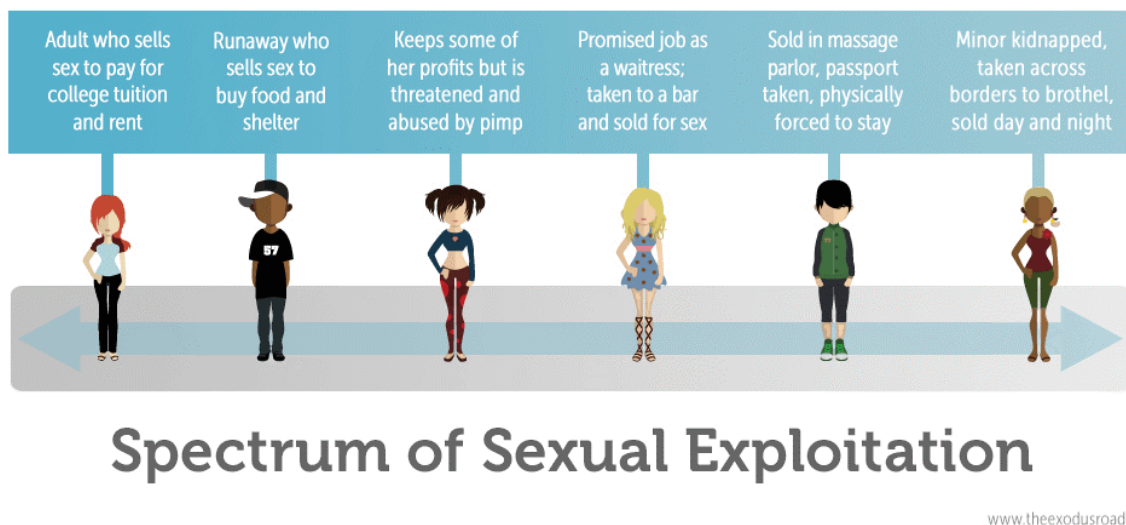


Figure 2: The Exodus Road (2021) Spectrum of Sexual Exploitation

The used graph was created by the US-based anti-trafficking organisation The Exodus Road and is titled “*Spectrum of Sexual Exploitation*”. It was chosen as it was found to have “*projective potential*”, meaning it is relating to the topic while remaining open-ended (Pauwels, 2019, p. 4). Pictured are different personas demonstrating a series of cases. Their circumstances and visual appearances are based on real lived experiences, yet they are meant to be viewed as exemplary, not determinative or generalising. Situations range from “*Adult who sells sex to pay for college tuition and rent*” to “*Minor kidnapped, taken across borders to brothel, sold day and night*”. The interview guide also included the question “*Who of these people, if any, would the Nordic Model/Decriminalisation help?*”. While the graph can be criticised in certain ways, such as regarding the implied simplified ranking of experiences and potential suffering, it has served well for the intended purpose. The decision to include it was made with the goal to utilise the graph as a tool. A tool to steer the conversation away from a more binary narration of empowered and privileged people versus trafficked and exploited people in the sex industry. Instead, moving towards talking about a more nuanced and contextualised understanding of the situation. Moreover, the graph was utilised as a means to gain more insight into the definitions interlocutors had of concepts like who could be considered a sex worker or (potential) victim of human trafficking, and what factors they highlighted (or neglected) in their categorisation.

Changes in policy can often seem like the most significant and effective way to change the conditions that affect the wellbeing and safety of a particular group of people. However, for

those changes to become effective on the ground and on the most individual level, they need to be enforced properly and consistently. It could be argued that awareness concerning the structural framework of the state by those who are directly affected by it is also an important factor. For example, even if policy concerning sex work changed in Malta, knowledge about these developments could take quite some time to arrive in certain subgroups of society and potentially not reach some of them at all. Additionally, an intersectional lens is important when it comes to policymaking. Especially when it comes to topics like sex work, there is a vast range of experiences and circumstances that are to some extent determined and influenced by the individual's identity. Gender, ethnicity, sexuality, nationality, age, mental and physical health, religion, class, and education are just a few of the factors that can affect a person's condition and opportunities in a given situation. As previously mentioned, the graph intends to demonstrate these variations of possible realities and their ramifications. Interlocutors are prompted to reflect upon their stance on policy – one, if not the primary mark of distinction between the perceived groups. Thereby exploring facets of the policy models, such as their strengths and weaknesses, target groups, and effectiveness on the individual level.

Participant Observation

As mentioned above, the majority of data gathering was done through interviews. Participant observation was challenging due to several factors. First, the nature of sensitive topics such as sex work necessitates ample time to gain access and trust. In countries like Malta, where sex work is either legally or essentially illegal and stigmatised, most of it happens underground. Meaning in spaces that are not easily identifiable and accessible (or only for certain groups of people), and that are not (properly) regulated or monitored. As in many other countries, sex work has moved almost completely indoors throughout the Covid pandemic. Areas that were well-known for street work for decades are virtually empty now. Even though the online sector has also grown significantly, it brings other challenges regarding ethics and access with it.

Second, the spaces that are known to exist are not necessarily safe for an individual, young, female researcher. The movement indoors is assumed to take the form of two main categories of locations: Private accommodation, such as apartments or rooms inhabited or rented by either the sex worker or client and covert brothels, such as massage parlours or so-called gentlemen's clubs. Although the running of a brothel is against the law, it is common knowledge what these places are in actuality. Both my supervisors discouraged me from attempting to do research or outreach activities there. The illegality and lack of regulation of these spaces combined with

the strictly male clientele and some cases of known trafficking and exploitation make them a difficult and potentially unsafe place for me to try and gain access to.

Following these constraints, I identified attending public events as one strategy for conducting participant observation as well as identifying and/or reaching out to potential stakeholders. Malta is in many ways a face-to-face society. It's about knowing people and being known. Thus, introducing yourself to someone in person and providing a face to the research project instead of sending multiple emails that might get lost in their inbox seemed like a more productive approach. Some events I attended with that intention in mind, including a talk about the results of a research project by aditus foundation and Jesuit Refugee Service (JRS) Malta. Others, I attended primarily out of personal interest with identifying potential interlocutors as a secondary goal. The latter largely comprised activist gatherings, such as Refugee Week events, a pro-choice rally or a poetry evening revolving around the lived experiences of migration.

Ultimately, the majority of participant observation took place at Dar Hosea, the only organisation working with individuals engaged in the sex industry in Malta. For several months I volunteered with them, spending a few hours there per week. Dar Hosea operates a drop-in centre for service users to rest, socialise, have a meal and get support from social workers. While the engagement with them was valuable in many ways, I will not directly include my experience there in this thesis. Even though I was transparent about my reason for being in Malta and at the organisation, the nature of their operations did not allow for ensuring that everyone present was sufficiently informed about it. It therefore would have taken on the character of covert observation which most definitely is not aligned with ethical practice as well as potentially threatens the privacy and safety of the people in question (Kawulich, 2005). I will go more into detail about this and other specific ethical considerations in the respective section.

Ultimately, I engaged in what Madden (2010, p. 80) calls "*step-in-step-out ethnography*": Although I did not physically leave the field (Malta) for most of the fieldwork period, I was not in regular contact with my interlocutors. Most of the stakeholders I only talked to once during the interview, even though some of them attended the workshops and one of them agreed to a second conversation in the following year. In a sense, ethnographic activity thus predominantly took place in and was temporally limited to the interview context. Despite this, I was always in "fieldwork mode". Malta had turned into an "*interrogative space*" that evoked an ethnographic "*state of being*", meaning that I was continually noticing, talking about, and exploring the topic

of enquiry and its contextual setting (Madden, 2010, p. 81). Be it in conversations with friends, on the phone with family, in the grocery store, on the bus or at a feast. Participant observation does not have to be restricted to a specific place or community, rather it is a way of existing and taking part in daily life in a different way. What differentiates a participant observer from an ordinary participant, is – as the name already suggests – the act of observing and engaging in “*explicit awareness*” (Spradley, 1980, p. 55). We pay attention to the things that most people take for granted or perceive as trivial in order to gain a deeper understanding of the given field. Additionally, not being in “researcher mode” all the time is not only a result of the fact that we are human, but it also is an important aspect of engaging with the field and fostering connections through showing up as ourselves, with all the subjectivity, emotions and flaws that come with it.

Stakeholder Workshops

Throughout fieldwork, I was able to speak to people who positioned themselves on opposing sides of the debate. Two aspects materialised as central preliminary results quite early on: Firstly, most of the people I talked to agree on the vast majority of points. These included the non-criminalisation and safeguarding of sex workers themselves, and how the current system is insufficiently structured and equipped to enable this undertaking. Conversations also unveiled numerous shared challenges and apparent agreement on pressing issues, such as a lack of data, difficulty in conducting outreach initiatives or improving access to services⁴. Secondly, while there has been ample discourse about the subject, there also seems to be an immense lack of genuine constructive dialogue between different parties and stakeholders. The Covid pandemic can be partly blamed for this, as the opportunity for in-person meetings was suddenly strictly limited. From spring 2020 onward, most of the debate about the topic of sex work in Malta took place online. A handful of virtual webinars were held, but much of the conversation switched to taking place more indirectly. Individuals and organisations engaged in advocacy within this debate published social media posts on their own channels or articles in (online) newspapers, often directly criticising those on “the other side”. They would then sometimes publish their own posts or articles as a reaction or to defend themselves or their stance, and so on. However, even before and after the pandemic, the nature of the discourse did not foster effective dialogue. Meetings and events about the topic were frequently structured as discussions between the

⁴ I will talk in more detail about this in Chapter 4.

Nordic Model and Decriminalisation (or ended up becoming such). The goal of sharing insights and collaborating with the aim to produce actionable steps to improve the situation for sex workers was pushed into the background. More often, it was about trying to convince attendees and “the other side” about one’s arguments and position as being the right one. This has been experienced and described as hostile and frustratingly unfruitful by many people I talked to.

Consequently, the idea to create a space for a more constructive dialogue originated quite early on. The aim of creating an opportunity for stakeholders engaged within the field of sex work to come together for an open and respectful dialogue was to foster working collectively on possible solutions and synergies through the sharing of knowledge and resources. To ensure that the conversation would allow for this and not drift off into discussing fundamental disagreements, participants agreed upon certain ground rules beforehand. These included the acceptance of all terminology (as long as it is said with good intentions) and an active shift away from policy to focusing on more actionable objectives. Although the timeframe was somewhat limited, I was able to conduct the first workshop on October 27th 2022⁵. Attendees included a representative from the Victim Support Unit, the Sex Work Program of Agenzija Appogg, and the migrant health NGO TAMA. The conversation ended up revolving around language barriers within service provision, and one possible actionable solution (the creation of a list of known interpreters) was identified. The meeting was viewed as insightful and fruitful and fostered familiarity and relationship-building between the stakeholders. Following the positive feedback, the plan to organise another one of these workshops was initiated not long after leaving Malta. I applied to the Ryoichi Sasakawa Young Leaders Fellowship Fund (SYLFF) to receive funding for this purpose and was grateful to receive the grant. Initially, the intention was to schedule it for spring. However, by that time I had applied to a summer school that would be held in Gozo, the smaller of the two islands that make up the nation. It would take place in July over a span of three weeks. Therefore, it seemed like the more financially and organisationally sound decision to move the workshop to July as well. The second workshop thus took place on July 13th 2023 with attendees including representatives from Willingness, a private sexual health clinic, aditus foundation, a human rights organisation, Alliance for Equality, a prominent women’s organisation supporting the Nordic Model, Aaron Giardina, a recent graduate who had done research with sex workers, and Maria Pisani, my co-supervisor,

⁵ Summaries of all workshops can be found here: <https://sites.google.com/view/srhmalta2022/stakeholder-workshop>

founder of the NGO Integra and one of the main proponents of Decriminalisation. In contrast to the first workshop where all participants were directly involved in service provision, this time most of them were primarily engaged in advocacy. The conversation moved towards the topic of the (non)existence of sex worker communities in Malta. Supporting known and existing informal communities was identified as an actionable strategy, for example through changing the public discourse and making information more accessible. Once again, the feedback had been quite positive and indicated motivation for more of these meetings. Therefore, more workshops might take place in the future.

Data Analysis

Once I returned from fieldwork, I decided to spend a few days focusing on creating a preliminary analysis or “*inventory*” of collected data, writing down themes, thoughts, and possible connections that had emerged throughout fieldwork (Spradley, 1979, p. 191). The idea was not for the further analysis to be determined by it, but to combat the effects of time passing and literature review on the memories and impressions that were still fresh at this point. Nevertheless, subjective and interpretative descriptions based on the embodied experience of fieldwork can be a valuable tool for sense-making later on in the process (D’Andrade, 1976). A deeper engagement with theoretical concepts can at the same time expand and limit our understanding of the phenomenon at hand, as it is easy to fall into the trap of wanting to make it perfectly fit together even if a more nuanced perception would suggest otherwise.

Following this, the more structured analysis commenced, primarily constituted of a process of inductive and deductive coding. Coding is a crucial step in qualitative analysis, allowing the researcher to immerse themselves into the material and identify topics, patterns and contradictions (Adeoye-Olatunde & Olenik, 2021). Going through interview notes and recordings as well as fieldnotes, certain themes had already become apparent as important categories, such as the use of terminology in the demarcation of positionality in the debate, while others emerged during the exploration of data material. Opler (1945, p. 198) defines cultural themes as “*a postulate or position, declared or implied, and usually controlling behavior or stimulating activity, which is tacitly approved or openly promoted in a society*”. Although I do not make the claim that all of these themes are omnipresent in all of Maltese society, they are part of the “culture” of the community of people engaging with the sex work debate. The analysis was predominantly informed by the conceptualisations of interlocutors themselves, thus aiming to explore the “*psychological reality*” of their world, as well as

common themes such as social conflict, cultural contradictions, informal techniques of social control and acquiring and maintaining status (Spradley, 1979, p. 175,200). Passages were annotated according to codes with the help of the analytical tool Dedoose and a strategy of Memoing was simultaneously applied, i.e. writing down thoughts and observations of themes and how they might connect (Corbin & Strauss, 2008). In the subsequent process, Critical Discourse Analysis guided the sense-making and interpretation of themes, their interplay and situated meaning(s). Discourse is “*socially constitutive as well as socially conditioned*”, thereby being produced by social structures and paradigms and shaping them at the same time (Blommaert & Bulcaen, 2000, p. 448). The sex work debate is a field where language carries a lot of weight and can have practical implications for those as the subject at the centre of discussion. In Malta the “*appropriation of discursive practices of ordinary life in public domains*” plays a central role due to its societal structure and organisation (Fairclough & Mauranen, 1998, p. 91). This intersection of topic and locality thus brings forth a specific example that can be utilised to analyse the phenomenon of polarisation in Maltese discourse in general, exploring how people engage in debate and construct their social selves in the process (Blommaert & Bulcaen, 2000).

Ethical Considerations

A core part of doing any kind of research that includes people, but ethnographic research in particular, is ethics. As anthropologists, our curiosity revolves around the acts of sense-making that certain groups of people exhibit, as well as the phenomena and behaviours that are (re)produced through them. Enquiry into these themes often entails building trust and close relationships with the people we want to learn more about through taking part in their life, and attempting to see and understand things from their point of view. In the case of my project, I was aware from the very beginning that it was situated on the highly delicate cross-section of multiple discourses that are commonly emotionally charged and potentially quite personal: Sex work, a subject matter that evokes divisiveness not only within a given society, but also among communities that are usually characterised by their solidarity and connectedness, such as the feminist community. Migration, a phenomenon that, while as old as humanity itself, has led to acts of discrimination, hostility, and violence as well as the question about the extension of empathy that has been omnipresent in this last decade. And health, a theme that every individual on this planet can relate to in their own way, and which usually goes hand in hand with worries that confront us with our mortality and vulnerability as human beings.

In this chapter, I will discuss the ethical considerations in regard to my project and how I mediated related challenges. While they go hand in hand, dividing the measures that were taken into two distinct phases or forms seems to serve this discussion best. First, the procedures that were followed to ensure academic good practice and accordance with formal ethical guidelines will be explained. Then, the efforts that were made within the field considering interlocutors' needs and boundaries will be specified.

Procedural Ethics

In February, a few months before embarking on my journey to Malta, the first step concerning ethics was to submit a notification form the Norwegian Centre for Research Data (NSD). This form included information about the research project, such as intended timeline, sample descriptions, necessary documentation and security measures regarding data collection. The main purpose of the NSD is to support researchers to carry out their projects in line with data protection legislation. My submission was approved in March 2022, meaning I could start collecting data at that point. However, the originally intended project slightly changed towards the beginning of fieldwork. I decided to focus on migrant sex workers instead of women in refugee camps, as the latter is not as present and therefore less relevant in the Maltese context. Therefore, I made changes to the form and re-submitted it in accordance with NSD guidelines.

Dr. Maria Pisani kindly agreed to be my co-supervisor and I was able to conduct the research as part of a traineeship at the University of Malta (UM). This necessitated additional approval by their internal University Research Ethics Committee (UREC). As I was placed within the Faculty of Social Wellbeing, it was their committee (SWB FREC) that had to approve the project. So, once I arrived in Malta in June 2022, I finalised the submission in collaboration with Maria who is sitting on the SWB FREC board and, while naturally not allowed to be part of the decision-making process regarding my project, was able to give me important feedback and tips. One of them was to submit two individual applications, one including only stakeholders as a sample and the second one as an addition to include sex workers too. This turned out to be extremely valuable advice as the first one was approved only a few weeks later, while I received an answer about the latter asking for more documentation in October (shortly before leaving the field). Two consequences derived from this outcome: Firstly, I would only be allowed to interview stakeholders. However, due to difficulties that were faced in approaching sex workers (and migrant sex workers in particular) as potential interlocutors, this limitation did turn out to be not much more than a formal constraint. Secondly, I would not be

allowed to approach any of the service users of the organisation I was volunteering with for formal interviews. Similarly, this would be limiting only in theory, as I had decided soon after commencing my volunteering activities to not do so. The reasoning behind this will be expanded upon below.

Adhering to the regulations and best practices from the ethical guidelines of NSD and SWB FREC, stakeholders would primarily be approached via their publicly available email addresses from the institution they are affiliated with. In some circumstances, contact was initially made in person at public events they were attending in their professional role or through a mutual contact forwarding information about my research to them (i.e. snowball sampling). Before agreeing to an interview, interlocutors received the information letter and consent form, and were given the opportunity to ask questions or voice any concerns they might have about partaking in it. In the consent form, interlocutors were able to select whether they would like themselves and their affiliated institution to be identifiable in the final product. I was recommended by Maria to state this due to the particularity of the Maltese context where complete anonymity could not be guaranteed. On the occasion that someone did not want themselves and/or their institution to be named, the decision for how they would like to be referred to in the final paper was made by the interlocutor. A few of them requested to preview and approve the paper before publication. Those who did have received the finished draft of the thesis and have been given sufficient time to review it.

Relational Ethics

Positionality and the Benefits of Being an Outsider

One advantage that I soon identified once in the field was my positionality as an outsider. Because of the nature of the public discourse in Malta, everyone is expected to have a clear opinion and be on either one or the other side. I actively tried to not engage with this dynamic and would, whenever I was asked about my stance, clarify that I was still gathering information and was interested in their perspective. Most students and researchers working on the topic of sex work in Malta that I met do so out of an activist approach (usually in support of full decriminalisation) and shared that their interview requests were often declined by those on “the other side”. This has not been the case for me, fortunately, as representatives from both camps have been open to talking to me about this topic. Several of them mentioned that they thought I might be the first non-Maltese person to conduct research on this, which seemed to give me some level of increased legitimacy in their eyes. Not being closely familiar with the local

character of public and political discourse turned out to be beneficial too. The conversation could not just go through the motions, so to speak, of how they would commonly play out, as interlocutors sometimes had to stop and explain certain aspects and happenings to me, thereby being required to reflect upon them themselves.

Reciprocity and Transparency

The plan to approach an organization to work with had been present since the initial stages of the project. The aim was twofold: First, taking part in existing activities and initiatives of a stakeholder working directly with the groups at the centre of enquiry would facilitate gaining access to spaces they already inhabit. Sex workers in Malta in particular do not seem to have networks that extend outside their direct environment (place of work or closest social circle), and there are no (known) local community spaces for them, neither online nor offline. Therefore, access to these groups as a researcher is very challenging. Becoming part of a (more or less) institutionalised structure that some of these community members make use of hence constitutes an important possibility to approach potential research participants and learn more about their lived experiences. Additionally, ongoing engagement enables one to build trust over time through continued presence and fostering familiarity.

Second, part of the aim of working with an organisation was giving back. Research and anthropology can often feel one-sided or even exploitative. Interpersonal relationships and exchanges are difficult to quantify, and although it is thus not viable to always expect to find ways to reciprocate in an equal manner, it is essential to be mindful of potential imbalances of power and privileges. Therefore, being aware and mindful of what reciprocity means to oneself and one's interlocutors as well as what forms it could take in a given context can be of great significance and should be a core part of ethnographic enquiry. In the case of my project, supporting an organisation that works with sex workers and/or migrants was one possibility I identified that would enable me to contribute to the field. I would soon find out that there is only one organisation in the country explicitly engaging with sex workers – Dar Hosea. If the “*dar*” (Maltese for “*house*”) as a common part of the names of such institutions did not already give it away, a quick Google search for the meaning of its name would reveal the organisation's affiliation with the church: “*Hosea*” means “*salvation*” and relates to a prophet in the 8th century with this name. After a productive and insightful conversation with Maria Borg Pellicano, social worker and coordinator at Dar Hosea, I commenced volunteering with them in August 2022.

My role primarily revolved around socialising, spending time with and organising outings for service users at the drop-in centre.

The resolution to not conduct interviews with the people making use of Dar Hosea's services was primarily based on two concerns: Confidentiality and transparency. Keeping and respecting the women's⁶ privacy and anonymity was a clear priority from the beginning. Due to sex work being a highly stigmatised subject in Malta, people want as few others as necessary to know about their engagement with it. Even if their names were changed, other details about their characteristics or stories could still make them identifiable to certain people and expose them to potentially serious negative consequences for their personal lives. While it is unlikely for someone in their direct surroundings and social circles to read my thesis and identify them in it, it is a concern that is very present within this field. Sharing their stories in one-on-one conversations did not seem to be an issue, but people are often extremely hesitant for their stories to be recorded or written down. Not wanting to put anyone in a position where they feel pressured to engage with my research or share personal details, I thought it was best to not ask them for formal interviews at all.

Another point of apprehension was an unintended lack of transparency when it came to my positionality. Even though I was continuously honest and open about my reasons for being in Malta and how I came to volunteer at Dar Hosea, the nature of the organisation's day-to-day workings did not always allow for ensuring that everyone was aware of my background. As a day centre, people come and go as they please. Some spend every day there and engage actively in conversations, others keep to themselves or only attend it once a month or on specific occasions (for example when they have an appointment with the doctor). When people shared their stories with me, I could thus not be certain they had enough knowledge to make an informed decision to share it with me in a research context. Several times, especially in the beginning, the situation arose that I was assumed to be a new social worker and part of the staff. Based on this assumption, the reason for a person to share specific information could be to receive help, inform or update the organisation, or many other things outside of just wanting to share a story.

⁶ Dar Hosea's service users are exclusively women.

To avoid these issues and follow the principle of “do no harm”, I decided to primarily adopt the role of a volunteer while at the organisation, not as a researcher. Nevertheless, many of them shared their stories with me which has given me very valuable insight into the lived realities and issues that sex workers face that I would not have been aware of otherwise. It has also enabled me to gain a different, more situated perspective on the topic and the local situation by getting to know them on a more personal level and spending time together in an informal setting. So despite the limitations in terms of data gathering, my experience at Dar Hosea further informed my enquiry and increased my understanding of the situation in Malta significantly.

Who speaks for whom?

Due to the procedural restraints and personal deliberations stated above, no interviews with sex workers were conducted for this project. Accordingly, all of the perspectives stated in this paper are by stakeholders, not sex workers themselves⁷. Although some of the service providers have first-hand experience working with sex workers and/or migrants and shared their insights based on these interactions, their rendition of it is coloured by their own perceptions and interpretations. Therefore, it cannot be regarded as a primary source (i.e. from the perspective of a sex worker) when talking about sex workers’ experiences in the Maltese context. This limitation shall not be overlooked as it is crucial to not only talk *about* sex workers but also *with* them, to centre their experiences, opinions, and views. In this paper, I want to make it clear that I do not intend to speak *for* sex workers in Malta, but aim to discuss the stakeholder perspective of the people I have talked to. While this is not as close to the ground to the lived experiences of sex workers as this project was intended to be, it is not only a relevant perspective but also a necessary one. Throughout fieldwork, many of the people I talked to brought up the same issue: lack of data. There are only a handful of studies done within the field of sex work in Malta, most of them by students and many of them with more of a historical focus⁸. The ones with a qualitative lens, while providing some of the much-needed insight into their realities, often include only a few participants and more often than not just collect digital dust in the online library of the university. Additional to that are failed outreach programs and the general challenges of gaining access faced by stakeholders themselves. Thus I quickly

⁷ One exception to this is the conversation with Luca Stevenson from the European Sex Workers' Rights Alliance (ESWA), as he was engaged in sex work in the past. Notwithstanding, his experience in the Maltese context is limited and primarily within the scope of his position at ESWA.

⁸ See for example Muscat (2017) and OAR@UM (2023).

acknowledged that focusing on stakeholders as the main interlocutors would be much more realistic in terms of scope and access of this project. Furthermore, taking count of what services do (not) exist, why, and who is (not) using it are important insights that can inform further inquiry.

Chapter 1: Contemporary Sex Work Discourse.

The Basics

Sex work is often called “*the oldest profession in the world*” (Weinhold, 2023). However, in many parts of the world, commercial sex is a highly stigmatised and taboo topic to this day. In the last few decades, self-organisation of sex workers for their rights has become more common in Europe, in many cases supported by existing feminist organisations and movements (ICRSE, 2010). However, contemporary sex work discourse and activism is characterised by its highly polarised and moralised character. In this chapter, I will give a short introduction to two central elements of contemporary discourse - terminology and policy models - before describing the commencement of public debate in Malta.

Terminology and Definition

Language is a powerful thing. It allows us to convey thoughts, feelings, and behaviour to other human beings; to express our inner self in an attempt to make it more accessible and understandable to others. Far from being solely a practical tool that aids social organisation and living side by side with other people, it evokes real emotions and, sometimes, grave reactions. For such a powerful tool like language, it is astonishing how easily it can be misconstrued and misinterpreted. After all, as many thinkers have theorised⁹: The meaning of the message is created by the receiver as much as by the sender.

In the context of the discourse surrounding sex work, language holds a similarly powerful significance. Once you start to engage with the topic, it is impossible to not be confronted with this sub-debate of what is the ‘right’ terminology to use. Your choice of words can allow or deny you access to certain (activist) spaces, it can forcibly halt potentially important conversations prematurely, and your use of certain terms as well as your (lack of a) justification for using them can signal to people how legitimately they should think of your contributions. Although I had not previously engaged with the topic of sex work academically, I had been to some extent invested in it based on personal interest. Being part of a feminist activist organisation in Vienna for years, I had come in contact with the debate and informed myself about the situation in Austria. The importance of having a stance on terminology and

⁹ See for example Weber (2016).

deliberately choosing what terms to use was therefore an aspect of engaging with sex work that I was aware of. In my private life, I had been using term “sex work” as it seemed like the more frequently used one by the sex worker-led movements I was familiar with. However, once the initial process of approaching this topic from an academic standpoint took form, I revisited that decision.

The two most prominent options when it comes to terminology of referring to the sex industry and those engaged in it are “sex work” and “prostitution”, and “sex worker” and “prostitute” or “people in prostitution” respectively¹⁰. The term “prostitution” has been in use since the 16th century and most likely derives from the Latin “*prostituere*”, meaning “*to place before*” in the sense of “*expose publicly*” (Online Etymology Dictionary 2023), thus primarily used to refer to street-based workers. The historical prevalence of the term is likely the reason for its application in most policies and other legal texts to this day. Despite this, “prostitution” is understood to carry negative connotations and further stigmatise those engaged in the sex industry (Jeffreys, 2015). The more recent variation of “prostituted people” or “people in prostitution” attempts to shift the stigma from the person in question to their circumstances and the industry itself. Yet it is criticised as failing to do so by implying a lack of agency and victimisation of sex workers (Stella, 2013). As a reaction to this and coming from a need for a better alternative, Carol Leigh, American sex worker and activist, introduced the term “sex work” in the 1970s: Contrary to “prostitution”, this terminology was meant to “*unite*” people engaged in all kinds of activities within the industry, who are “*enjoined by both legal and social needs*” (Leigh, 2010, p. 229). The intention of an inclusive and non-discriminatory wording also comprised of highlighting the labour aspect by referring to people as workers, implying the entitlement to certain rights and protection by the state (Jeffreys, 2015). Born out of a movement led by sex workers themselves, it was part of an attempt to gain a sense of control over how sex workers are portrayed in the public discourse. Today, most sex worker-led organisations as well as international bodies use and endorse the use of “sex work” instead of “prostitution”.

¹⁰ However, it is important to point out that language is not only context-specific, but also shaped by the culture and society it is used in. No claim can be made on the universality of terms in use as well as their meaning(s) in different localities.

The World Health Organization, for example, employs the following definition:

“Sex workers include female, male, trans and gender diverse adults [...] who receive money or goods in exchange for sexual services, either regularly or occasionally. Sex work is consensual sex between adults, can take many forms, and varies between and within countries and communities. Sex work also varies in the degree to which it is more or less ‘formal’, or organized.”

(WHO, 2022, p. 46)

The notion of consent being inherent to defining sex work, however, is contested. In some cases, the differentiation between consensual and forced sex work is made. The argument being that, like in any other line of work, you can be a worker by choice but end up being exploited or coerced (Stella, 2013). Others dispute this by pointing out that while sex workers can experience unsafe labour conditions, any activity enacted due to force is abuse, not work (ibid.). The fact that the conflation of sex work and human trafficking has a long history makes this even more complicated: A UN convention introduced in the 1940s, for example, equated trafficking with prostitution and declared it *“incompatible with the dignity and worth of the human person”* (George et al., 2010, p. 64). Although more contemporary definitions of human trafficking focus on not making moral judgements and being more applicable to a broader range of situations relating to exploitation and forced labour, the deeply rooted connection is still omnipresent in many people’s minds. In reality, the line between trafficking and sex work based on concepts like consent is extremely blurred and often not a simple act of definition (George et al., 2010). Nevertheless, it is crucial to not generalise and equate sex workers with people in situations of trafficking, thereby denying them agency and framing the sex industry as purely exploitative and dangerous, adding to the stigma resulting in discrimination against sex workers. In the end, the conversation around terminology will likely never achieve consent among those involved in the sex work discourse. Some advocate for using the term(s) used by sex workers themselves, but this in itself is not a less complicated undertaking, as it hinges a lot on the self-identification of the person that is in some way or another engaged in commercial sex. Some are very open and transparent about it and have a clear preference in how they refer to themselves in that context. Others are less comfortable with being perceived or even perceiving themselves as being part of this presumed community or industry (Fuentes, 2023). The pressure of deciding on a term to talk *about* sex workers in some circumstances indicates a severe lack of talking *with* them. While I do not have sufficient insight into the terminology debate within sex worker

communities in Malta, it is my impression that it often has much more significance to those advocating for sex workers while not being one of them. If a given localised discourse involved more sex workers, conversation would likely focus first and foremost on their existing needs and issues and be halted less by excessive meta-discussions about terminology. After all, whether you refer to yourself as a sex worker, prostitute or something completely different, the challenges faced in accessing often basic human rights remain the same.

In the end, I opted to continue to use the term “sex work” for this project and define it as the following:

Transactional sexual services offered by consenting adult persons of all genders at different levels of formality and frequency.

While the vagueness and broadness of this definition can be mentioned as a valid point of criticism, it has served aptly for this study. However, over time, this definition’s purpose for the project transformed: Initially intended as a means to narrow down the focus of the phenomenon I wanted to look at, experiences of trafficking were thought of as opposing and outside of the scope. Once it has become clear that sex workers themselves would not be participating in the project, it changed to an idealised conceptualisation of that phenomenon that served more as a point of reference for enquiry than necessarily being a useful delineation. But following conversations with stakeholders and service users at Dar Hosea, it had become very clear that differentiating between human trafficking for sexual exploitation and sex work purely based on the (ascribed) extent of agency of the person in question is an unfeasible endeavour. Nevertheless, “sex work” emerged as the preferred term due to its less historically stigmatised nature and origin from the sex worked-led movement.

Forms of Sex Work

Furthermore, “sex work” remained the term of choice for this project exactly because of its broadness. “Prostitution” is commonly used to describe activities such as street work, stripping or erotic dancing, and brothel-like operations. Sometimes escort services and phone sex are also included. Shared characteristics of the activities covered within this (arguably informal) definition is the more or less direct contact with clients, the (assumed) participation in penetrative sex, and the occurrence of them in what are perceived to be ‘shady’ or unsafe spaces. However, many other activities fall through the cracks of this characterisation: Sugar babies,

pornographic content creation (e.g. on OnlyFans), medically assisted sex (e.g. for people with disabilities), bondage and dominants, and many more. Using the previously mentioned definition as a starting point, “sex work” can be employed as a catch-all or umbrella term for all of these activities.

In an attempt to create a more nuanced differentiation between the varied forms of sex work, categorisations according to their presumed risk factor have been developed. Harcourt and Donovan (2005), for example, have identified the following aspects as determinants of an activity’s risk level: The number of clients a sex workers sees on a typical day, as it has been shown to have a notable correlation to the state of health of the sex worker (e.g. the presence of sexually transmitted infections). Low income as it indicates restricted access to health care and safety precautions such as condoms. Additionally, being within disadvantaged communities or circumstances (e.g. homelessness, migratory journey, people with disabilities,...) as individuals might have fewer (social) means to negotiate appropriate prices. Lastly, they mention the existence of compulsive or addictive behaviour as determinative for a higher risk, as it has a profound negative impact on their health and can lead to sex workers taking on more clients to fund their addiction. Other authors identify proximity to “*elevated levels of violence*” as another noteworthy factor affecting potential risk (Surratt et al., 2005, p. 25), such as the extent of surveillance by police, corporeality (i.e. the level of intimacy with the client) as well as the lack of safety mechanisms as deciding factors. Within these categorisations, street-based work is almost always placed at the lowest rank (Sawicki et al., 2019). However, most of these conceptualisations run into the pitfall of being based on hyper-visible forms of sex work as well as white cisgender women (Erickson et al., 2000), thereby neglecting other identity factors that affect sex workers’ lived experiences. Further, the allocation of activities into pre-conceived “at risk” categories furthers the (de)legitimisation of certain forms of sex work. The same can be said about a framework aiming to classify the “*social location*” of individuals often used within certain sex work communities themselves, the so called “*Whorearchy*” (Fuentes, 2023, p. 227): A hierarchical categorisation with two of the main factors indicating a lower rank on the spectrum including the level of intimacy with the client as well as visibility (in the sense of being identifiable as a sex worker and being exposed to police surveillance). Fuentes (2023, p. 229) describes the Whorearchy as based on a hostility and fear of sex workers, or what she calls “*whorephobia*”. The stigma that sex workers are confronted with does not only come from ‘outsiders’ of the industry, but from sex workers themselves (Toubiana & Ruebottom, 2022). Individuals within the industry who apply the classifying logic of this hierarchy often do so in

an attempt to dissociate from certain types of sex work, specifically those that they deem less safe, desirable or more socially stigmatised (Fuentes, 2023).

Policy Models

Apart from terminology, another central inherent factor of the most prominent discourses surrounding sex work is policy. Although, while there are numerous overlaps and similarities in the way people discuss about sex work internationally, this discourse (like any other) has its varied meanings and particularities based on local contextualisation(s) and interpretation(s). It is thus not viable to make generalising statements about these positions as they are not monolithic and include a range of varying views and opinions even within one ‘camp’. By introducing these models and connecting them to certain beliefs and perspectives of interest groups, I do not want to reproduce the image of internally coherent lobbies with homogenous opinions and understandings that stand opposed to each other. Instead, the fixation on policy in the discourse and its perceived role in ensuring the safeguarding of rights and wellbeing necessitates an explanation of the leading policy models that guide the fundamental differentiation between advocacy groups. Additionally, they act as an important signifier of one’s positionality within the debate. Many activists, whether they are sex workers themselves or not, tend to identify primarily with one of these perspectives (Andrijasevic, 2010). As much of the conversation revolves around policy, picking one of these four paradigms seems like an obligatory prerequisite for being able to take part in the discourse and becoming a legitimate actor within it. The expectation to have a sufficient amount of knowledge of these policy models in order to be taken seriously and gain access to certain spaces acts as a form of gatekeeping of the debate. It might not always be intended as such and could also partly emerge from the goal of complicating access for those that are ill-informed and could bring about potential harm. However, in reality it leads to important discussions and decision-making processes taking place without those that have relevant and meaningful insights into the topic at hand. Not everyone has the resources needed to inform themselves about the central paradigms and their lingo, such as time, social capital, adequate ability to make sense of (sometimes quite legalistic) content, or access to this kind of information in the first place. The hyper-focus on policy thus at times constitutes an exclusionary force on the discourse and the possibility for sex workers to partake in it. The following paragraphs intend to first give a brief overview of the most prevalent positions before outlining how the topic of sex work found its way into Maltese public discourse.

Even though there are a few varying versions of the identified main policy models that guide the sex work debate, among the most common are the distinction of four different models and related advocate ‘camps’: Criminalisation, Partial Decriminalisation, Legalisation, and Full Decriminalisation.

Criminalisation, also called the **Prohibitionist Model**, penalises all sex work-related activities, including the offering, selling, buying, and facilitating of sexual services (Andrijasevic, 2010). Sex workers, clients, and anyone else involved in the industry can face charges ranging from fines to imprisonment and deportation (SWAN, 2020). This paradigm aims towards eradicating the sex trade as a whole as it is viewed as a “*social evil*”, immoral, and dangerous (George et al., 2010, p. 66). Subsequent outcomes of this policy model include increased discrimination and violence towards sex workers, reduced access to services, and facilitation of human trafficking as those affected fear legal consequences should they report or seek support (SWAN, 2020).

Partial Decriminalisation is more commonly known as the **Nordic Model** (based on the fact that it has been enacted in countries such as Sweden, Norway, and Iceland), the **Abolitionist Model**, or “**End Demand**” (SWAN, 2020). Positioned as a middle ground between Full Criminalisation and Full Decriminalisation, it incorporates certain views of both paradigms: While it is generally in agreement with the prohibitionists that sex work is inherently harmful, an infringement on human rights and should be stopped entirely, they acknowledge that sex workers themselves should not be stigmatised or criminalised in the process. They therefore advocate for the criminalisation of clients as well as of third parties i.e. those who facilitate and/or profit off of sex work, while sex workers should not be penalised for their activities (Hindle et al., 2008). With a strong focus on exit programs and aiming to protect sex workers from violence and exploitation, critics point out that criminalising clients and more organised forms of sex work (such as brothels) is de facto illegalising it. A heightened police presence in areas known for sex work as well as clients being afraid of arrest leads to moving activities further underground and into isolation, thereby increasing precarious working conditions (SWAN, 2020).

Full Decriminalisation (or most often simply referred to as Decriminalisation) on the other hand is, as the name suggests, in favour of fully lifting penalties for sex work itself and all related activities. This paradigm aims towards giving those within the sex industry increased

autonomy over what kind of work they do, where and how they do it. It is supported by numerous sex worker-led organisations as it is viewed to benefit individual and collective empowerment among sex workers (SWAN, 2020). Supporters perceive sex work as something that is a personal choice and a “*private matter between consenting adults*” (George et al., 2010, p. 66). Critics are concerned about Decriminalisation resulting in giving a ‘green light’ to exploitation and trafficking and therefore being favourable for abusers (ibid.). But a common misconception about Decriminalisation is that it is equitable with removing any and all legal mechanisms for those within the sex trade and thereby allowing for harmful practices to go unpunished. However, the model primarily calls for the repeal of all *sex work-specific* laws within the criminal justice system (Hindle et al., 2008). Existing laws regarding workers’ rights and general protective mechanisms would therefore remain, making exploitation, trafficking and violence punishable acts (SWAN, 2020). Nevertheless, individuals facing multiple marginalisations, such as migrant or trans sex workers, would still face legal and social discrimination under Decriminalisation, necessitating simultaneous revision of other policies (Fuentes, 2023).

The last of the “big four” is **Legalisation**. Also known as the **Regulationist Model**, it is frequently mistaken for Decriminalisation and the assumption of giving ‘free reign’ to the sex industry. Legalisation and Decriminalisation agree on the aspects of sex work being a legitimate profession and industry as well as that it should be addressed outside of the criminal law (Andrijasevic, 2010). The fundamental difference between the two is that under legalisation, sex work is legal but only under certain rules or conditions (SWAN, 2020). These regulations are decided upon by the state or local government and can take the form of obligatory registration, health check-ups, or the creation of specific approved zones, among others (George et al., 2010). This means while Decriminalisation primarily differentiates between legal sex work of all kinds and criminalised acts of exploitation, abuse, and trafficking, legalisation draws a clear distinction between legal and illegal forms of sex work itself (SWAN, 2020). Consequently, sex workers who cannot or do not want to adhere to the given regulations will still be penalised, even if they do it voluntarily, under consensual circumstances, and in the same localities as other sex workers who are “legal”. Critics say that regulation limits sex workers in their autonomy and are usually not (solely) intended to protect those in the sex industry, but enact structural power in order to control them in the name of public health and safety (SWAN, 2020, p. 11).

				
FACTORS	CRIMINALIZATION I.E. PROHIBITION	PARTIAL DECRIMINALIZATION I.E. ABOLITION	FULL DECRIMINALIZATION	LEGALIZATION I.E. REGULATION
You can face consequences for the act of selling sex	✓	✗	✗	✓ If you do not adhere to regulations.
You can face consequences for the act of buying sex	✓	✓	✗	✗
Sex work is viewed as inherently bad	✓	✓	✗	✗
Exploitation and abuse are illegal	✓	✓	✓	✓

Figure 3: Overview of Sex Work Policy Models

Sex Work Discourse in Malta: The Beginnings

One Sunday noon in September I made my way into Valletta, a fortified bustling city and the capital of Malta, to attend a pro-choice protest. Side by side, we walked through the narrow streets together in solidarity and the heat of the late summer sun, chanting Maltese slogans and “*my body my choice*” from the top of our lungs. After completing the route that started at Pjazza Kastilja in front of the Prime Minister’s office, passing curious groups of tourists and locals going about their day along our way, we arrived at Hastings Gardens located on the outer walls of the city. The atmosphere became more light-hearted, music was playing, and people turned from protesters to a community spending their



Figure 4: Valletta, Malta (28.9.2022)

Sunday afternoon together. I walked around to find Aaron, a fellow master student who had just finished his research on sex work, and I found him talking to a woman I did not recognise. “*So, did you change your mind?*” she asked him. Aaron, seemingly frustrated, rolled his eyes and replied “*No, Francesca, and I never will*”, to which she promptly retaliated “*Well, neither will I*”. They kept on going back and forth, arguing about his research and the reliability of his interlocutors which included sex workers working in Malta. It seemed to me like they have had this exact conversation (or argument) several times before and were just going through their lines like actors who had lost their passion for theatre. It was bizarre to watch them argue about choice and the bodily autonomy of sex workers in this space of solidarity and against the backdrop of banners and t-shirts with slogans such as “*Women’s bodies are not your political playground*”. After a few more minutes of this, the woman voiced some excuse and left. She turned out to be Francesca Fenech Conti, the head of a prominent women’s organisation and one of the leading people on the Nordic Model side in Malta, while Aaron Giardina holds a position in a political youth group, Young Progressive Beings, next to his job within the government’s Human Rights Directorate and was a clear proponent of Decriminalisation. As it turned out, they had indeed been studying together and have had this discussion countless times, but the outcome has apparently never changed. I was left wondering: How can someone go

from marching side by side for bodily autonomy, to not being able to have a constructive conversation with each other about it in the span of five minutes?

In the context of Malta, two of the previously mentioned paradigms take central stage: Decriminalisation and the Nordic Model (i.e. in support of client criminalisation). The vast majority of actors within the debate have aligned with either one of these policy models. While they do agree on certain aspects, as mentioned previously, there are fundamental disagreements between the two groups. But to explain this trend and the apparent animosity inherent in the local discourse, we have to go back in time a bit.

Reform on Human Trafficking and Prostitution

Sex work in Malta and the Mediterranean overall has existed for centuries and is well documented¹¹. More recently, in the 20th century, the topic became present in the media due to people's worry about its alleged rise posing a threat to public decency (e.g. Times of Malta, 2002). According to Maltese law, the practice of commercial sex itself is not explicitly criminalised. However, the conditions determined under the so-called "*White Slave Traffic (Suppression) Ordinance*" (2008) make it de facto impossible to exercise it legally and safely: It is punishable to solicit or loiter in public, to live off of the earnings of sex work, and to practice it in a dedicated establishment (i.e. brothels), one's private apartment or rented room. Additionally, anyone who is involved in or facilitates one of these acts (so-called "third parties" such as landlords, taxi drivers or managers) is also in threat of imprisonment and fines. Although the aim to revise the legislation was first mentioned in the Labour Party's electoral manifesto in 2017, this undertaking was not commenced until September 2019, when the "*Reform on Human Trafficking and Prostitution*" was initiated by then Parliamentary Secretary for Reforms, Julia Farrugia Portelli. From the beginning, there were two issues with the reform process: At the time, it emerged rather unexpectedly for most actors that were engaged within the field or related areas. Additionally, the time frame given for submitting a statement as part of the public consultation was relatively short: the document was published on September 3rd and set the deadline for submissions for October 31st, so less than 2 months. Those who felt drawn to take part in the conversation predominantly included activists and representatives from organisations working within the fields of gender, migration, and LGBTQ+ rights. There was a subsequent scramble to draft a submission to answer the public consultation call in the

¹¹ See for example Leiser (2016), Mummey & Reyerson (2011) and Muscat (2017).

following weeks. The document itself proposes decriminalisation of sex workers and improved measures pertaining to access to services and exit programs, among other suggestions (Public Consultation Document, 2019). There is no explicit mention of proposed policies concerning clients or third parties, although a “*call for the removal of criminal laws targeting prostitution*” could be interpreted as such (ibid., p. 7). The focus on policy (due to being a governmental reform and revision of existing laws) in combination with the time pressure might have led to the more or less instant resort to one of the existing predominant policy models described previously. However, it seemed like most participating actors had already previously decided on or identified tendencies regarding their position.

Dr. Anna Borg, senior lecturer at the Centre for Labour Studies at the University of Malta (UM), founder of Association for Equality (A4E) and one of the most prominent proponents of the Nordic Model in Malta, recounted the following:

“[...] In 2017 in the manifesto of the Labour Party [...] there was a small sentence to the tune that government plans to legalise sex work. [...] That's when the alarm bells started [...] and we started forming a coalition of experts. [...] And by putting our heads together, we started formulating this document [...] where we kind of came up with a legal framework based on feminist values and also based on a model which would protect the women, first and foremost, but would not encourage and increase trafficking. [...] And once we formulated our basic thoughts, we opened up discussion with all women's organisations in Malta who endorsed it.”

(Anna Borg, interview 25.8.2022)

Their position and efforts to advocate for the Nordic Model being well known, prompted the other actors, primarily NGOs working within the migration sector, to take up a sort of counter position:

“We were kind of the only NGOs that went against the grain from all the other NGOs that were more pro-Nordic Model, as opposed to us who are more ‘Decrim’ [...]. And also, maybe because we work with migrants, we see it as well from a perspective that maybe is not seen by other more [...] feminist NGOs, that usually see sex work as the Maltese woman on the street, who is maybe forced due to, say, drug addiction etcetera. So they are two different things and we wanted to make that point.”

(NGO Representative, interview 1.8.2022)

From the beginning, both groups were concerned about the debate escalating in a direction that they perceived as harmful to the people they meant to protect and felt called to constitute an opposition. One advocate summed it up as: *“The way it ended up was basically a battle between Nordic Model and Decriminalisation. And it's always like that, black against white, you know. So it became a bit of a ‘us versus them’ and became very conflictual.”*

There were two primary submissions, one from each group: A joint submission by aditus foundation and Integra (2019) in favour of Decriminalisation, and one spearheaded by Association for Equality, Dar Hosea and Women’s Rights Foundation (2019) in support of the Nordic Model (i.e. client criminalisation). The presentations and discussions in parliament as part of the public consultation process only further fuelled the animosity between the two sides:

“It was a very hostile environment. My friend who was sitting in the room observing, she happened to be next to someone who was translating from Maltese to English and she said that she overheard this person referring to some of the people who were presenting on decriminalisation of sex work. She was referring in translation saying ‘Okay and now this bitch is saying this, this and that’. [...] So these were obviously some of the civil society stakeholders in the room. That just shows the kind of animosity between the two groups.”

(Mina Jack Tolu, trans activist and Deputy Chair of Malta’s Green Party, interview 22.9.2022)

“Interestingly the General Workers Union [...] is pro-Decriminalisation as well [...]. And because it was two men presenting their position, they were attacked verbally during the meeting. By the feminist organisations [saying] “How dare you!”. Because they were talking in terms of employment, in terms of provision of services, [...] basically workers’ rights. [...] The feminist organisations that were present took great offence. ‘You are men talking about selling women's bodies’. [...] So [the presenters] were basically told to shut up. And even the members of the committee that were present were passing comments [aimed at the speakers], ‘That's shocking’ or ‘You shouldn't talk like that’.”

(NGO Representative, interview 1.8.2022)

Throughout the conversations I had, several of these instances of verbal attacks and disrespectful exchanges were recounted. The discourse in general was frequently described as

being antagonistic, patronising, and exclusionary. While it seemed that most explicit aggression targeted proponents of Decriminalisation, an intense feeling of frustration and mutual disconnect was felt by both sides. It is important to point out that there was a significant difference in numbers on the opposing sides: While those in support of Decriminalisation at the time consisted of only about a handful of people representing three to four entities (two of which had drafted the previously mentioned position paper), the Nordic Model supporters included of more than 20 local stakeholders as well as a few international organisations that endorsed their joint submission. It is unclear to me how exactly this disparity in numbers was reflected during the meetings in parliament. On the one hand, it indicates a sense of strength-in-numbers that might have resulted in the evident hostility. On the other hand, it has amplified the resentment of feeling ignored despite representing a majority in the local discourse, as put into words by Maria Borg Pellicano, social worker and coordinator at Dar Hosea:

“Unfortunately, all organisations, all individuals who actually signed the coalition were ignored. [...] If we are the front liners, if we're trying hard to speak on behalf of our women, at least involve us. Even if eventually you will still ignore us in your final decision, but at least listen to their stories. Do not listen to the stories of anyone who are saying that they are experts, but actually they are not working in the field [...].”
(Maria Borg Pellicano, interview 16.8.2022)

Much of this frustration revolves around the appointment of the technical committee that was in charge of the reform process:

“I think it was a fake kind of process. [...] It was clear that they weren't really interested in listening to us and what we have to say. In fact they excluded us and that's why I say it was like more of a rubber stamping exercise to say ‘Yes, we have done this process and we tried to get a discussion going’. [...] And a clear example is that the government set up a technical committee on the prostitution reform and they excluded all women's organisations. Nobody was invited. It was all people very close to government, handpicked by government.”
(Anna Borg, interview 25.8.2022)

These recounting exemplify a greater underlying reason for the partially negative relationship between the actors within the debate, a mistrust of government and politicians. It was felt by representatives from both ‘camps’ that the whole consultation process was more of a formality

than intended as an actual space for discussion: *"It's done from the very top down approach. It's more like a box ticking exercise. Like, 'Oh, we consulted the community' kind of thing"* (Mina Jack Tolu, interview 22.9.2022). Even though it might not have been perceived as such from the beginning, once the position as parliamentary secretary in charge of this process was passed on to Rosianne Cutajar in January of 2020, her personal opinion was more transparent to the people involved. By publicly opposing client criminalisation, her views were clearly more in line with the Decriminalisation model (Magri, 2020).

A few months later, the Covid-19 pandemic started and shifted the focus to more pressing issues. Furthermore in 2021, due to a political scandal connecting Rosianna Cutajar to a person who was involved in the killing of Daphne Guarana Galizia, a Maltese investigative journalist, she resigned from the government position (Zammit, 2023). Up to this day, the reform process has not formally been completed. In a conversation with the current Parliamentary Secretary of Reforms, Rebecca Buttigieg, she stated:

"These past few months I've taken stock of discussions which took place in the past legislature so that we would take a snapshot of the current situation and see how we can move forward. [...] I took notes of all the discussions because I feel like you have to be informed in order to make a decision. I can't just wake up one day and say we're going to legislate. [...] What my role will be in the next two years is to continue these discussions."

(Rebecca Buttigieg, interview 6.10.2022)

However, Dali Agrebi recounted the following from their conversation with the government official:

"Two days ago we were in a meeting mentioning the sex work reform and she said this is something off the table for now. [...] She said if they decide internally to start working on it and pass it, they don't want to go through the same process. So if they have something ready, it will go directly to the Cabinet and then Parliament because it passed through the public consultation."

(Dali Agrebi, Integra, interview 14.10.2022)

As of the writing of this thesis, there have been no changes in reforms or re-appointment of the Technical Committee, sending a clear message that, at least for the current legislature, policy

change regarding sex work in Malta will not happen. Despite this, the debate between the non-governmental stakeholders has continued. The discourse had “fizzled out” and moved from parliament into the online sphere in the form of parallel monologues through newspaper articles and social media posts. There were a few panel discussions here and there that almost exclusively further deepened the already-established differences between the opposing groups.

In this chapter, I discussed two prominent themes inherent to contemporary sex work discourse, terminology and policy models, followed by an outline of the reform process launched in 2019 that set the scene for the public discourse in Malta from then on. In the following chapters I will analyse this discourse as well as participants’ stakes within it in more detail.

Chapter 2: Navigating Perspectives.

Understanding Engagement in the Sex Work Discourse in Malta

Sex work is not only a contested topic, but one charged with numerous meanings and emotions. In my research, I talked to people from different fields, backgrounds and positionalities. As a result, multiple factors shaping someone's engagement in the discourse have emerged. Exploring the reasons why individuals are involved or interested in the sex work debate has turned out to be one productive line of investigation into the existing phenomena of hostility and collaboration in the Maltese context. I have differentiated these potential reasons into three categories: Professional obligation and activism, personal emotional connection, and ideologically-informed perspectives. These factors, however, do not function in isolation of each other but form an intricate interplay of some or all of them together. Likely combined with a range of additional aspects of a personal nature that were not discernible in the limited window I received into the thoughts and feelings of my interlocutors. The aim is not to develop a universalist explanation but to spend a few of these pages attempting to look behind the professional façade and explore why people take part in this debate and how it is consequently shaping it.

Professional Obligation and Activism

The first path of stakeholders into the sex work discourse in Malta is that of what could be called professional obligation. For some, their participation in it is a direct result of their job or occupation. Service providers, such as medical professionals or social workers, and those in relevant state institutions, such as the Police Force and political representatives, are prominent examples. Involvement in the discourse can take different forms. Thus, while they are staying somewhat informed about the development of the local debate and changes in policies, it is primarily to keep in line with regulations in their everyday work. Actual proximity to the topic and those engaged in the sex industry does thus not determine involvement or necessitate dedication to advocacy. Accordingly, they do not tend to assign themselves as explicitly to one of the prevalent paradigms. From the conversations I had with those within the public services, it became clear that they did not engage in the discourse in the same way as advocates. Although they were familiar with the terminology and general demands of the two dominant policy

models, they did not demonstrate the same level of identification with them. Consequently, even though most had an evident tendency of which their personal opinion aligned with more, they were generally more open to having a nuanced stance that did not have to be on either end of the proposed binary spectrum but could be located in the grey zone in between.

“We can have this conversation forever because I wouldn't know which [is the] best model. [...] So, I wouldn't have a clear cut answer for that. But yeah, everyone says something is wrong, be it this side or this side. So as long as something wrong is happening, as long as that something wrong is paying good money, then you can never have a right way to go about it.”

(John Spiteri, Vice Squad inspector, interview 24.10.2022)

The other prominent group is primarily made up of academics and NGO representatives. This group consists of the actors that are most engaged in the local discourse and advocacy. This is, at least in part, due to the fact that there seems to be a certain pressure for people in these positions to have a public opinion about the topic in question. Unlike the previously mentioned stakeholders, it is acceptable for their professional positioning to be clearly congruent with their private beliefs. The reason behind this is that their roles are closely linked to opinion-making and disseminating instead of service provision or enacting state regulations. Academics, especially within the social sciences, and NGO workers in Malta seemed to either end up in these careers because of a personal (perceived) connection and passion for the field or attain one over time. This often goes beyond a general interest in the topic as their work is closely linked to their values, morality, and personal experiences, more (explicitly) so than in public offices:

“So basically I've been involved in women's issues all my life. Either through the Malta Women's Lobby or an organization which I set up, A4E, Association for Equality. So you know this is very much my passion, my life, you know pushing for women's rights.”

(Anna Borg, interview 25.8.2022)

Consequently, much of their professional work comes to be somewhat overt acts of advocacy. NGO representatives differ in the more or less professionalised extent of their occupations, whereby some are employed in their organisation as their primary job, while others are doing it fully voluntarily next to their main source(s) of income. Among my interlocutors, the second

scenario seemed to be prevalent, although it was not always clear whether they were being paid for their engagement in the organisations. Due to this intertwined state of the professional and personal, advocacy is a core part of their roles. But when and why does it turn into activism?

While the two terms are often used interchangeably, some scholars distinguish them in the sense that advocacy is the “*core activity of all social movements*” enacted as “*persuading or arguing in support of a specific cause, policy, idea or set of values*” (Pezzullo & Cox, 2016, p. 177), while activism can be defined as advocacy taking the specific form of a “*direct and noticeable action to achieve a result*” (Johnston & Gulliver, 2022). Actions could include partaking in a rally, signing petitions, or forming advocacy groups. In the case of Malta, one possible “*trigger event*” (Moyer, 1987) for this shift from advocacy to activism was the public consultation process in 2019. There was a certain pressure for representatives of adjacent advocacy groups to take part in the reform process by submitting a response, attending the meetings in parliament, and speaking at other events debating the issue. Occupying a certain role in society, especially in the public sphere, comes with certain expectations. These expectations have two primary sources: Other advocates, and the individuals’ themselves:

“Everyone is always and everywhere, more or less consciously, playing a role. [...] It is in these roles that we know each other ; it is in these roles that we know ourselves. [...] In a sense, [...] the role we are striving to live up to [...] is our truer self, the self we would like to be. In the end, our conception of our role becomes second nature and an integral part of our personality.”

(Park, 1950, pp. 249–250)

What Park describes goes hand in hand with Goffman’s (1956, p. 9) concept of a “*social role*” which he defines as the “*enactment of rights and duties attached to a given status*”. Not taking a stance on this issue and participating in the discourse would have consequently possibly felt like not fulfilling their “*duty*” and therefore failing at their role. In the case of a formalised occupation, this (perceived) failure could have practical repercussions on their employment. Those engaged in activism in Malta on a voluntary basis next to their main source(s) of income might face potential consequences too: Some activist (organisations) that had not (yet) openly positioned themselves were met with criticism or even suspicion by some. The playing field in Malta, so to say, is small and if one organisation or individual who is even somewhat related to the topic at hand does not position themselves, people notice. The advocacy network is one of

the main “arenas” of activism and constitutes an important source of support (Johnston & Gulliver, 2022). So when the pool of advocates is limited and the prevalence of polarity is omnipresent, you need every possible ally on your side. Even though it is not always the case, as demonstrated by the consultation process, strength-in-numbers is an important strategy to win certain debates.

Selective Solidarity and Collaboration

Coming back to the sex work debate, how can this line of thinking then explain the expressed and experienced hostility on one hand, and the simultaneous collaboration and mutual support in other endeavours on the other?

As stated before, is not viable to characterise a given relation only in the light of a single role or connection. Even if one in particular is being highlighted in a specific context, all the others still exist and affect our thoughts, perspectives and behaviour. On some occasions, it might lead to thinking more amicably or nuanced about a person or their views, while other times a conflict in one setting might create a fertile breeding ground for another conflict in a different context. This, added to the emotionally charged character of some of the issues being debated, can lead to public discourses that are much more personal than they make themselves out to be. For the most part, the involved advocates view each other as valuable allies and important sources of knowledge, support and access. Feminist, LGBTQ+ or migrant rights activists have agreed on many significant points with others in their advocacy network in the past and continue to do so. Often constituting a unified opposition to other interest groups or the government, they had to work together and depend on each other to pursue their shared goals, demonstrated for example by their shared membership in the Voice for Choice coalition¹². Even though some of them fundamentally disagree in the case of sex work, these prior and co-existing experiences and ties are not forgotten. The following is an excerpt from my fieldnotes that I wrote after the previously mentioned pro-choice rally, reflecting upon the experience:

*“There is still **respect** there. They do take each other seriously in a way, just not their position. Which might be part of it, making it harder to understand why someone you respect and see yourself on eye level with would have a seemingly fundamentally different view on certain things than you. It must mean they ‘just don’t understand’ how*

¹² <https://www.voiceforchoice.mt/>

*much their view would hurt the people at the core of the issue. They might have 'the wrong data' or are 'blinded by other ideals'. [...] It might also partly come out of necessity. There already is a shortage of people that (a) care about [abortion] and (b) are willing to talk about it in public. You **need** to collaborate and work together; you cannot afford to let grudges coming from one issue carrying over to others that you need their support for or participation in."*

(Fieldnotes, 25.9.2022)

Although interlocutors had recounted stories about feeling disrespected and not taken seriously by their counterparts, there was always a sense of mutual respect, as humans, scholars, and activists. In fact, having respect for the people 'on the other side' and having had good experiences of cooperation can make it even more frustrating to be in such a divisive situation. It seems everyone believes that, at the end of the day, the advocates involved have the ability to be informed, educated, and change their minds to support the 'better' paradigm. They believe that their underlying intentions are good, but that their perspectives are misguided. Comparable to disagreements with family members, we attempt to either educate them or reach a point of "agree to disagree" in order to keep the relationship or a certain harmony within the family intact. Unless the disagreement is about one of our fundamental values, in which case it might lead to a more impactful conflict and repercussions on the interconnected relationships. The disagreement about the topic of client criminalisation seems to not pass this threshold of being too fundamental, as the more essential agreement is about the decriminalisation and safeguarding of sex workers themselves.

For people to (be able to) take part in a given discourse or community, Gershon (2019, p. 407) identifies the following factors that ultimately need to be in place: They need to collectively "*determine what is available for moral debate*" as well as "*know when and how people share understandings about what constitutes sameness and difference*". Therefore, they do not need to necessarily agree on things, but instead have to share an adequate comprehension of why, how and about what they do (not) agree on. This understanding is not objective or determinative. Instead, it is in a constant process of (re)negotiation that is embedded within social, cultural, political and ideological structures, following more of an internal logic of the group in question. Advocates within the sex work discourse have a rather clear grasp on both of these above-mentioned elements and know "how to play the game", so to say. In other terms, they are closely familiar with the specific "*social front*" that this discourse has evoked, the

“expressive equipment [...] which regularly functions in a general and fixed fashion to define the situation [...]” (Goffman, 1956, p. 13). The expressive equipment in this context ranges from the employment of specific narratives, utilisation of specific terminology, to non-verbal cues and reactions. Over time, this particular front can become deeply ingrained in a distinct setting, resulting in the following:

“A given social front tends to become institutionalized in terms of the abstract stereotyped expectations to which it gives rise and tends to take on a meaning and stability apart from the specific tasks which happen at the time to be performed in its name.” (Goffman, 1956, p. 17)

The interactions between advocates in the sex work discourse consequently became more or less cemented in a specific kind of performance that is now being carried out like a script, with less room for adaptations and changes as time goes on. The discourse, therefore, has become a *“collective representation”* (ibid.) of what (most of) the people involved have (subconsciously) agreed upon being acceptable ways of engaging with each other within this discourse. However, as these social fronts or performances are highly context-dependent, multiple ones can exist at the same time involving the same people. Therefore, the seeming contradiction of advocates closely collaborating on issues like abortion while antagonising each other when it comes to sex work can be explained through the background of their multiplex relations fostering fundamental mutual respect combined with the emergence of context-specific distinct social fronts.

Multiplicity of Roles and Relations

Malta’s size and societal landscape play a central role in the characterisation of public discourse. For most issues, the core advocacy network seems to be quite static, with the same pool of 10-12 people often talking about the same topics. Even though Malta has almost 2000 registered voluntary organisations (Malta Council for Voluntary Sector, 2023), there seem to be about a dozen of them that are more prominent in the public discourse, particularly when it comes to topics like gender or migration. Additionally, some individuals are represented in multiple organisations as (co)founders or board members. The phenomenon of tight-knit communities and *“everyone knows everyone”* applies here, too. People from organisations in similar fields find themselves regularly interacting and collaborating with each other, based on a shared thematic focus, aim or target group. Outside of advocacy, many of them have additional

(preceding) relationships with each other, for example as fellow students, colleagues, friends, or even family. One prominent example is the Dimitrijevic family¹³, who established their own organisations: Maya (the daughter) co-founding the youth group Young Progressive Beings (YPB), Lara (the mother) establishing the Women’s Rights Foundation (WRF), and Aleksander (the father) initiating Men Against Violence (MAV). While they share some sentiments, such as supporting gender equity and being pro-choice when it comes to abortion, they fundamentally disagree on the sex work policy debate: YPB is explicitly in support of Decriminalisation while WRF was spearheading the joint submission in favour of the Nordic Model that was also endorsed by MAV. This is just one of numerous examples of how advocates relate to each other in multiple ways in their public and private lives. The prevalence of this phenomenon can be identified as a unique feature of the Maltese discourse. What Boissevain (1974) calls “*multiplexity*”, namely the existence of multiple ties between individuals based on different relations or contexts, naturally affects the public political discourse:

“Clearly in a many-stranded relation between two persons it is impossible to characterize the relation in terms of any single role. [...] Where a many-stranded relationship exists between two persons, there is greater accessibility, and thus response to pressure, than is the case in a single-stranded relation.” (Boissevain, 1974, p. 31)

Multiplexity can therefore also be one cause for the previously mentioned (more or less) implicit pressure to engage in certain discourses in the first place. The other side of the coin of multiplex relations in small-scale societies is the fact that one person often occupies multiple professional roles, too. In Malta, it is rare that someone involved in advocacy only ever represents one organisation or institution. More commonly, people wear multiple hats and pick them depending on the context: Be it a press conference (professional hat), a panel discussion (professional activist hat), or a rally (private activist hat). This is reminiscent of Gershon’s (2019, p. 408) concept of “*oscillation*”, whereby individuals or groups of people “*consciously interweave the forms of moral orders available to them, alternating between which one is foregrounded in a context that is often spatially defined*”, i.e. different situations necessitate or enable different social roles and dynamics. This can be both advantageous and disadvantageous to advocacy. For example, the presence of someone who is known to also hold a position in

¹³ Although I unfortunately did not have the chance to talk to them, they are in their own right public figures and present within this debate.

governmental institutions or other state-related authorities enables activists' ideas and perspectives to indirectly gain access to those spaces through a less formalised 'backdoor'. However, their presence can also be experienced as an invasion of activist spaces and discourses. As one interlocutor shared, this can result in not feeling comfortable to express certain thoughts due to the concern about possible conflict and repercussions:

“I'm not saying let's not speak, but I do not want them to be in meetings where I'm discussing strategy, policy recommendations. I don't want input from the government into the input I'm giving back to the government, [...] It kind of defeats the scope and also defeats the openness. Because the way I speak to someone in an NGO is very different to the way I talk with someone in government. [...] Don't get me wrong, I trust them. And I've worked with them before. [...] I think that is something that, at times doesn't sit well with having people on a coalition who are part of the administration forwarding this policy [...].”

(NGO Representative, interview 1.8.2022)

Advocacy networks thus are communities that are in constant negotiation and consideration of risk and benefit. There is the challenge of keeping its boundaries “*leaky in the right ways*” (Gershon, 2019, p. 405) in order to grant people with multiple roles access according to the context-specific assessment of the (un)desirability and (dis)advantageousness of their presence. While every person naturally occupies numerous roles in their life, each with their own respective expectations, interests, possibilities, and concerns, navigating these (at times contradictory) facets of human existence is a complex feat. Embedded within multiplex relations and the (sub)conscious decisions of which roles and facets to highlight in a given situation, expressed perspectives and thoughts have to be seen within the context of what primary aim the individual is trying to achieve. We speak very differently when we express purely personal opinions versus views that are expected to align with or might have direct consequences for our professional position. Several interlocutors who seemed decidedly clear on their stance in fully supporting one or the other policy model have shared that, in truth, they are not 100% convinced of it themselves. Although not budging from the perspective that their preference is the better option, the topic of possibly having to create a hybrid or completely new model that is adapted to the specific spatial, historical, cultural and societal conditions of Malta has come up frequently in conversations. At the same time, this has not been much of a topic of public debate. So, as these expressions of personal views can at times look vastly

different from each other, which one then is their 'real' opinion? After all, "*though an individual wears different hats on different occasions, he is still the same person*" (Boissevain, 1974, p. 31).

According to Kleinman, this phenomenon of divided emotions and hidden values is at its core an issue of professionalism: "*Here the hidden conflict is between what the professional persona seems to demand and what the personhood of that professional actually feels but cannot or will not speak.*" (Kleinman, 2011, p. 805). The reason for strategically concealing certain views and contradictions has several aspects to it. For one, as in Kleinman's (2011) example of medical professionals, the two sides might not be reconcilable in certain situations, due to the duty of the professional role or a more structural issue of neglecting subjectivity in the sense-making and decision-making processes within a given field. However, this concealment can also serve to maintain some control over the situation, either as an individual's (sub)conscious choice or a collective effort to avoid open contradiction or conflict (Goffman, 1956). In some cases, personal or 'true' feelings only come to light outside of group interactions or through subconscious (non-verbal) expressions and behaviour (ibid.). The stronger the demarcated line between professional and personal (either by the person themselves or their circumstances), the more likely this is. As mentioned previously, sharing clear or seemingly personal views is less acceptable for those in public offices and in higher ranking positions. Whereas it is less of an issue (if not expected) for those with a strong advocacy background. Aaron Giardina, manager at the Human Rights Directorate and vice-president of Young Progressive Beings, has shared his perspective on this topic:

"Pretty much my whole life revolves around human rights. What I try to do to navigate through it and not like, have a conflict of interest in a way - because I work specifically in LGBTQ rights for the government, so I have some more intel about what's going on there [...] - I try to limit my activism in that area. So myself as someone who identifies as a gay and non-binary person, I try not to involve myself heavily when it comes to activism in that sector. So yes, I'm very vocal sex work wise, I'm very vocal about pro-choice. LGBTQ rights, as much as I support, and as much as I can provide 'my expertise', in inverted commas, I try not to be too visible in that regard. Because I can make the distinction, but maybe other people cannot. So I'd rather just back off, and I leave it up to the others who are also queer."

(Aaron Giardina, interview 26.10.2022)

Personal Emotional Connection and Morality

“When I speak about women, I always think of my own daughter. What would I want for her, you know? I would want real opportunities for her and she would choose, and earn a living and something she wants without having to resort to- you know.”

Anna Borg, interview 25.8.2022

As Kleinmann et al. have said, *“daily life matters”* (2007, p. 1528). And what matters is defined, at least in part, by moral concerns or as he calls it the *“moral mode of experience”* (ibid.). Our morals affect everything we do, the decisions we make, and how we feel about certain situations and pieces of information. There is a seemingly endless amount of literature talking about the varied definitions, origins and limitations of morality¹⁴. As this is not intended to be a philosophical treatise of the topic, I will approach it from an emic and inherently subjective perspective, guided by the meaning(s) ascribed to it by my interlocutors. According to them, morality seems to be the enactive feeling that something is *“just not right”*. We all have this feeling at some point, although to potentially vastly different degrees and situations. Just like a kid might have a strong emotional reaction to a butterfly succumbing to a car windshield on the highway, while most adults are hardly phased by the same incident. Our morality is significantly affected and decided by our personal experiences and what we are familiar with (Narvaez & Lapsley, 2005). They make us aware of certain situations that we deem to be unjust or wrong and lead to an embodied perception of them, deepening their presence in our conscious and subconscious mind. What I just described is what Kim and Gruning (2011, p. 128) call the phase of *“problem recognition”*: What we perceive as a problem is not external to us, but constructed inside our minds. It is being confronted with a certain situation or piece of information and experiencing it as a *“felt difficulty”* (Dewey, 1910, p. 72) due to our moral, social, or ideological values. This is one way people end up being engaged in the sex work discourse without initially having personal experience with the topic themselves. Maria Borg Pellicano shared her path to working at Dar Hosea:

“So before I was volunteering with [Dar Hosea], we were organising summer camps for children in the community [...]. It was so clear that these girls, when they weren't attending our summer camp, they were being involved in situations of prostitution, or

¹⁴ See for example Hooker et al. (2000) and Pojman & Tramel (2009).

their mothers were involved, and they were already being exposed [...]. Which was so concerning for me at the moment, knowing that these kids were trying to come and enjoy their situation as kids. [...] This realisation that some of [them] are coming from these realities, since I was already involved with these kids, [...] maybe it struck me more as it was more close to home. So this was, I believe, my first call, to put it this way, to eventually start actually working in a professional manner with these women.”

(Maria Borg Pellicano, interview 16.8.2022)

The positioning of Maltese stakeholders can therefore partly be explained by the kinds of realities they personally have access to. This was reflected in many of my interlocutors' experiences: The central proponents of the Nordic Model have predominantly been in contact with people and/or stories of Maltese women in situations of forced commercial sex (through representing them in court, for example). While those in support of Decriminalisation have had contact with individuals from other lived experiences such as queer and migrant sex workers (through the LGBTQI+ community or supporting them in legal matters). Both types of insights and subsequent positionings are thus valid and generally arise from a place of empathy. How then, if people from both sides act out of notions of care for sex workers, do they end up talking to each other “*like a deaf and blind person arguing with each other*”, as someone aptly put it once in a conversation?

The issue is that there is no objective right or wrong in this world. Even the most violent and extreme acts of seemingly immoral behaviour can hold a multifaceted complex of rationales and reasonings within them (Scheper-Hughes, 1991). Morality is not static but ever-changing and situational. As it is only based on what we know so far, it is constantly altered by gaining new information or experiences (Levy, 2014). In the present debate in Malta, this condition of moral relativism is not commonly acknowledged. Instead, the opponents accuse each other of supporting views that are actively hurtful to the very people they aim to protect:

“But let's say that we are speaking about this concept of sex work, and that women are actually happy to be involved in sex work. [...] However, we need to consider also the common good, the greater good, the situations that we are being presented with at Dar Hosea as well. And this is what concerns us exactly, that we do not want women who are already victims of prostitution [...] be the victim, be the sacrifice of the law which

will only safeguard the privileged.”

(Maria Borg Pellicano, interview 16.8.2022)

“This dialogue that some part of the feminist and religious organisations have is like ‘oh, we need to abolish prostitution’. The way it translates for people is that ‘we don't want prostitutes’ [...]. You can try to make the mental gymnastics, ‘You know, what we mean is that the women are victims, but the men are evil and need to be criminalized’. For people it just means ‘we want to live in a world without prostitutes’. And that really increases the level of violence and stigma.” (Luca Stevenson, coordinator at ESWA, interview 19.8.2022)

As these statements show, Decriminalisation and Nordic Model proponents alike agreeing on the fact that sex workers themselves should be safeguarded and not criminalised. However, this and similar fundamental agreements are quickly forgotten once the conversation commences. After the initial problem recognition, the people involved with this discourse experience an increase in “*communicative action*”, i.e. a person’s heightened engagement with the topic at hand (Kim & Grunig, 2011, p. 125). In the context of Malta, this process was incited for some by the launch of the reform process in 2019. It not only increased awareness of the issue in question by those that felt the impetus to take part in it, but also exacerbated a felt sense of threat or urgency. Stigma, Kleinman et al. (2007, p. 1528) say, is a fundamentally moral issue and can be strategically imposed to combat such a perceived threat: “*Both the stigmatizers and the stigmatized are engaged in a similar process of gripping and being gripped by life, holding onto something, preserving what matters, and warding off danger*”. The perceived dangers that prompt stigmatisation and hostility in this scenario are harmful actors such as exploitative third parties or discriminatory systemic practices. But instead of tackling them directly, advocates regularly project the notion of threat onto their opposition in the discourse and engage in actively stigmatising them and their supported paradigm, for example by labelling it and their advocacy as misguided or harmful to sex workers. This might be due to proponents of a given policy model being viewed as an extension of these perceived threats, as a “first line of defence” they have to defeat in order to take on the actual actors and factors endangering sex workers’ wellbeing. There is, however, a significant detachment between the embodied sense of danger and the efficacy of engaging in this ‘battle’ between Decriminalisation and the Nordic Model: Although policy is an important factor in this debate, by now it is clear to most advocates that there will not be a policy reform in Malta anytime soon. Therefore, continuing this debate with

people who are already in agreement about the most important aspects in a hostile manner culminates in an endlessly frustrating stalemate without any real change. Why, then, continue in this way?

Feminist Paradigms and the Role of Agency

The illegalised and covert nature of the sex industry in Malta is a challenge for advocates and service providers alike. Outreach is extremely difficult and usually unfruitful, and holding those at fault for exploitation and abuse accountable is often impeded by corruption and an inefficient legal system. The opposition within the discourse is therefore an easy target to continue the fight for what they think is right without giving in to feelings of helplessness and lack of control. After being engaged in this discourse for several years, reading about and having contact with people with personal experience in sex work (although to a limited extent for most), it could be assumed that this might potentially lead to some individuals adapting their (morally-informed) positionality within the debate. Instead, it seems like a rare if not non-existent development. Everyone appears to have stuck to their original alignments, even those whose decision had been made more hastily. There are a few people who actively do not position themselves with one of the prevalent sides. However, these were most often either non-Maltese activists or those in high-ranking roles where publicly stating your personal positionality is not as acceptable. So, where is this phenomenon of strictly sticking to one's initial opinion coming from?

As mentioned previously, one's moral values can be affected by personal experiences or receiving new information (Levy, 2014). But how we analyse and make sense of these new inputs is guided by a range of factors outside of our own disposition. Our opinions, thoughts and even feelings are influenced by the social and cultural context we grow up and live in. This is, however, not a purely deterministic process, and the actual interpretation is still dependent on the complex inner workings of an individual (an aspect which I will not attempt to explore further in this paper). In the context of advocacy, this can arise within the process of "*information selection*", whereby more information is sought out (with differing levels of deliberation) to inform the solution of a perceived problem (Kim & Grunig, 2011, p. 122): In this phase, a "*subjective rule of relevance*" (ibid., p. 125) is applied, meaning that information is being categorised into being more or less useful for the problem in question. Even though this is in itself a logical and important process, as treating all information as equal can result in an ineffective overload, there is a difference in how open one is in dealing with new pieces of

information. Those engaged in the discourse in Malta seem to predominantly enact a heightened level of “*information forefending*” (ibid., p. 126), or being increasingly strict and systematic in what kind of information they deem relevant. This classification uses “*heuristic cues*”, such as the identity of the source, to decide whether the pertaining information is viewed as valid or not, often regardless of the content itself (Chaiken, 1980, p. 752). In other words, once we have a certain perception of a situation or problem, we tend to seek out and put more trust into information that confirms that view. In a contentious discourse such as sex work, the rather subconscious enactment of this process can be combined with more deliberate behaviour. Utilising and sharing specific kinds of information can be an attempt to reproduce a certain “*problem perception*” among advocates as well as the general public in order to increase awareness and mobilisation of resources (Kim & Grunig, 2011, p. 122). This is done, to a certain extent, by both ‘camps’, and has been pointed out by interlocutors as criticism of one-sidedness and ill-informed argumentation.

Free Choice and Agency

“Even us professionals. If we hear they say they’re proud of what they do, we still question it. You wouldn’t do that with teachers. [...] We question it a lot and say ‘Are they really happy?’. But it might just be the case. Why is it so difficult for stakeholders to accept that?”

Social Welfare Professional, interview 13.9.2022

Agustin identifies one of the central frameworks guiding people’s information selection and thus positionality in the sex work discourse as differing moralities about agency:

“The conflicts in ‘prostitution’ debates hinge crucially on whether poor people, migrants, women can be said to have any control over their lives, given the unjust structures of patriarchy, globalisation and capitalism they live in”.

(Agustin, 2008, p. 183)

This also seems to be the case for the context of Malta, where the predominant paradigms have not necessarily opposed but differing views on the concept of agency: Decriminalisation supporters, on the one hand, generally views those engaged in the sex industry as able to make the voluntary decision for themselves to take part in it, and aims at empowering them to do so, for example by recognising sex work as work. Nordic Model proponents, on the other hand,

generally tend to want to empower them to make decisions too, but do not necessarily condone the choice of being a sex worker as voluntary or free. These differing views about agency are not emergent from or isolated within the sex work discourse itself, but are directly tied to dominant perspectives on sex and sexuality. In Malta, those are taboo topics not to be talked about publicly or openly. Influenced by the stronghold the church and Catholic values still have on Maltese society, sex is very closely related to shame and stigma. Nevertheless, things are changing and there are many professionals, activists and citizens alike who are speaking up and advocating for the destigmatisation of sex. There is a prominent feminist community in Malta, many of whose members can be found in the discourse about sex work. However, their ideas and understanding of feminism differ vastly and result in their position on opposing sides of this debate. Even though this is not always in relation to the actual age of the advocates, there seems to be a generational divide among the feminist community causing this demarcation on the subject of sex work. The Nordic Model, for example, has been critiqued to be “*stuck in the 80s*” by some activists, which implies their supposedly outdated values in regard to gender equality. In fact, the prominent paradigms can be roughly aligned with two ideological developments in feminism: The Nordic Model’s values are more closely aligned with those of second-wave feminism, prevalent in the 1960-80s, while Decriminalisation is more in line with the third-wave that emerged in the 1990s. Although the conceptualisation of “waves” suggests a temporal and historical succession of paradigms, they are in truth simultaneous and mutually influential: Third-wave feminism emerged as a critique of second-wave feminism and is positioning itself not after, but against it (Mann & Hoffman 2005:57). Interestingly, this development is mirrored within the sex work debate in Malta: During the public consultation process in 2019, the Decriminalisation group emerged at least partly as a reaction to the already more institutionalised Nordic Model coalition. As mentioned previously, groupings corresponding to prevalent policy models are not monolithic, but entail a range of nuanced and differing opinions. Nevertheless, analysing them through the lens of feminist waves appears to be constructive in understanding the fundamental disputes and opposing nature of the debate.

Decriminalisation in Malta: Empowerment and the Dilemma of Self-Identification

Local proponents generally view Decriminalisation (i.e. the decriminalisation of all individuals involved in commercial sex and lifting of all sex work related laws) as the more progressive option, presenting at the same time a broader and supposedly more nuanced perspective. It is not a coincidence that the main advocates come from backgrounds of working primarily in the

fields of migration and LGBTQI+ matters. Among the emergent perspectives characterising third-wave feminism, intersectionality¹⁵ is one of them (Mann & Huffman, 2005). Although factors affecting multiple forms of oppression, such as ethnicity, class, and sexuality, had been a fundamental part of feminist discourse before the third wave, they were often seen as separate or put into a hierarchical order (ibid.). Intersectionality developed as an alternative to this additive approach, thought to be more grounded in the reality of the simultaneous interplay of these factors based on the lived experiences of the Black feminists and scholars that developed this concept (King, 1988). Similarly, Decriminalisation advocates often feel the views of Nordic Model supporters are too generalising and excluded the realities of migrant and queer sex workers. The movement for the rights of sex workers is historically closely linked with LGBTQ+ and especially trans rights and are thus argued to not be separable from each other (Chateauvert, 2015).

Nevertheless, this emphasis on the lived experiences of specific communities is also a common criticism Decriminalisation is confronted with: Highlighting the situations of subsections of the sex industry and advocating for their needs could be harmful to those of the majority, as highlighted in the quote by Maria Borg Pellicano above. This accusation is most often made in the context of Decriminalisation's aim to orientate policymaking towards those in positions of privilege who make the voluntary and conscious decision to do sex work. The currently available local data suggests, however, that this does not reflect the situation of most people engaged in the sex industry in Malta¹⁶. Having said this, the validity of existing research can be questioned due to heightened selectivity in participants and sources of data, both primarily including Maltese individuals and those engaged in the industry that are already part of the legal system due to other offences (I will go more into detail about this in Chapter 4). Either way, intersectionality's close relation with identity politics and Decriminalisation's effort to clearly differentiate between trafficking and sex work lead to the policy model's main beneficiaries being those recognised as sex workers. Advocating for their rights and wellbeing hence goes hand in hand with acknowledging sex work as legitimate labour and source of income (George et al., 2010). However, seeking to empower sex workers as a whole through systemic change as well as their inclusion in the discourse falls into the dilemma of self-identification: The

¹⁵ I will discuss this concept and its meaning for the project and debate in more detail in Chapter 3.

¹⁶ See for example (Cauchi, 2015; Mallia, 2004; Micallef, 2019)

prerequisite to benefitting from some of these measures is to affiliate oneself with the identity of being a sex worker. But as Agustin (2008, p. 158) puts it:

“While empower-ers want to valorise cultural and individual differences and give voice to the mute, if those to be empowered do not think of themselves that way then the empowerment project cannot succeed and may turn into an unwanted imposition.”

Although most of the intended changes are meant to benefit everyone in the sex industry regardless of if or to what extent they identify with being part of it, in practice self-identification (or lack thereof) might pose an additional challenge for making use of these potential measures and services. The Sex Work Program by Agenzija Appogg is an exemplary case of that: After being founded in 2021, outreach to potential service users is still a challenge. The explicit name of the program as well as the hesitancy to (publicly) self-identify as a sex worker have been acknowledged as the main issues¹⁷. Reaching out to potential service users thus hinges upon navigating the fine line between using engagement in commercial sex as a relevant identifier and imposing a possibly undesirable or even harmful label on them.

Comparatively, while Dar Hosea is equally as explicit about their target group, for example on their website, they attempt to create a space where self-identification is not the (assumed) prerequisite to access. Service users find out about them either through their outreach activities in prison, word of mouth or through referrals by other institutions. Thus the target group is most likely clear to those reaching out while at the same time there is the sense of “no questions asked” in the drop-in centre¹⁸. Some women who approach them are still hesitant to come by the centre because they do not (want to) identify themselves as “*someone in prostitution*”. In their minds, visiting the drop-in centre would be accepting seeing themselves and being seen as such, “*just by knocking on the door*”¹⁹. Therefore, they also meet with clients outside of their space, like in a café, to respect their boundaries in wanting to maintain some distance to the association with the organisation and their service users. So, although Decriminalisation ascribes sex workers a high level of agency, there is the underlying assumption that people, as long as they have the chance and systems in place for it, will identify as such and make

¹⁷ Social Welfare Professional, interview 13.9.2022.

¹⁸ I am, however, not aware to what extent their engagement in sex work is part of the assessment meetings with the social workers.

¹⁹ Maria Borg Pellicano, interview 16.8.2022

constructive choices for themselves. This idealised view, however, does not seem to necessarily be consistent with the reality of sex workers in Malta.

The Nordic Model in Malta: Sex Work as a Women's Rights Issue

Supporters of the Nordic Model (i.e. the decriminalisation of sex workers themselves but criminalisation of buyers or facilitators of commercial sex) first and foremost view sex work as a women's rights issue. Commercial sex is often equated with violence and exploitation and "women selling their bodies" is thought to deepen their sexualisation and objectification and thereby gender inequality (CATWA, 2017; Raymond, 2004). As mentioned previously, some of the sentiments of the Nordic Model seems to emerge from second-wave feminist perspectives. Therefore, one of the main criticisms of both paradigms is an underlying presumption of a shared essence of being a woman:

"By and large within the women's movement today, white women focus upon their oppression as women and ignore differences of race, sexual preference, class, and age. There is a pretense to a homogeneity of experience covered by the word sisterhood that does not in fact exist." (Lorde, 2000, p. 289)

Nordic Model supporters ground their activism and solidarity in a similar rhetoric: Sex work is viewed as an act of violence against women, with women - not necessarily sex workers - as their main subject(s) of protection. Their engagement is thus based on a perceptual connection to the topic, i.e. the framing of sex work as an issue of women's rights. Although direct personal connection with a given issue can be an important trigger of a problem perception (as discussed previously), the *felt* affiliation with it is what determines one's level of involvement (Kim & Grunig, 2011). The sex industry, to the Nordic Model proponents, constitutes an extension of the patriarchy and men's unjust dominance of women by profiting off the objectification, commercialisation, and control of their bodies (George et al., 2010). The fight to abolish the industry is therefore viewed as an important step towards fostering gender equality, reflected in the more recently used title of Equality Model (World Without Exploitation, 2019).

Consequently, Decriminalisation poses a threat to this undertaking by signalling that the abuse and exploitation thought to be inherent in the industry are acceptable:

"[Neo-abolitionists] oppose legalisation because they believe the disappearance of legal barriers will remove the social and ethical barriers to treating women as sexual

commodities and serve as a magnet for increased sex trafficking.”

(George et al., 2010, p. 67)

The existence of sex workers of other genders has been acknowledged in most of the conversations I had with local stakeholders and advocates, although usually in passing or as a quick add-on. Still, most if not all services, advocacy, and research focus almost exclusively on (cis) female sex workers. The general lack of services and spaces designed for men, trans people, and other gender identities in the industry leads to an implicit denial of their existence and struggles, adding another layer to the interlaced experiences of (structural) discrimination. Although it is generally acknowledged by many scholars and advocates that cisgender women make up the biggest proportion of the sex industry (Vandepitte et al., 2006), the Nordic Model’s framing of it is often criticised for its use of a victimising narrative: Men are perpetrators - if as clients, pimps, or just condoning the existence of sex work – and women are their victims. Although this framing was not as present when it came to individual cases or in the practice of social workers (at least as far as I could tell), it was one of the dominant arguments guiding their advocacy work (Association for Equality, 2017). This narrative puts the agency, even if inadvertently, solely on the men while portraying the women (i.e. sex workers) as victims of their circumstances. Even in situations of trafficking or exploitation, this binary categorisation of victim versus perpetrator assumes a static and stable positionality of the persons in question (Andrijasevic, 2010). Reality, however, is often different: One person can take on both seemingly contradictory roles in different situations or spheres of their life. Women can be pimps and exploit other women, and men can be at the receiving end of victimising behaviour. Nevertheless, much of the narrative revolves around actively stigmatising men’s choice of searching out sexual services as well as questioning women’s choice of being engaged in them in the first place:

“We are putting the responsibility not on the women, but on the men who are actually using the services. Because we believe that when there is this imbalanced relationship, and exchange of money between a guy who wants to engage in prostitution, and a woman, who for several reasons- We believe most of the time it is a coerced decision, rather than an informed decision, that she's accepting to be involved in prostitution.”

(Maria Borg Pellicano, Dar Hosea, interview 16.8.2022)

Women, accordingly, are denied the ability of agency in most areas of their lives (politics, health, finances, ...) with their entry into sex work. It is viewed as an indicator of marginalising circumstances and an illegitimate approach to deal with them. Scicluna and Clark (2019) identify what they call “*victimisation trajectories*” that lead to women in Malta ending up in the sex trade: Early victimisation experiences, for example in childhood, creating the breeding ground for addiction, and coercion mainly by male partners to engage in commercial sex. In their framework, sex work is characterised by violence and based on a “*victim identity*” as well as a financial need to sustain addiction:

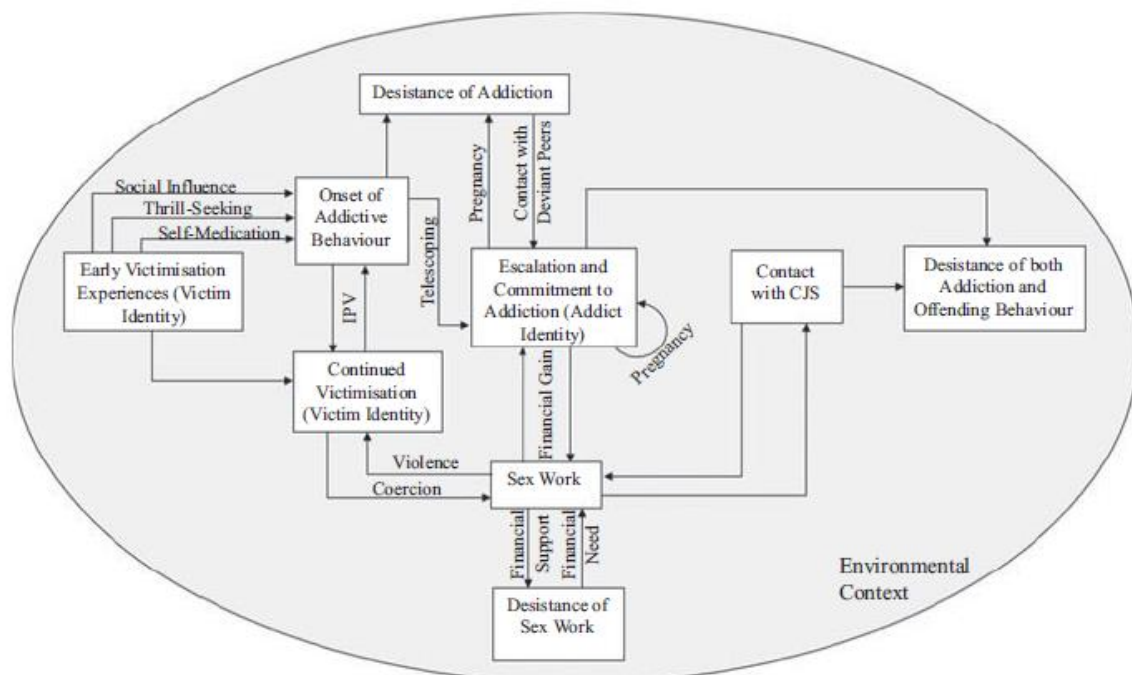


Figure 5: Diagrammatic representation of victimisation and addiction careers of women (Scicluna and Clark, 2019 p. 74)

Conceptualisations like this in conjunction with more discursive portrayals construct a normative narrative of victimhood and suggest a greatly limited frame of agency for those engaged in commercial sex (Andrijasevic, 2010). Both Decriminalisation and Nordic Model advocacy groups acknowledge that individual’s circumstances affect what options (they think) are available to them and how likely they are to make use of them (Platt et al., 2018). In this context, the concept of free choice is commonly brought up as a point of contention: On one hand, proponents of the Nordic Model do not directly criticise or blame people for their choice to enter or stay within the sex industry – in that regard the two sides generally agree. But on the

other hand, some Nordic Model supporters question the legitimacy of the choice because of circumstantial factors:

“This is where we need to focus our energy, in giving real choices for women because prostitution very often is the last resort, the last choice, a desperate choice. And the desperate choice is not really a choice. It's a constrained choice.”

(Anna Borg, Association 4 Equality & UM, interview 25.8.2022)

Following this reasoning, one's fundamental agency decreases as marginalising circumstances increase, i.e. the less choices you seem to have, the less able you will be to make a 'right' decision at all. This perspective seems to inflate two connected but not causal factors: the range of options one has, and the ability to make a choice. Agustin (2008, p. 183) defines agency as *“the ability to make decisions and act, to determine what happens to some extent, even in highly structured and restrictive situations”*. Decriminalisation tends to retain this definition by awarding every person, even those in the most precarious situations, the same inherent capability of agency. The Nordic Model, by contrast, understands agency as more situational. The latter, then, judges the validity of a choice by the conditions in which it was made. This can result in a somewhat patronising narrative employing the trope of *“false consciousness”* (Huschke, 2017, p. 195): The 'wrong' choice of entering or engaging in sex work is explained by the person being unaware of the potential harm, normalising it due to their precarious and constrained situation or as a coping strategy. This idea of *“she just doesn't know any better”* is sometimes expressed when the decision or its outcome is considered as not desirable. Not desirable, in this case mostly means *“not in her/the person's own best interest”* and usually stems, as previously mentioned, from a point of compassion and perceiving sex work as an actual threat to the wellbeing of the person in question. Utilising stories of abuse and exploitation as proof for this line of argumentation and cause for their advocacy leads to suffering becoming the foundational pillar of the Nordic Model (Doezema, 2001). Culminating in what Brown (1995, p. 27) calls *“politics of resentment”*, whereby arguments based on what is *“morally right”* take the central stage, hence solidifying the *“identity of the injured”*. Highlighting one of the fundamental differences between the Nordic Model and Decriminalisation, the respective paradigms vary in the extent to which they locate sex workers' agency and what is *“good, just and right”* in identity-based notions of who they think sex workers are (exploited, coerced, marginalised) versus solution-based notions of what they would want for them (empowerment, rights, choice) (Brown, 1995, p. 75). The discursive

dependency on suffering, although aiming to promote the voices of sex workers' in situations of exploitation, practically suppresses any nuances of their lived experiences, and actively constitutes them as voiceless victims: "*The image of the prostitute put forward [...] is therefore that of a wounded woman who has no voice and whose injured body speaks for her.*" (Andrijasevic, 2010, p. 15). While Decriminalisation somewhat presupposes a certain level of self-identification as a sex worker to gain access to support and resources, the Nordic Model does so with experiences of exploitation and suffering. Both hinge upon prevalent notions of agency and choice that are putting specific kinds of sex workers in the foreground whilst neglecting the other lived experiences in their advocacy.

Even though portraying sex work as a women's rights and gender equality issue has its validity, resorting to victimising narratives does not, in fact, constructively combat patriarchal structures, but can result in (re)confirming them. Similarly, framing men as a whole as inherently violent and oppressive beings further deepens the rift that certain feminist movements have created whereby men are expected to support feminist efforts while being excluded from them. The fight against patriarchy can only be successful in the long run if we work together and not only include men as supportive bystanders from the sidelines but by creating a space for them to take an active role in educating other people and fighting for change. Furthermore, advocates implicitly or explicitly denying sex workers' agency and instrumentalising patronising narratives only further emphasise stigma and degradation of the very people they aim to protect.

In this chapter, three prominent reasons for interlocutors' engagement within the public sex work discourse were explored: Professional obligation and activism, personal emotional connection and morality as well as feminist paradigms and ideologically-informed positionalities. It was discussed how factors such as social structure, personal experience, and notions of agency inform individual's interest and level of involvement, and how this is further shaping the discourse in Malta and its binarity and polarisation. While there is not much formal knowledge on the demographics of sex workers in the country, migrants are assumed to make up a significant proportion as based on data from other countries within Europe. In the next chapter, I will discuss the importance of an intersectional approach before examining current phenomena in Malta concerning migration as well as the local landscape of the sex industry.

Chapter 3: Hidden in Plain Sight.

Migratory Projects and the Sex Industry in Malta

“When Fajsal stopped shovelling sand into the cart, [...] he paused and had a look around. And he was not liking how things were playing out. In a matter of a week, from eight the amount of workers had went up to at least twenty. There were Kurdish, Tunisian, Senegalese and about three Egyptian like him: All of them are illegal immigrants, ready to do whatever comes their way as long as they make enough money to cross Malta and Sicily. Their work on the twenty apartments in the block was almost done. [...] During the three months that he knew him, every Friday afternoon, when their pay time was approaching, the boss’ jaw fell to the ground; as if with the money he was giving away his soul, even though who knows how much more expensive it would have been if he paid Maltese workers. [...] After a while [one of the workers] popped up, waving his hands and screaming that the police were spotted. The workers ran away, jumped the rubble walls and made their way through the fields that were empty except for some dry plants and cacti. Fajsal could feel the hot terrain, small rocks and spikes under his footsteps. He left his sandals behind, but he kept running until the apartment block was no longer visible. [...] A week’s work gone to waste! Neither he nor the others were going to go back to that construction site. Who were the police that raided the block, he wondered. Who knows? This is not the first time Fajsal heard of this happening. Whatever it was, he couldn’t do anything about it.”

Bl-Irħis (eng. “Cheap”) – A short story by Vince Vella (2006)²⁰

The initial research question that guided this project was *“What challenges do migrant sex workers in Malta face in accessing health care services and knowledge?”*. The focus on migratory realities emerged partly from previous academic and personal engagement with related themes, and partly from the localised manifestation of ongoing increased migratory flows in Malta over the last few decades. Once you step foot on the island, it is nearly impossible to ignore this reality: Every construction site is staffed with workers from predominantly African countries and the vast majority of food delivery drivers who have quickly become a permanent feature of the Maltese cityscape are from South-East Asia. Immigrant labour is omnipresent. Having decided on the topic of sex work, then, the question about the non-Maltese

²⁰ Translated into English by Edward Abela (2022).

population seemed apt, as migrant sex workers in most European countries are thought to constitute a significant proportion of the industry (TAMPEP, 2009). Particularly in a country like Malta with a notable geopolitical position and historical background of migration, this delimitation seemed not only logical but important. Although there is little official data on the demographics within the sex industry in Malta, non-Maltese people are thought of making up a considerable part of it: Asian women seen in massage parlours through small gaps of the doors that usually remain closed (and locked), Eastern European women in front of Gentlemen's Clubs in Paceville promoting the establishment and trying to lure potential customers in, the prevalence of South-American men on escort websites, etc. And these are only the more visible domains. While the existence of Maltese sex workers is undeniable, focusing only on them in this enquiry would neglect a significant proportion of sex workers and the needs and challenges specific to them. Furthermore, deliberately including migrant sex workers also shifts the focus on systemic issues and marginalisation of non-Maltese people and third-country nationals in particular.

Before diving into the challenges that exist in accessing and providing health care and other services for migrant sex workers, the concept of intersectionality will be discussed as it was central in guiding enquiry. Then, a brief overview of the situation concerning migration in Malta will be given in order to contextualise the existing challenges within historical and more contemporary developments. Lastly, challenges for sex workers, as identified by stakeholders, and challenges for stakeholders themselves will be examined.

Intersectionality: Sex Work is not a “single-issue fight”

As anthropologists, we are trained to navigate the diversity of experiences, perspectives, and realities inherent in human life without reverting to generalisations and supposed objective truths. Aiming to understand behaviours and sense-making processes within their localised historical, social, cultural, political, and geographical context is a central part of that. This paradigm of cultural relativism is thus a guiding force in anthropological enquiry. We are, however, not alone in this. Other disciplines and non-academic movements have identified a similar need for contextualisation and nuance to approach lived realities from a point of representation and understanding rather than putative unity. One of these approaches is intersectionality.

At its core, intersectionality highlights how various facets of identity within a given societal and systemic context form a complex interplay of privilege, oppression, and lived experience. It is a theoretical concept that emerged from Critical Race Theory and was coined by Kimberle Crenshaw in 1989. Originally intended to analyse and point out flaws in anti-discrimination law, it has been revitalised by third-wave feminism (Mann & Huffman, 2005). Feminism and other social movements, such as for disability and queer rights, found the concept to be valuable for providing an analytical framework that is more adapted to their lived realities (Fuentes, 2023). Even though the presence of multiple modes of marginalisation existing at the same time and affecting an individual in different ways has been acknowledged previously, most conceptualisations drew on a simplified understanding of this matter. Multiple oppressions were viewed as distinct in their character and manifestation, thereby assuming that even if two or more are present in a given situation (for example being a woman and being Black), one can usually be determined as the primary source of oppression. Consequently, facets of identity in this paradigm are interpreted as separate at their root and enacted within a situational hierarchy (Mann & Huffman, 2005). Thus, one component of an individual's identity is highlighted and put in the foreground, while others are neglected in sense-making of a given situation of marginalisation. These so-called additive approaches function based on the assumption of "*subordination as disadvantage occurring along a single categorical axis*" (Crenshaw, 1989, p. 140). They were common within previous feminist paradigms, emphasising one specific mode of oppression, namely being a woman (Lorde, 2000). More contemporary understandings of intersectionality based on Crenshaw's (1989) conceptualisation critique this perspective as distorting reality and simplifying overlapping structures of domination (Carastathis, 2014; Christoffersen & Emejulu, 2023). Arguing that it is not sufficient to analyse lived experiences of oppression as contingent on one distinct feature of (social) identity based on the premise that, as Crenshaw (1989, p. 140) says, "*the intersectional experience is greater than the sum*" of its parts. Instead, it is made up of mutually reinforcing mechanisms of subordination that cannot be separated from each other (Collins & Bilge, 2016). To visualise this, Palczewski et al. (2019) suggest the comparison of thinking of identity as a cake made up of several ingredients instead of a beaded necklace (reminiscent of the additive approach). Both constitute a whole self, but while the necklace can be broken down into its distinct and divisible parts, it is impossible to separate the ingredients of a finished cake. Just as one mode of oppression cannot be isolated and separated from others in any effective capacity. Furthermore, the underlying assumption of a more or less uniform experience based on a shared marker of identity is flawed. Although

belonging to or being associated with a specific community or group can produce “*corresponding partial perspectives [and] situated knowledges*”, they do not share a singular homogenous version of reality (Collins, 1998, p. 234). There is no all-encompassing collective experience of being a woman, a person of colour, queer, disabled or any other group of people, however similar their experiences may seem to outsiders.

Nevertheless, instrumentalising unity or picking out certain issues that are affecting a disproportionate amount of people from a given group in some ways can be constructive for mobilisation and positive change (Collins, 2008). Even so, advocacy is often guided by the experiences of the most privileged and neglect or even further marginalise those that are “*multiply-burdened*” (Crenshaw, 1989, p. 140). This is frequently the case when talking about sex work. Besides commonly being framed as a women’s rights issue, much of the advocacy is based on the needs and concerns of the more privileged and visible sex workers. Partly due to the fact that it requires certain privileges to be part of the discourse and provide insights into one’s challenges, the ambiguous differentiation between human trafficking for sexual exploitation and sex work further complicates this. Ultimately, sex work is not a “*single-issue fight*” (Fuentes, 2023, p. 226). Although changes in policy and other areas of governance are crucial, focusing on sex workers’ rights alone is not enough. Improving the wellbeing and systemic positioning of those in the sex industry necessitates further reflection and changes in other areas, first and foremost immigration law, social stigmatisation, and access to the labour market, among others (Calafato, 2018; Platt et al., 2018). After all, it is important to point out that the decriminalisation of sex workers does not eradicate structural and historical oppressions such as sexism, racism, homophobia and ableism (Lemoon, 2021). Thus, advocacy and any changes in the system have to be guided by a “*multidimensional pursuit of justice*” (Fuentes, 2023, p. 226), including diverse and nuanced understandings of the lived experiences of sex workers.

Malta: Transit Point or Trap of Disillusionment?

“No man is an island, entire of itself; Every man is a piece of the continent, a part of the main.

[...] Any man's death diminishes me, because I am involved in mankind.”

John Donne (1624)



Figure 6: *Mediterrano* by Urka (2023)

This image was posted by Italian artist Urka in February 2023²¹ with the description “*no man is an island*”, presumably a nod to the above poem by John Donne. The image was widely shared among the social media channels of Maltese activists and NGOs, all too aware of the dire situation in the Mediterranean and Malta in particular when it comes to irregular migration. The country had been criticised for its insufficient and often inhumane treatment of irregular migrants for decades (DeBono, 2012). Government officials’ defence usually hinges upon the alleged vulnerability towards immigration of the island state due to its small size (see for example Balzan, 2023). However, even though this justification cannot be fully dismissed, it quickly loses credibility when we look at the general immigration trend in Malta: The national census showed an increase of foreign nationals from 2011 of 5% to 2021 of more than 22% of the entire (documented) population, which was about 520.000 at the time (National Statistics Office Malta, 2023). Of this share, the vast majority (58%) are white and from Western

²¹ Retrieved from:

<https://www.facebook.com/urkabook/posts/pfbid02bZ1fXLT7znD3aBxYUPm31pEm5cqbctjuqgsNtiH2nNDoq8geHZ3rrULfYDBnd3yel>

(predominantly European) countries, with those from Asian countries coming second at 22%, and previous residents of African, Arab and South American countries making up about 4-6% of the non-Maltese population each (ibd.:147).

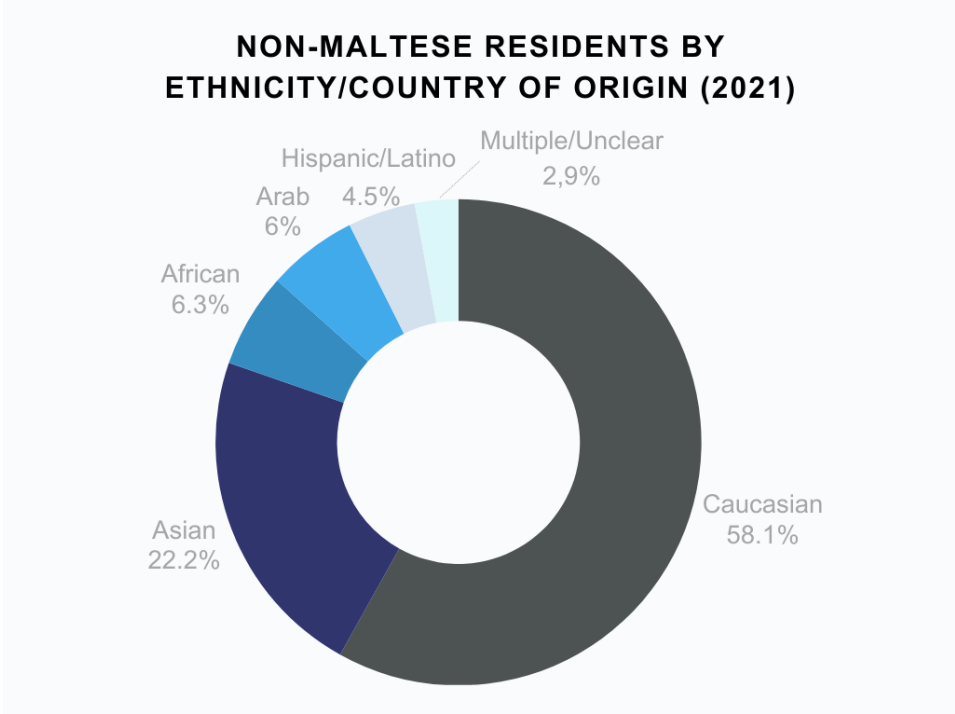


Figure 7: Non-Maltese Residents by Ethnicity/Country of Origin (based on NSO, 2023)

So how come Malta can accommodate over 115.000 immigrants with sufficient infrastructure, work, health care and other welfare while supposedly struggling to provide the same for irregular migrants that make up a fraction of that number? To compare, in 2021 Malta had about 830 people arrive through irregular means, mainly by boat from Libya and Tunisia (UNHCR, 2023). Although it can be argued that irregular migrants have different needs from other immigrants that put additional strain on the system, the Maltese government demonstrates that it does not want to alleviate this strain but exacerbates it through hostile and extreme laws and practices: Instantly detaining virtually everyone arriving irregularly, keeping them in a legal vacuum for an average of two to three years before receiving an initial decision on their asylum application (UNHCR, 2023), and in the meantime barring access to their rights, the labour market, and crucial welfare, all adds to the precarity that irregular migrants find themselves in (DeBono, 2013). On top of these structural measures, Malta is also engaging in acts of “border-necropolitics” (Khosravi, 2010, p. 27). Necro-politics refers to the ability of the state to make decisions over life and death (Mbembé, 2003). When applied to the context of national borders, the term refers to how they function not only as spaces where the state exerts control and

regulations, but where it exercises its power to dictate who is allowed to live and who is not (Khosravi, 2010). Border-necropolitics do not necessitate a direct use of violence, but can be enacted as the exposure to death through inactivity by claiming these areas and lives are out of bounds of the nation's responsibility (Rajaram & Grundy-Warr, 2004). There have been numerous reported instances of the Maltese Armed Forces remaining inactive even after receiving distress calls from boats in Malta's search and rescue zone as well as several accusations of Malta's involvement in illegal pushbacks to Libya (aditus foundation, 2023). Thereby disregarding their legal obligations and fundamental respect for human life, it is estimated that they condemned more than 8.000 people to potential death at sea or detention in Libya in 2022 alone (ibid.). Consequently, the European Center for Constitutional and Human Rights (ECCHR) and SeaWatch called on the International Criminal Court to investigate the Maltese prime minister at the time (among others) on the accusation of crimes against humanity (ECCHR, 2022). While the government repeatedly denies failure or deliberate neglect on their part, their "*willingness to tolerate casualties*" is blindingly clear (Inda, 2007, p. 149).

Precarious Work and Informal Labour

This mentality of tolerating and actively facilitating the marginalisation of non-Maltese populations is transported into policy-making with direct effects on the labour market, both regulated and unregulated. Even after receiving a decision of asylum, the (not so) implicit message of "*we don't want you here*" continues through non-EU migrants' resident permits: Once an employer fires you, you have only ten days to find new employment or you will lose your authorisation to stay in Malta and have to leave (Identity Malta, 2022). This time span is highly unrealistic, even for the most privileged and educated people. Losing your job or receiving a rejection to your asylum application are two of the common ways of becoming undocumented. Being completely dependent on the employer thereby creates a relationship characterised by dependency and opportunity for exploitation. Once released from detention with nothing but the clothes on their body, most irregular migrants make their way to the big roundabout in Marsa, where you can always see predominantly young, African men sitting in the shade on top of the railings by the side of the road, waiting for someone with work for them to stop by. Most often, this work is within construction for individual days or over longer time periods. The exploitative and dangerous circumstances in this industry, especially for irregular migrants, are well-known (Daphne Caruana Galizia Foundation, 2023; Eisenbraun, 2023). In 2021, one case received a lot of media attention whereby a man from Somalia fell and sustained

multiple injuries on site and was subsequently abandoned on a road by his (Maltese) employer who claimed to bring him to the hospital (Abela, 2021).

Although the Maltese government likes to instrumentalise a narrative of discouraging irregular migration and problematising unregulated labour markets in the country, it is in fact depending on it (Puygrenier, 2021). The boom in construction and infrastructural development over the last decade in particular probably would not have been possible without underpaid, informal workers (ibid.; Central Bank of Malta, 2019). Precarious labour, characterised by its uncertainty, exposure to exploitation and low income (Anderson, 2007; Rodgers & Rodgers, 1989), is thus not necessarily an opposing phenomenon to a nation's development and prosperity, but can go hand-in-hand with it. Therefore, it is useful to think of border regimes differently:

*“In practice rather than a tap regulating entry, immigration controls might be more usefully conceived as **constructing** certain types of workers, and facilitating certain types of employment relations, many of which are particularly suited to precarious work.”*

(Anderson, 2007, p. 2)

Many who come to Malta for a better future or thought it would be a stop-over into mainland Europe end up getting stuck on the island due to legal and structural barriers as well as poverty (Caruana & Rossi, 2021). Disillusionment further exacerbates their wellbeing, as the promise of Europe for better living and working conditions quickly turns out to be false. Portrayals of Europe, or the West in general, as a wealthy, safe, and just place are spread by inhabitants of these regions as well as by those who have completed the migratory journey (Khosravi, 2010). Both buy into the alleged superiority and desirable modernity of Western countries and culture:

“[Our clients] were being promised a new life. [...] Everyone promises it. Their families back home, smugglers, the people who come here. Because they will never admit it is so hard. [...] So everyone promises these people a better life. And then when they come here, it is a very, very harsh reality.”

(Mauro Farrugia, CEO of AWAS, interview 3.8.2022)

This harsh reality is that even if the structural conditions are in some cases more stable and effective at promoting wellbeing, benefiting from them is a privilege often reserved for citizens and ‘legal’ immigrants. This is just one of many examples of how Malta’s border regime seeps into the structures and experiences impinging on the lived realities of irregular migrants in the country.

Racism and Xenophobia in Malta

As Khosravi (2010, p. 28) puts it, “*border transgressors are seen as less human and thereby eligible for sacrifice*”, not only at the physical borders, but also in the grey zones they create within the nation as well as the social and cultural ones that seemingly divide ‘us’ from ‘them’. Similarly, Malta’s problem with xenophobia is omnipresent in the lives of irregular migrants and those put into association with them. Being discriminated against in the housing sector (Fsadni & Pisani, 2012), employment (Caruana & Rossi, 2021; Merino, 2017), and health care (Padovese et al., 2014) are just a few examples. In a study from 2017 investigating discriminatory attitudes in the country, a prevalence of xenophobic sentiments became eminently apparent: Participants’ tolerance of racist statements was significantly high, they recounted numerous instances of direct and explicit xenophobic hate speech, and 80% of all reported cases within the context of the study were in relation to ethnicity (45%) and religious belief (35%) (Assimakopoulos & Muskat, 2017). Furthermore, Malta has been ranked among the top 10 worst countries for expats multiple years in a row (InterNations, 2022). In the biggest Facebook group originally intended for expats, the phrase “*go back to your country*” (or GBTYC, for short) is frequently commented by the numerous Maltese users in the group and has become a sort of inside joke. People proudly post about having received their first “*GBTYC*” in person. One user even asking: “*So if a person of Maltese Decent/Ancestry gets told to GBTYC do we get double points??*”²².

Xenophobia does not affect every (perceived) group of people in the same way. Maltese seem to have differing perspectives with varying degrees of xenophobia dependent on how closely tied it is with racist perceptions of that individual or a group. This is what DeBono (2012, p. 272) terms a “*selectively cosmopolitan*” acceptance of foreigners which tends to exclude irregular migrants or those that are perceived to be distinct from the mainstream Maltese

²² Facebook Post, 22.9.2022, Retrieved from:
<https://www.facebook.com/groups/37543266722/posts/10158793163096723/>

population. Distinctions are made based on skin colour as well as on (assumed) religious belief and nationality, commonly reproducing the dominant image of the unwanted ‘illegal’ immigrant as a Black Muslim man from Africa. Although white and European immigrants can also face exclusion and social discrimination, it is more often along the lines of being viewed as a nuisance and in a way that might be affecting their social life but not most of the fundamental pillars of life (such as with the GBTYC ‘rite of passage’)(Sangare, 2019). Whereas immigrants of colour and especially irregular migrants are perceived as a threat for the safety and culture of the Maltese people and are confronted with more profound acts of discrimination and of (structural and interpersonal) violence. Additionally to the de facto criminalisation of irregular immigrants through hostile practices of border control and policy-making, there is a culture of criminalisation in social contexts: Exclusion of a discerned ‘Other’ informed by concepts of illegality and danger is enacted as a mode of social control, whereby those that are identified as outsiders of the local society are discursively and practically deprived of rights, solidarity, and humanity (Garland, 2002). This is reflected in the use of the phrase “*Human Rights for the Maltese first*” which had been used openly and frequently in past public discourse (DeBono, 2012, p. 269).

Postcolonialism and the Fear of Invasion

But where is this seemingly deep-rooted xenophobia coming from? One of my interlocutor’s had a rather clear explanation to offer:

“We have an inferiority complex [...] from being colonised for so long. We had always someone to look up to, we were never our own being. [...] We got our independence and 30 years later we join the EU, and the EU in itself is a modern day colonial body [...]. There’s always this higher person that we have to look up to. So, when something is different, when something looks foreign, we’re afraid of it.”

(Eman Borg, founder of LGBTI+ Gozo, interview 6.7.2023)

While the truth, as always, has multiple layers, an entrenched fear of being forcibly marginalised has been identified as a central factor for the situation in Malta. The 2017 study on hate speech found a perceived imminent threat by non-white migrants flocking to the country in high numbers to be a predominant theme (Assimakopoulos & Muskat, 2017). This persistent anxiety about (cultural) domination is not only grounded in historical fact but also in the socio-geographic make-up of the nation: As discussed previously, Malta is a small island state with a

strong sense of social control and multi-stranded relationships at the centre of a tight-knit society. Therefore, the sense of being vulnerable to external forces is informed by a strong wish to protect these internal societal structures and values (Van Hooren, 2015). As in many other places, xenophobia and islamophobia have been on the rise in the last decade, and the panic about irregular migrants and their ‘undesirable’ culture ‘taking over’ are used commonly in political and general public debate (Micallef, 2019). While in other countries the unfoundedness and racism inherent to those statements is generally quite obvious, Malta is using its small size and historical past as a shield against such accusations (Schumacher, 2020). However, as demonstrated before, the number of white Western immigrants greatly exceed those of non-white, third-country nationals and irregular immigrants. Despite this, the influx of the latter is viewed as much more problematic and dangerous due to the “us vs them” mentality having a strong hold on the Maltese national consciousness and a felt fear of invasion and domination (DeBono, 2012).

This narrative of selective xenophobia was also apparent in one of the central tourist attractions in the capital Valletta called “The Malta Experience”, consisting in part of a short documentary about the history of the country. I viewed it several months into my fieldwork when family came to visit, and was shocked by the explicitly biased portrayal: Prior occupations of the island and even the period of being colonised by the English was generally accompanied by neutral calm music, recounting the positive changes their domination has brought to the people of Malta. Once it got to the rule of the Arabs, however, there was a sudden and harsh change in tone. A slow pan out from the crescent upon a mosque underlaid with threatening music emphasising the alleged pure terror and violence their occupation has brought. That most of the 200-year period was characterised by peace²³ and that the more recent colonialist past has much more deep-seated repercussions on Maltese culture and people, is not represented in this depiction at all. Instead, it was seemingly guided by a xenophobic and racist understanding of history, framing non-white and non-European rulers as violent and dangerous, while contrasting them to the merciful and sophisticated European settlers.

The connection and easier assimilation through a supposed shared European culture can be pointed out as one explanatory factor of this selective perspective on a perceived threat of infiltration. But this argument is based on an essentialist image of Europe and Western culture

²³ See for example (Grima, 2019).

as a whole, ignoring its intricate differences and locally-specific manifestations. As discussed previously, positioning themselves in close connection to Europe is a central aspect of Malta's current national identity. Not too long ago, Maltese themselves were viewed as an Other by the rest of the Western world. Experiences of marginalisation and cultural repression are still present within the collective consciousness of the Maltese people, even if awareness decreases with each generation. After independence and especially after starting to engage in efforts to become part of the EU, a harsh cut with their previous subordinate and non-European ascribed identity needed to be made. Therefore, this supposed "*inferiority complex*" could also be conceptualised as an attempt at self-protection by (re)producing strong social boundaries through acts of non-belonging (Gershon, 2019): Clear demarcation of an in-group and out-group is instrumentalised in creating a seemingly firm line of non-association with the latter, achieved through acts of (social) exclusion and discrimination. This is often expressed through acts of domination, aggression, or overestimation of the self. In simple terms: We put others down to make ourselves look and feel better (than them). As Van Hooren (2015, p. 81) puts it: "[...] *Certain types of people get stigmatized so that the mainstream society can thereby decide who they are and what they belong to*". Arguing that this concept is not only suitable for individual and inter-personal relations, Malta's contemporary xenophobic and racist attitude could thus be illustrated as a collective and cultural coping mechanism of experiencing colonisation and oppression in the previous century. And the Maltese made the evident decision to belong to white mainland Europe, and not continue to be a nation of Othered people on the shores of Africa.

The Sex Industry in Malta: An Outline

Finally then, who is part of the sex industry in Malta? And where are they? This is not an easy question to answer. There is a significant lack of sufficient and reliable data on this subject, and most of what is known is based on individual experiences or the limited insights service providers attain (for example Rossoni et al., 2022). Nevertheless, I will lay out a handful of scenarios that have been identified to demonstrate the diversity of circumstances relating to commercial sex, thus attempting to provide a possible outline of the sex industry in Malta. This characterisation is by no means exhaustive or determinative of individuals' lived realities. It is primarily based on interviews with interlocutors, media coverage and the few existing studies. Another important aspect to point out is that I acknowledge the existence of men, transwomen and people of other gender identities within the sex industry. But as my project and the

conversations I had ended up primarily focusing on cisgender women, I do not feel comfortable making claims about it without any basis in the context of Malta. The omission of men and other gender identities is thereby in no way ideologically informed, but emergent from a limitation of the project itself, highlighting again the strongly gendered nature of the discourse that neglects the inclusion and rights of queer and non-cisgender people.

Over the last few decades, Malta has become a central hotspot for tourism in the Mediterranean. Today, tourism makes up about 40% of the island state's GDP and they welcome around one million tourists every year (Van Hooren, 2015). This immense influx of people consequently also increases the potential client base for local sex workers. Maltese sex workers can increase their income during the summer months this way as some of them prefer to only take on non-local clients for reasons of anonymity (Giardina, 2022) additionally to tourists also often being more likely to pay higher rates (Rivers-Moore, 2012). These and other reasons lead to sex workers from other countries coming to Malta for varying periods of time to work there before either returning to their country of residence or moving on to another place. Presumably, most of the individuals engaged in what can be called seasonal or migratory sex work (Rocha et al., 2022) enter the country or Schengen area legally, for example on a tourist visa or work visa, and subsequently pursue work informally²⁴. Once in Malta, there are different and not necessarily mutually exclusive paths one might take. Those coming to the country with the intent to engage in sex work generally do so informally and independently. Promoting their services on one of the numerous escort websites, dating apps or through other digital channels is common among certain demographics. Looking through these platforms, one can identify a trend of women from Eastern Europe as well as from South America, with a high prevalence of South American men too. If self-employed, work is likely conducted in private accommodation or in hotels. Multiple sex workers living together in an apartment and working there is a common strategy with advantages in terms of safety and decreased expenses, among other factors²⁵. However, as previously discussed, even though sex work itself is not criminalised in Malta, there is factually no safe and legal way to carry it out, as sharing premises for the purpose of sex work is recognised by law as running an illegal brothel (White Slave Traffic (Suppression) Ordinance, 2008). In 2022, one case of four women from Colombia was widely reported on in the media. Tipped off by neighbours, their apartment was under surveillance and

²⁴ Officer from the Immigration Section, interview 19.8.2022

²⁵ NGO Representative, LEFÖ, interview 14.6.2022

eventually raided by police who “*came across items related to prostitution*” (Brincat, 2022). All four women were sentenced to over a year in jail and were subsequently deported. A prime example of the legal system disregarding the agency, safety, and realities of migrant sex workers.



Figure 8: Paceville, Malta
(Photo by atravelerhasnname, 2019)

For these reasons, some end up working in more seemingly regulated premises, such as so-called Gentlemen’s Clubs in the party district Paceville. Officially only licensed as night clubs with erotic dancing, it is widely known that other forms of sex work are offered there. At night, you can see women of varying ages dressed in seemingly comfortable but partially revealing clothes in front of some of these establishments, handing out cards to passersbys. Their casual appearance makes them blend in with the crowd of hundreds (if not thousands) of people roaming the streets filled with loud music looking for their next drink, which also makes it easier for them to approach and be approached. The entrance of some clubs is brightly lit and nicely adorned with decorations, and guarded by serious-looking bouncers, at the same time enticing people to enter and intimidating them by making clear not everyone is allowed to come in. Working conditions and payment vary widely by club. Reportedly, a share of them are recruited by agents in their countries of origin, seemingly predominantly so in Eastern Europe (Cilia, 2018). Relations of dependence with these agents or club management, for example due to visa and work permits, can lead to situations of unfair payment or exploitation, prompting some sex workers to prefer working independently (Goldenberg et al., 2018).

When talking about the sex industry in Malta, one has to talk about massage parlours. While Gentlemen' Clubs are comparatively few and spatially contained primarily within Paceville, massage parlours can be found all over the island in high numbers. Although ubiquitous, they are easy to overlook during the day due to their usually quite plain exterior as well as covered windows and doors. Until 2016, massage parlours had to be registered and



Figure 9: Massage Parlour in Birkirkara, Malta (28.10.2022)

licensed with the Department of Economy, Investment and Small Business, but this procedure was discontinued for unknown reasons (Galea, 2018). Although not the case for all of them, it is an open secret that massage parlours are more often than not overt brothels (Times of Malta, 2019). In an extensive post about his experience in Malta, with reviews about all the establishments he visited, one sex tourist shared how one can generally differentiate which parlours do “extras” (i.e. sexual services) by identifying whether they are Chinese parlours or not (UKPunting, 2020). His finding is in line with reports that locate possible instances of human trafficking in massage parlours with mainly Chinese individuals (Rossoni et al., 2022). Often coming to Malta under the pretence of different employment, Chinese and other Asian women end up being trapped in these parlours. Factors like unfamiliarity with their surroundings, inability to speak and understand English, and living in the parlour or with the owner (often under inhumane conditions) all add to the precarity of their situation (Rossoni et al., 2022). Instances of passports being taken by the owner as well as them not being allowed to leave the premises without someone accompanying them have also been reported (Times of Malta, 2020). What is known is primarily based on media coverage or data collected by health care providers such as the GU Clinic that have had contact with individuals due to (contact tracing of) sexually transmitted infections. The Maltese government’s shortcomings in regulating massage parlours and other loci of trafficking has been repeatedly pointed out in the U.S. Embassy’s annual Trafficking in Persons Report (2021, 2022, 2023). Another present circumstance of relocating to Malta under false pretences are women from Southeast Asian

countries coming to be employed as domestic workers in private households. Most of them enter with a formal work permit (Muscat, 2021) but end up being trapped within arrangements based on isolation and dependency on the employer and are thereby at risk of exploitation and abuse (OHCHR, 2015). In some cases, this takes the form of sexual assault or exploitation for commercial sex (Abela, 2019; Bugre, 2012).

Talking about irregular migrants from Africa, some stakeholders wonder “*Where are they?*”. One representative of an organisation that is offering support to many people with a migratory background shared their experience of a planned outreach project for sex workers:

“We were surprised not to find many of our clients, in a sense. Our client base are so many West Africans, for example. There were none, which is really surprising.”

(NGO Representative, interview 1.8.2022)

Their absence on online platforms and within the previously mentioned known establishments leave many advocates and service providers wondering where people from this group are carrying out sex work. One might argue that there is the possibility of (close to) none of them being engaged in commercial sex. This, however, seems to not be the case. Instead, irregular migrant sex workers might be more likely to move and work within community-based and highly informal networks due to a lack of resources and opportunities to work within the previously mentioned spaces. One interlocutor shared insights whereby information about known sex workers within the community (usually based on nationality) is shared between (potential) clients through word of mouth, and that sometimes sex workers even refer their clients to each other²⁶. Furthermore, poverty, non-access to the regulated labour market, and flexibility due to childcare were mentioned as factors prompting individuals to become engaged in commercial sex. However, informal community-based sex work brings with it its own challenges and benefits, for example regarding safety, anonymity, or risk of abuse.

As in many other countries, street work has decreased significantly since the Covid-19 pandemic as many sex workers moved indoors or transitioned to online spaces (Nelson et al., 2020). Before, places like Albert Town in Marsa, Ta’Xbiex and Gżira were well known spots for street-based sex work, as stated by numerous interlocutors. This move to other and predominantly interior locations has made outreach significantly more challenging. As stated

²⁶ NGO Representative, interview 11.7.2023

in the beginning, little formal knowledge exists about the situation in Malta and most of this outline is based on stakeholders' insights and assumptions. Nevertheless, it can be said that there is an immensely diverse range of sectors, circumstances and lived realities inhabited and experienced by persons engaged in commercial sex in the country. This short outline of the local landscape aimed to provide an introductory overview serving as contextual background for the specific challenges faced by sex workers and service providers discussed next.

Chapter 4: Access Denied.

Challenges to Accessing & Providing Health Care Services in Malta

“Disease only treats humans equally when our social orders treat humans equally.”

John Green (2021)

Although intended more as a point of departure than strict thematic perimeter, health care was at the centre of this study. The focus emerged out of previous exploration of the subject, academically and privately. Voluntary engagement with refugees in Austria from 2015, conducting research with migrant women and how they create their new lives through subtle acts of agency and emancipation, as well as partaking in a summer school on Lampedusa in 2021 on irregular migration all highlighted the importance of health care in people’s lives. While legal barriers and other various impacts of strict border regimes permeate non-citizens’ lives in many ways, I identified health care as a field with more potential for imminent positive change. Although intertwined with structural frameworks, health care is often facilitated or fully provided by non-governmental stakeholders where state structures are non-sufficient or not accessible for certain groups (Bradby et al., 2015). Particularly in situations of crisis and irregularity, the provision of services is established reactively, a task more suitable to NGOs with less extensive internal processes or specialised adaption to these scenarios (ibid.). Therefore, although ongoing long-term provision through them is challenging, they play a crucial role in promoting the wellbeing of migrants. NGOs’ shorter reaction times as well as heightened expertise of working “on the ground” directly with beneficiaries thus can be thought of possessing an increased capacity for actionable change. Furthermore, whether provided through state institutions or NGOs, health care is at its core always an encounter between people. This personal character stands in harsh contrast to fields like law or even border control, which generally function within different, less relational modes of inter-personal encounters. As the term already implies, caregiving is a fundamental element of health care. It is frequently part of the core motivation of professionals working in the field, wishing to decrease suffering and facilitate the wellbeing of patients (Kleinman, 2012). Nevertheless, this entanglement of professional positionality with personal dispositions such as morality and other values, brings with it its own set of challenges. If by virtue of the sector or the broader conversation about science in the West, social and cultural aspects as well as critical self-reflection are systemically

neglected despite being a central component of successful and reliable service provision. These and other problems hinder the cultivation of a doctor-patient relationship that is based on mutual understanding and acknowledgment of more personal needs outside of basic health (Kleinman, 2011). This direct impact of a person's subjectivity in health encounters is both challenge and advantage at once. Misunderstandings are commonly a result of misconceptions and a lack of insight into the patient's lived reality outside of imminent health needs, and not a lack of willingness on the medical professional's part (Phillimore, 2014). Consequently, establishing interventions on the individual level, such as cultural competency courses for service providers or information sessions for service users, can have an almost instantaneous positive effect on the efficacy of health care provision (Griner & Smith, 2006). Lastly, the thematic focus was chosen due to migrant sex workers inhabiting a positionality with multiple intersecting modes of marginalisation that can complicate or even hinder access to health care. As discussed previously, Malta's hostile border regime permeates all areas of non-citizens' lives, especially irregular migrants. Exposure to discrimination and violence as well as sub-standard living conditions decrease their mental and physical wellbeing (Padovese et al., 2014). Additionally, Platt et al. (2018) in a meta-analysis of existing research on law and sex worker's health have found a significant impact of repressive policing of sex work and adverse health outcomes. The de-facto illegalisation of sex work present in Malta coupled with intense stigmatisation grounded in conservative and Catholic values further reinforces hesitancy to make use of services and thereby increases health risks. Faced with this challenge, I will now explore a selection of identified barriers to accessing health care services for migrant sex workers in Malta, followed by challenges faced by stakeholders in providing these services. The vast majority of identified issues can also be extended to other sectors and types of services.

Challenges for Migrant(s and) Sex Workers

As previously stated, due to difficulties with access and scope as well as ethical considerations, sex workers themselves were ultimately not part of this study. Instead, the focus shifted predominantly to stakeholders from related fields, such as health care, migration, policy making, and women's rights. Conversations revolved around interlocutors' insights into the situation in Malta regarding sex work, migration, and health care. The following challenges and themes are thus based on stakeholders' perspectives and understandings. Insights by service providers with first-hand experience were given priority in this analysis, yet they are still embedded in their respective positionalities and personal sentiments. Consequently, the

following identified challenges are solely based on their perceptions and assessments. The omission of sex workers' and migrants' perspectives could be the focus of a separate additional study, exploring what challenges might exist and how they are navigated. Nonetheless, centring stakeholders' views can be worthwhile for investigating what (mis)understandings, assumptions, and situated knowledges affect their work. Drawing from their long-term and specialized expertise, possible solutions can be identified, and potential limitations discussed. In the following section, I will now discuss two selected challenges that affect sex workers and migrants alike: Distrust of authorities and lingo-cultural barriers.

Lack of Trust

One of the underlying and most deeply-seated factors hindering access to health care and other services is a lack of trust in authorities. Whether grounded in previous personal experiences or second-hand recountings of other's stories, the belief that authorities are frequently unwilling to help or, in the worst case, endanger further worsening the individual's situation is widespread. Particularly among migrants, the omnipresent anxiety about deportation or incarceration is a strong contender against needing help or accessing one's rights (Berk & Schur, 2001). Similarly, sex workers might be hesitant due to fear of disclosing their engagement in the sex industry and being denied access or even blamed for instances of abuse, ill health, or other issues (Bugre, 2020; Maciotti et al., 2022). Xenophobia, sexism and stigmatisation of sex workers do not only prevail among Maltese citizens but also those in public offices and positions of authority, such as doctors (Depares & Culley, 2022). Stories of people being turned away, laughed at or discriminated against when attempting to access certain services are quick and easy to spread among communities:

“There's a lot of fear of being turned away and of not being treated equally. And that stops people from going. But stories like this take a life of their own. [...] They're made to feel as though they are not owed the service, and this has repercussions, right? Because if someone's very ill they might want to avoid going to a health centre [...] and by the time they actually get to see a doctor, then they're extremely ill.”

(Daniela DeBono, interview 17.8.2023)

Those in marginalised positions, confronted with a plethora of concerns and possible negative associations with authorities, therefore might have to experience a strong sense of urgency or acute danger to their health before they are willing to accept the potential risk of legal or

psychological consequences of reaching out to healthcare professionals. Distrust and actively remaining outside of the purview of (perceived) authorities thus is a protection mechanism of those who possess criminalised identities (Fuentes, 2023). The thought of “*people will hurt you*”²⁷ if you expose yourself too much is pervasive in decision-making when it comes to reaching out for support or services. This harm can take different forms, from being outright denied access, dismissed or having to pay an unexpected fee to being reported and potentially arrested or even deported. Specifically among sex workers, there might also be the concern about being pressured to exit the industry altogether to continuously make use of certain services. How likely these situations are in actuality is not only hard to gauge but also too much of a risk to take to be wrong. Secrecy and covertness thus usually take priority. Additionally, the conflation of NGOs and public institutions is a common but detrimental phenomenon. Being unfamiliar with the local system, the actors within it as well as the language fosters confusion and a blanket apprehension towards people in perceived positions of power. As Diana Tudorancea from the organisation TAMA (interview 3.8.2022) argues: “*When you come along, you need to be fully aware that you do represent the system, whether you like it or not. In people's eyes, you always do*”. Trust can be encouraged through word-of-mouth referrals from others within one’s community or similar lived experiences. However, most informal networks of sex workers are supposedly quite small and dispersed, inhibiting the flow of information about existing services and whether they are safe to access (Fuentes, 2023).

Lack of trust in the system and the people in it hence operates on a psychological level. Our subjective perception of a given situation and our position in it has a higher determinative effect on our choices and behaviour than the actual conditions of it (Madon et al., 2018; Peters, 2022). Feeling like there is a perpetual imminent danger of being exposed, incarcerated or deported coupled with the belief that the system is organised against you results in a firm hesitancy to engage with that said system:

“There is a reluctance probably mainly [because] they know that they're not ‘big enough’ to fight. It's like going into a boxing ring and you feel like a kid in front of this humongous boxer. So you'd know that you will not win the game from the very onset.”

²⁷ Maria Abela, nurse at the GU Clinic, interview 28.10.2022

And that's probably the biggest problem behind this.”

(Vice Squad officer, interview 24.10.2022)

Besides first-hand experiences of discrimination, third parties or individuals engaged in trafficking in some cases deliberately make those in vulnerable positions believe this, that reaching out for support will only end up hurting themselves. Adding to these factors affecting access of health care services, for many in precarious situations, unpredictability and uncertainty guide their everyday lives. If you do not know what will happen tomorrow and if you have fundamental needs to fulfil, you operate on a sense of urgency whereby “*economic productivity becomes the overwhelming, the only priority*” (Anderson, 2007, p. 5). One is more likely to accept a lower payment, tolerate worse living conditions and take on more dangerous jobs if the main goal of everyday life is survival, be it of yourself or of your family back home: “*Priority is always given to work. [...] So if there is an appointment [...] and you have work, you will choose the work. [...] Health comes second.*”, said Mauro Farrugia (interview 3.8.2022), CEO of the Agency for the Welfare of Asylum Seekers (AWAS), the governmental agency responsible for temporary housing for asylum seekers.

What, then, can stakeholders do to foster trust among potential service users? First, they can emphasise that they are not obliged to report them for involvement in criminal(ised) behaviour, if that is the case. Some stakeholders attempt to express this by highlighting that they work under strict anonymity. This alone is not always enough as it can still seem like anonymity does not protect them from getting into trouble or being arrested right on location. Finding the right wording that is understood by a diverse range of people as well as in line with what they are legally allowed to say is a challenging task. The message, however, should be clear: “*We don't report, we support.*”²⁸

Second, proving trustworthiness and reliability through consistency and being realistic in the promises they make directly or implicitly. The unbalanced power relation between those in marginalised positions and service providers highlights the dependence of the former on the goodwill of those with access to resources and power. Additionally, negative prior experiences can affect how likely they are to rely on other's help. Overpromising or not properly managing people's expectations is a prevalent issue, especially with service provision that is dependent

²⁸ Social Welfare Professional, interview 13.9.2022

on volunteers. Wanting to help and offering support that is out of their expertise and control and thus ultimately cannot be provided creates the belief that even those who want to help you will not do so in the end:

“Staying true to your words and not making false promises is probably one of the most important things that we can do. [...] Making promises that you can keep and will respect is the first part. [...] And being consistent with being on people's side.”

(Diana Tudorancea, TAMA, interview 3.8.2022)

“*Being on people's side*” can be achieved through understanding your (institution's) own limitations as well as service users' realities and challenges. As mentioned previously, Circumstances characterised by irregularity and precarity sometimes bring about a process of disillusionment (Caruana & Rossi, 2021). Building trust with individuals and communities thus has to go hand in hand with knowing what you can and cannot offer to service users, and ensuring that this is known and understood by them.

Language and Cultural Perceptions of Health

“Language allows us to understand the world we are living in, explain our own world, and connect with others. Language represents an entire system of thought”

(Jones et al., 2019, p. 46)

As discussed previously, health care but also other public services are at their core interpersonal encounters. Mutual understanding is an important factor for any kind of successful communication and a shared language is one of the fundamental pillars for enabling this success (Depares & Culley, 2022). Although English is one of Malta's official languages, Maltese takes on an important role when accessing services:

„There's this resistance by Maltese services to give the right service. As Maltese, we also don't get a good service. But you bully your way in with the language, right? So, language is a very important tool. [...] A tool that is used for exclusion all the time. [...] Some of the migrants who have been here 20 years speak Maltese very well. And they see that that affects the level of service they get. [...] It makes a huge difference.“

(Daniela DeBono, UM, interview 17.8.2023)

The importance of language starts before even initiating contact with a service provider. During the first stakeholder workshop conducted in October 2022²⁹, the prominence of a language barrier emerged as the main topic of the session. Attendees agreed that making information about existing services available in multiple languages is a valuable measure to promote accessibility for migrants. However, the choice of languages for translation is complicated due to the diversity of cultural and language communities in Malta. Furthermore, apart from a linguistic adaption, the content and sites where this information is available have to be adapted to the needs and customs of the intended target group(s). For example, while some might utilise social media platforms like Facebook, others get their news and information from sources located primarily in their countries of origin, and groups with a lower level of literacy would benefit more from video than written content. For reaching sex workers specifically, there is the additional question of how to share information effectively but in a way that is inconspicuous enough as to not put them in danger of exposure when accessing that information.

Nevertheless, language is not the sole indicator of an effective encounter. The ability to accurately describe symptoms and comprehension of medical measures has as much to do with language as with the cultural beliefs about health inherent to it (O'Donnell et al., 2007). The paradigm that classifies Western medicine and science as a whole as demonstrating the highest standard of objectivity and truth is influential and prevailing globally. But the embodied experience, interpretation and treatment of certain health-related conditions can vary vastly across communities and cultures. This turns the doctor-patient relationship into a fertile breeding ground for misunderstandings and conflict as they might be putting emphasis on different "*layers of illness meaning*" (Kleinman, 1988): Medical professionals are viewed to primarily operate on the level of "*clinical reality*", whereby the health problem in question is defined in line with the contemporary status quo within their discipline. Although it is important to point out that they, too, are informed by culturally-constructed understandings of health. Patients, on the other hand, tend to be predominantly encompassed by their inner world and experience of their conditions, formed by social and cultural norms and understandings. Taking these differences into account aids in explaining patients' wariness or unwillingness to take

²⁹ You can find the summary here: <https://sites.google.com/view/srhmalta2022/stakeholder-workshop>

medical advice. An example highlighting this issue and its potentially severe outcomes is the story of a woman from Ghana:

“She had to be in several times to see doctors at the health centre. [...] And they give her what the community claims to be the wrong medication. [...] And then I was speaking to a social worker about the same case after some six months, because I was quite angry. I mean, they were all mourning this woman who the story was to have been to the health centre several times, but was not treated properly. It turns out that the woman did have ovarian cancer. According to the social worker she had been diagnosed, but she had refused treatment. [...] So there was either a miscommunication at some point between the medical professionals and the woman. But the story was a lot more complex than the way it came out from the African community. And so mismatched, right? She really was in a lot of pain, and she refused to be hospitalized. And partly [...] because she was scared that her family would end up with a hospital bill. But the social worker told me that she clearly told her that this was not an issue, that they will not face a cost. But she was still scared of this.”

(Daniela DeBono, UM, interview 17.8.2022)

Stories like these can foster more mistrust and resistance among different communities. Mismatched understandings of health and medicine-related factors can fundamentally disrupt service provision and generates a need for cultural mediation and cultural competency training (Dixon-Woods et al., 2006). Increasing awareness of how varied values and culturally informed conceptions affect service provision and acceptance is one aspect. This includes conceptions of health, what is deemed socially (non-)acceptable behaviour and topics, understanding of the local system and how it affects the lived realities of patients, among others (Bradby et al., 2015). Miscommunication and a national narrative that is already breeding hostility towards foreigners further necessitate critical reflection of the medical professional’s own assumptions and biases. Due to the prevalence of migrants in the sex industry, cultural competency is particularly important in promoting sex workers wellbeing (TAMPEP, 2001). Ideally, this would include additional training on different forms of sex work, the local legal framework and destigmatising service provision (ibid.). An example given by a representative of the Migrant Health Liaison Office that offers cultural competency trainings to medical professionals demonstrates their practical value:

“When a person does not look you in the eye and it's a cultural thing, not because they are lying or because they're not interested in what you are saying. But if [doctors] don't know about it they will say ‘He's not even interested in what I'm saying. Why should I explain it to him?’. So these are issues that they will be surprised to hear during the session and it's something that they should remember when they meet the next person.”

(Migrant Liaison Office representative, interview 13.10.2022)

Patients would benefit from cultural mediators by receiving appropriate information in a form that is better aligned with their situated knowledges as well as support in communicating their symptoms and concerns. Again, the specificity of the Maltese context turns this into a difficult undertaking. To cover all language and cultural groups present in the country is impossible due to the vast diversity of people that live on the island. Recruitment of interpreters and cultural mediators frequently happens on an ad-hoc basis and within the community itself. One fundamental issue that was identified in the first stakeholder workshop was the absence of formalised training for interpreters. Insufficient abilities and familiarity with best practices can result in additional harm to service users. Development of such training was considered an important step as well as creating a list of known and approved interpreters in the country. However, who should be responsible for establishing this remained unclear. Stakeholders already recommend individuals for interpretation to each other based on their own positive previous experience with them. Although direct referral is advantageous in the sense of being faster and possibly more reliable than more formalised systems, it also generates a dilemma:

“Usually these people are the same people who are used by different entities. [There are] quite rare languages to find an interpreter [for]. So, [the same person] will be used by the police, by us, by the health services. [They] may be [an institution's] own interpreter, but [they] still work with different entities.”

(Mauro Farrugia, AWAS, interview 3.8.2022)

Apart from a dependency on individuals' availability and skill, the shortage of interpreters and cultural mediators involves another crucial issue: A potential lack of anonymity. As discussed previously, maintaining (a sense of) privacy in Malta is a general challenge to its inhabitants, citizens and migrants alike. The close physical proximity due to the small scale and the social isolation of certain migrant communities reinforce this phenomenon. Especially for members of smaller language groups, the likelihood that they know the interpreter outside of the

professional setting is high. Disclosing personal information about sensitive topics, such as mental health, financial situation or familial issues, would then indirectly be discouraged due to a fear of stigmatisation within one's community.

“In reality, people are always going to be aware of that layer. They can always bump into each other on the street, especially if they're part of the same community. [...] There could be a level of mistrust for that reason.”

(Diana Tudorancea, TAMA, interview 3.8.2022)

This concern about anonymity is particularly relevant for those engaged in commercial sex, as exposure of themselves or their clients could have direct negative consequences for them. When asked how they try to navigate this challenge, she shared two approaches: Having a clear line of communication and a relationship built on trust with the interpreters to ensure that they inform them transparently should they personally know (of) one of their service users. And encouraging service users to let them know, either through saying it or expressing it non-verbally through a hand gesture for example, that they are not comfortable with the specific interpreter. Of course, neither of these solutions are fool-proof ways to ensure safety and anonymity. Proper training and a bigger pool of interpreters and cultural mediators could prevent some of these issues. Additionally, offering not only remuneration on a case-to-case basis but employment for them could also positively affect the level of professionalisation and responsibility.

Challenges for Stakeholders

The following pages will discuss two of the most prominent areas of difficulty for stakeholders: Outreach and lack of resources. While the first hinges upon societal and discursive conditions, the latter is more based in structural and administrative hurdles for their work. Both have been mentioned and pointed out numerous times in interviews as well as in the stakeholder workshops. There are no easy or quick solutions to these problems but exploring the patterns and conditions that foster them can bring up possible points for intervention.

Outreach and Inclusion

One of the primary challenges for all kinds of stakeholders from service providers to advocates is the lack of reliable and quantitative data. Officially, little is known about the local situation in terms of the number of individuals engaged in the sex industry, their demographics, locations

and needs. Much of the limited existing research is of qualitative nature or focused on perceptions of sex work by those outside of the industry (OAR@UM, 2023). Both approaches have their validity and value through exploring the underlying assumptions and values that guide local discourse and lived realities of people. However, interventions on a bigger scale such as policy-making necessitate more insights indicating the extent and effect(s) on a quantitative basis. While these kinds of studies would give more political weight to advocates' efforts, they run the risk of neglecting the nuance and complexity of lived experiences of those at the centre of enquiry inherent to not only sex work but the human experience overall. Thus, although generalisations and arguments based on quantitative data are easier to 'sell', the importance of a qualitative lens should not be underestimated by the people in charge of decision-making. Ideally, a combination of both, quantitative and qualitative data, should inform service provision and policymaking.

The vast majority of existing studies analysing the Maltese landscape in regard to sex focus exclusively on Maltese individuals and frequently draw a direct line between sex work and drug use (for example Micallef, 2019; Scicluna & Clark, 2019). This interdependent correlation has also been pointed out in most of the interviews for this project, although with different significances and assumed extent attached to it. The existence of people engaged in the local sex industry who are active users and are funding their drug habit through it is undisputed (Calafato, 2018). Dar Hosea, for example, conducts outreach activities at the Correctional Services Agency (CSA) with women engaged in commercial sex who are imprisoned due to related or substance abuse offences (Dar Hosea, 2022). Portraying this scenario as the most common one, however, is criticised by some as being highly selective due to facilitated access to those that are already in the system because of criminalised acts connected to addiction or sex work:

“Obviously it's easier to interview the people who are in the system because they are seeking social services or because they have been arrested. [Those that] just engage in sex work once a week, twice a week with just few clients, how are we going to know that they exist? [...] But just because I can't have access to a demographic doesn't mean it's okay for me to say 'this is how it is'. And this is an issue.”

(Matthew Bartolo, Willingness, interview 22.10.2022)

This points to the fact that gathering quantitative data in a context where the topic at hand is de-facto illegalised is understandably challenging. As discussed previously, a lack of trust paired with the fear of getting in trouble with the law is hindering sex workers' willingness to participate in research projects. Few are interested in speaking openly about their involvement in the industry and do not necessarily see a benefit for themselves in doing so:

“Unfortunately, it is not easy to involve them. [...] They have their own jobs, they have their own life. [...] Their faces would be all over the media and all of Malta would know about them, because Malta's so small.”

(Maria Borg Pellicano, Dar Hosea, interview 16.8.2022)

Exposure and consequent repercussions are thus a big concern. This is especially the case for non-Maltese sex workers that have to fear deportation additionally to not being able to easily access services, speak the language or have sufficient knowledge of the local system. The hyper-focus on Maltese sex workers and those in situations related to crime is therefore, at least in part, a consequence of the legal frameworks and indirect criminalisation of commercial sex.

Another factor complicating outreach initiatives and the inclusion of sex workers into research and discourse is the question of location. Street work has decreased significantly since Covid and much of the industry has moved further inside as a consequence. As most known establishments for sex work are carrying out their activity illegally, gaining access to these spaces and the individuals within them is challenging and potentially dangerous for social workers or researchers. Moreover, it is assumed by interlocutors that a significant portion of sex work is carried out independently in private accommodation. Access is therefore made difficult through the fragmented character of the sex industry in Malta (Fuentes, 2023). Taking place in secret out of necessity, protecting oneself and one's clients from exposure is a priority. Solicitation thus frequently takes place online or through informal, less traceable means. Additionally, making contact with sex workers as a social worker or researcher is bound by certain ethical and legal guidelines. So even when it is known where and how to reach sex workers, outreach is sometimes impeded by procedural frameworks and other limiting considerations:

“No one wants to talk about it. [The researcher] tried to contact people who had an online presence, but she didn't get any response either. We were debating the ethics of pretending we were sex workers ourselves, but we decided not to. You know, that you

would have your own account and say ‘Would you want to speak to me?’ because we thought that was not particularly ethical.”

(NGO Representative, interview 1.8.2022)

The absence of sex workers themselves in the discourse and decision-making was identified as a prominent issue of the debate being “*top down rather than from [the] bottom up*”³⁰. Among the most common reasonings for it was the priority of anonymity and unawareness of the ongoing discourse on their part. Self-representation of marginalised or criminalised communities in advocacy and decision-making is an important mechanism of empowerment, enabling its members to have more control over the narrative(s) told about them and, ideally, its outcome (Agustin, 2008). The phrase “*Nothing about us without us*” has been used as a political slogan by disability activists in the 1990s, but has since then found extensive application in other social and political movements (Charlton, 1998). It demands the participation of those affected by policy-making and systemic changes at all levels of the process. In Malta, this has so far not been achieved, although attempts at inclusion have been made by some. During the reform process, Rosianne Cutajar (the Secretary of Reforms responsible at the time) has been reported to have talked to sex workers (Diancono, 2021) and the international sex worker-led organisation ESWA (European Sex Workers’ Rights Alliance) has been invited to consult. The majority of individuals within the local sex industry, however, likely remained unaware of the conversation altogether. Some interlocutors pointed out the importance of including their stories and perspectives in the debate but viewed representative advocacy as a way of protecting and not further burdening sex workers:

“They do not have a voice, not because someone is shutting them down but because they already live in so much chaotic environments, chaotic life styles, that most of them are not even aware of such discussions. [...] So we are saying ‘Let’s listen to their own stories’. [...] If they’re not available, let’s try to listen to the front liners, to the people who know these stories firsthand.”

(Maria Borg Pellicano, Dar Hosea, interview 16.8.2022)

Although the sentiment can be analysed through the lens of victimisation, it highlights an important aspect of self-representation: It requires privilege. Time, language skills,

³⁰ Migrant Liaison Office representative, interview 13.10.2022

comprehension of the system and its processes, mental and emotional capacity to share personal stories, resilience to stigma and strategies to navigate ensuing discrimination or even threats are just some examples of the privileges necessary to take part in the discourse as a sex worker. Additionally, the question of self-identification arises once more. The extent to which individuals identify with their engagement in the sex industry and their characterisation as a sex worker vary widely and directly affect their interest and perceived relevance of partaking in the political discourse (Navarrete Gil et al., 2021). But even if someone had all the necessary privileges as well as a high level of self-identification and interest, political participation in Malta would be effortful: As of now, there are no spaces or measures in place that facilitate local, sex worker-led advocacy. Self-organisation is difficult within a system that criminalises the very shared identity marker that is at the centre of the interest group (Navarrete Gil et al., 2021). Fear of exposure and stigmatisation further add to the lack of a formal sex work community or civil society organisation in Malta. This issue emerged as the main topic of the second stakeholder workshop in July 2023³¹. Sex worker-led advocacy would not only create opportunities for self-representation and lobbying for interests but could also facilitate service providers' outreach activities and conducting research by and with sex workers. All of this is not to say that no groupings of individuals within the sex industry have developed. Although not much is known about them, it is assumed by stakeholders that small informal and possibly hyper-localised networks do in fact exist. While workers in establishments like Gentlemen's Clubs likely have contact with each other, it is not clear to what extent there is a sense of solidarity, shared experience or mutual support. Two examples of small-scale networks with a low level of formality that I have come across are the following: First, mainly Maltese individuals who connect through shared localities provided by service providers. Establishments from (primarily Church affiliated) institutions offering a place to sleep for the homeless population or drop-in centres like Dar Hosea are places where they frequently meet and get to know each other. These micro-communities sometimes also create friendships and are important sources of emotional support and company. The second one is networks based on a shared origin or culture. Interlocutors shared that they are aware of sex workers within these communities soliciting clients, recommending each other, receiving protection from and primarily moving within these networks. What defines a network or community, and what benefits sex workers identify in being part of such would need further exploration. However,

³¹ Find the summary here: <https://sites.google.com/view/srhmalta2022/stakeholder-workshop>

based on these observations, two interesting aspects of outreach and inclusion become apparent: location and cultural communities. Both could be approached as potential means for outreach to get in contact with or disseminate information for sex workers in less direct ways, combating the challenge of non-existent formal networks and uncertainty about their localities (Jones et al., 2019; Navarrete Gil et al., 2021).

Lack of Resources

Further impeding proper outreach and provision of services to sex workers besides the previously mentioned challenges is the significant lack of resources and funding for such activities. Most stakeholders engaged in such initiatives are working on a voluntary basis or on a very small budget as funding from public institutions is limited. A demonstrative example of this is the GU Clinic at Mater Dei, the general hospital in Malta: As the only public provider of its kind in the country, it takes on a central role in ensuring the population's wellbeing concerning sexual health. Its lack of financial resources is thus not a consequence of an alleged irrelevance or shortage of patients. Instead, causes are rather related to a disinterest of the government and a society-wide persistent stigmatisation of talking about sex. Recently, the GU Clinic opened a second location in Gozo after years of lobbying work by the organisation LGBTI+ Gozo. Eman Borg, the founder of the NGO, shared the resistance by local decision-makers:

“After six years of constant lobbying, with the Ministry of Health, with the Prime Minister, with the Ministry of Gozo [...] we are very proud of that because we challenged the norm. [...] Everyone was telling us ‘Gozo is small, everyone knows each other, Gozitans will not go to a sexual health clinic because sex is a taboo’. I can tell you now, that is not true. The sexual health clinic is fully booked, there’s a waiting list.”

(Eman Borg, interview 6.7.2023)

As this example demonstrates, despite a clear need for certain services, funds are insufficient. The decisions by fund-givers could be argued to be grounded in stigmatisation of sex as a whole, as reflected in the country's harsh stance on abortion (The Malta Independent, 2022). Furthermore, a politicised de-prioritisation due to the fact that marginalised individuals and their concerns do not have the “*political mileage*”³² necessary to advocate for their own interests

³² Maria Abela, nurse at the GU Clinic, interview 28.10.2022

in the political sphere could also affect access to state resources and support. Exacerbated by non-citizens and other marginalised groups not being viewed as political subjects, hence often barred from partaking in decision-making processes that affect them, this results in insufficient or non-existent ensuring of their wellbeing (Agustin, 2008).

Partly as a consequence of limited financial resources, stakeholders are also struggling with human resources. Understaffing or not having enough people with the necessary training and expertise to implement certain measures has been an ongoing complaint by interlocutors. As discussed previously, virtually all of advocacy and even some service provision is undertaken by people in voluntary positions. While this is a common issue in this field, there is also another one that might be more prevalent in small states such as Malta: Frequent rotation of staff. Many projects and services seem to be dependent on individuals. So, once these individuals left their position or institution, their initiated activities abruptly stop or are discontinued. A fitting example for this is the reform process on sex work policy itself: Initiated by Julia Farrugia Portelli in 2019 and continued by Rosianne Cutajar in 2020, it quickly lost traction after her resignation in 2021 and seems like it will not, at least in the near future, be resumed. This reliance on individuals' commitment not only leads to an inconsistent offer of services but also inconsistent collaborations between different entities. As Malta operates on a face-to-face basis in terms of knowing each other personally and often in multiple roles, certain collaborations and working processes are directly linked to the specific connection(s) of the people involved. Some working relations are thus not (solely) rooted in their professional positions but in their personal networks, hence more difficult to pass on to the next person (Mitchell, 2012). Amplifying this issue of inconsistency is an insufficient or altogether missing knowledge management. Without writing down important information about processes, data and responsibilities, this knowledge gets lost during a change of personnel and causes a culture of having to "reinvent the wheel" every time. Although this can be more prevalent in NGOs due to the generally less formalised and streamlined procedures, it also happens in more professionalised fields. Hierarchical structures within entities coupled with the pursuit of professional success and development result in people's promotion to higher ranked positions that have little to do with their original profession³³. Introducing better knowledge management practices can therefore secure a continuity of services and ideally ongoing collaborations. Additionally, promoting knowledge sharing between different stakeholders would also

³³ Daniela DeBono, UM, interview 11.8.2023

positively affect the effectiveness and efficiency of their work. It seems like many are working on the same things at the same time, but separately. Combining forces at all stages and not only sharing final insights could therefore benefit service provision and research through an effective use of resources.

Conclusion

As this thesis demonstrated, sex work is a highly contested and emotionally charged topic, shaped by its local context and prevalent notions of sexuality, morality and agency. To start with, I introduced the terminology and the four primary policy models as fundamental concepts to the discourse and discussed how they affect or even determine outcomes and access to it. Analysing the public discourse in Malta, it was highlighted how the reform process in 2019 initiated a polarised dynamic characterised by a sense of urgency that has continued in the following years. Three primary causes for engagement in the public sex work debate in Malta were discussed: Felt obligation through profession or activism and how the local context interacts with it by virtue of multi-stranded relationships and creating the need for collaboration on other issues such as abortion. Personal emotional connection and how it stems from and acts in correlation with individual notions of morality. And lastly, socially constructed and ideologically informed views, primarily based on feminist movements of the last decades and how they act as another marker of demarcation between the two prominent paradigms, Decriminalisation and the Nordic Model. Malta's current border politics and its effect on the informal labour market as well as prevalent societal phenomena in regard to migration were explored. Furthermore, a description of the local sex industry was outlined. Finally, a selection of challenges for migrant(s and) sex workers as well as stakeholders themselves in accessing and providing health care and other services that emerged from research were presented. For a more extensive discussion of these and other challenges, this study will be turned into a report and shared with stakeholders in 2024.

A challenge of this research was the outreach to migrant sex workers. Although approaching inquiry and analysis from intersectionality as a guiding principle, due to ethical and security considerations it was not possible to include migrant sex workers as research participants which leads to this analysis being, to a certain extent, rather inspired by intersectionality than demonstrating its value sufficiently. Trying to dismantle the narrative of all sex workers being women and all migrants having comparable experiences, it falls short in primarily focusing on these handful of facets of identity, namely gender, ethnicity/citizenship, and engagement within the sex industry. Further enquiry could add elements to this analysis, such as age, family status, (dis)ability, sexuality, class, etc. A potential follow-up study with an extended timeline that enables the outreach and building of relationships with those at the centre of enquiry would hence be of value. Further studies in the Maltese context could focus on issues and aspects such

as men and other gender identities in the sex industry, potential strategies facilitating successful outreach by stakeholders, and a more participatory approach including people engaged in the sex industry (locally or internationally) at all stages of the project. I plan to continue my engagement and enquiry into the topic of sex work as well as the locality of Malta in the future outside of the academic sphere, where the insights and learnings developed through this project will be of much value for this undertaking.

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