

Performing the Subject-Self: A Critical Exploration of Sex Worker  
Resistance and Activism in Canada

Julie Anne Cordeiro Murray

A thesis submitted to the University of Ottawa  
in partial fulfillment of the requirements for the degree of  
Master of Arts in Criminology, Specialization in Feminist and Gender  
Studies

Department of Criminology  
Faculty of Social Sciences  
University of Ottawa

© Julie Anne Cordeiro Murray, Ottawa, Canada, 2025

## Abstract

The contemporary movement for sex workers' rights emerges from a lengthy and complex legal history of sex workers challenging dominant discourses that frame prostitution as a public nuisance, moral offence, and violence against women. The existing literature demonstrates that sex workers and sex work activists resist oppressive and reductive discourse via community-based initiatives, lobbying efforts, and strategic litigation such as the successful constitutional challenge against Canada's prostitution laws in 2013 (*Canada (Attorney General) v. Bedford*, 2013). However, there is a significant gap in understanding how sex workers and sex work activists enact resistance through embodied performance. As such, this thesis explores the ways in which sex worker rights activists resist dominant discourse and troubling public perceptions through symbolic communication and attire during protests. To this end, this research builds a conceptual framework that puts resistance literature in conversation with key theoretical insights from Michel Foucault and Judith Butler. Based on 143 publicly accessible images of sex worker rights protests in Canada between 2013-2023, a qualitative visual content analysis is deployed to examine how sex workers and sex work activists enact resistance through what the author calls the *performance of the subject-self*. The findings reveal how the subtle, creative, and symbolic aspects of sex work activism are serious and significant forms of political expression.

*This thesis is dedicated to my mom.*

## Acknowledgements

First and foremost, I extend my deepest and most heartfelt thanks to my supervisor, Chris Bruckert. This thesis would not be what it is without your support, guidance, and wisdom. I am incredibly grateful for your patience and steady commitment to this project (and to me). It was a true honour to learn from you. I am profoundly grateful to have had you as my supervisor.

A special thank you goes out to my evaluators, Valerie Steeves and Jennifer Kilty. Thank you for lending your time to provide such thoughtful and constructive feedback.

Of course, I must acknowledge and express my appreciation to those who have encouraged me along the way. Dad – There is so much I need to thank you for. You have been a constant source of support in ways both big and small. I am especially grateful for all the times you drove me to and from campus, patiently waited for me in the parking lot and always with a cup of coffee and blueberry muffin. To my sister, Jess – I am not sure if you remember but you once told me that “the final product of any project never shows the ideas that were scrapped, the sentences that were rewritten, or the challenges and hard work behind it.” You shared this at a time when I needed to hear it most, reminding me to trust the writing process, and most importantly, believe in myself. I carried your words with me and it helped me push through countless moments of frustration and self-doubt. To Cathy and Ben – I am so happy that I get to celebrate this achievement with you. Thank you for cheering me on and always reminding me how proud my mom would be.

To my partner, Tyler. As I sit down to write this, I am overwhelmed by all the ways you have shown up for me. There is no single moment that stands out above the rest, and I mean that wholeheartedly. You have been in my corner from the very beginning, championing me, lifting me up when I struggled, and meeting every doubt, fear, or setback with nothing but encouragement and a way forward. You never allowed me to feel alone in this. I could go on and on about how amazing of a partner you’ve been, but I would risk turning the acknowledgments into a full-blown love letter. I cannot thank you enough for your patience, support, and unwavering belief in me. I seriously could not have done this without you. Je t’aime.

My final acknowledgement is truly the hardest to write. Mom – Growing up, I never thought I would have to celebrate something like this without you. I always pictured this moment so clearly: You beside me, cheering as you jump up and down with your arms in the air, and pulling me into one of your proudest hugs. You’d say, “I’m so proud of you,” and then call everyone you knew to share what I had done. Now, instead of living that moment with you, I hold tightly to my memories of you and rely on them to fill in the silence of your absence. I also carry with me all the moments from when you were still here – How you would shake your head every time I doubted myself. You never had patience for my self-doubt. You’d say things like, “Oh, stop it, Julie! You’re too hard on yourself. You’re more than capable,” with such certainty (and a clear annoyance that I didn’t already believe this about myself). I know if you were here now, you’d look at me with that same fierce expression, equal parts pride and *I told you so*. Most of this thesis was written while freshly moving through the grief of losing you, and that grief sits quietly between the lines of every chapter. So, I dedicate this thesis to you – For the role you played in shaping this journey, both before and after your passing, and for the strength I found to finish it. Completing this is a reflection of that resilience and my deep love for you. I did it, Mom! Just like you knew I would.

## Table of Contents

|   |           |
|---|-----------|
| <i>Abstract</i> .....   | <i>ii</i> |
| <i>Acknowledgements</i> .....   | <i>iv</i> |
| <i>Introduction</i> .....   | <i>1</i>  |
| <b>Key Considerations</b> .....   | <b>3</b>  |
| <b>Thesis Outline</b> .....   | <b>5</b>  |
| <b>Chapter I: The Legislative Context</b> .....                                   | <b>7</b>  |
| <b>Early Legislation: Constructing the ‘Problem of Prostitution’</b> .....        | <b>7</b>  |
| <b>Legislative Changes</b> .....  | <b>10</b> |
| <b>Challenging the Constitutionality of Prostitution Laws</b> .....               | <b>15</b> |
| <b>After Bedford: Bill C-36</b> .....   | <b>18</b> |
| Section 213(1): Stopping or Impeding Traffic .....                                | 19        |
| Section 286.1: Purchasing Offence .....   | 20        |
| Section 286.4: Advertising Law .....  | 20        |
| Section 286.3: Procuring Offence .....  | 21        |
| Section 286.2: Material Benefit Offence.....                                      | 22        |
| <b>Prostitution Laws: Concluding Remarks</b> .....                                | <b>23</b> |
| <b>Chapter II: Literature Review</b> .....  | <b>25</b> |
| <b>Chapter Outline</b> .....  | <b>25</b> |
| <b>Sex Worker Resistance: The Feminist Push</b> .....                             | <b>26</b> |
| <b>The Development of the Sex Workers’ Rights Movement</b> .....                  | <b>28</b> |
| Behind the Scenes of Collective Organizing: Legislative Changes in the 1970s..... | 30        |
| Entering Centre Stage: The HIV/AIDS Epidemic.....                                 | 34        |
| <b>Collective Organizing in the Mid-1990s and Early 2000s</b> .....               | <b>38</b> |
| <b>Art and Performance in the Sex Workers’ Rights Movement</b> .....              | <b>41</b> |
| <b>Chapter III: Theoretical Framework</b> .....                                   | <b>45</b> |
| <b>Chapter Outline</b> .....  | <b>45</b> |
| <b>Not All Resistance Looks Alike</b> .....                                       | <b>46</b> |
| Everyday Resistance.....  | 48        |
| Resistance Revisited.....   | 50        |
| <b>Power</b> .....  | <b>50</b> |
| Power, Knowledge, and Discourse.....  | 52        |
| Discursive Events .....   | 54        |
| <b>Performativity</b> .....   | <b>56</b> |
| Where Do Sex Workers Fit?.....  | 57        |
| <b>Social Practices of Resistance</b> .....                                       | <b>58</b> |
| <b>Defining Resistance</b> .....  | <b>59</b> |
| <b>Chapter IV: Methodology</b> .....  | <b>60</b> |
| <b>What is Visual Content Analysis?</b> .....                                     | <b>60</b> |

|  |                   |
|--|-------------------|
| A Brief Historical Overview: An Interpretative Methodology .....                       | 61                |
| Interpreting Visual Material: Visual Content Analysis and Michel Foucault.....         | 62                |
| <b>Data Collection and Sampling.....</b>   | <b>63</b>         |
| Finalizing the Data Set .....  | 67                |
| The Challenges .....   | 68                |
| <b>Coding Process.....</b>   | <b>70</b>         |
| Creating Categories and Themes.....  | 73                |
| <b>Interpreting the Sex Work Activist Images: A Reflexive Practice .....</b>           | <b>73</b>         |
| <b><i>Chapter V: Findings &amp; Analysis (Performance).....</i></b>                    | <b><i>79</i></b>  |
| <b>The Nature of Protest.....</b>  | <b>80</b>         |
| <b>Theme #1: Past and Present Fight for Sex Workers’ Rights .....</b>                  | <b>84</b>         |
| Subtheme #1: Sounds of the Past and Present Fight for Sex Workers’ Rights .....        | 85                |
| Subtheme #2: Embodying the Past and Present Fight for Sex Workers’ Rights.....         | 88                |
| <b>Performing the Subject-Self .....</b>   | <b>94</b>         |
| Theoretical Underpinnings .....  | 94                |
| <b>Theme #2: Red-Light Revelations: Colour as a Marker of Resistance.....</b>          | <b>96</b>         |
| <b>Unpacking Broader Visual Strategies .....</b>                                       | <b>99</b>         |
| <b>Theme #3: Dress to Resist.....</b>  | <b>101</b>        |
| Subtheme #1: Costuming Stereotypes.....  | 104               |
| <b>Theme #4: Performing the Subject-Self, Reframing the Narrative.....</b>             | <b>107</b>        |
| Subtheme #1: “I Tell Him, You Just Say, ‘Yeah, That’s My Mother’” – Valerie Scott..... | 112               |
| <b>Concluding Remarks: Pulling the (Red) Threads Together .....</b>                    | <b>114</b>        |
| <b><i>Chapter VI: Finding &amp; Analysis (Discourse).....</i></b>                      | <b><i>116</i></b> |
| <b>Criminalization Harms, Not Helps .....</b>  | <b>117</b>        |
| <b>Sex Worker Rights Are Not Exceptional Rights .....</b>                              | <b>120</b>        |
| <b>Concluding Remarks: A Labour Rights Perspective.....</b>                            | <b>124</b>        |
| <b><i>Conclusion.....</i></b>  | <b><i>128</i></b> |
| <b>Future Research .....</b>   | <b>128</b>        |
| <b>A Final Reflection .....</b>  | <b>131</b>        |
| <b><i>References .....</i></b>   | <b><i>132</i></b> |

## Introduction

*“Whores are safe sex pros! We are the ones who put the condom on the guys. We are the ones who do the education, and what do we get for it? ‘Prostitutes are spreading AIDS.’ That’s bullshit. As I said the other day, if that were true, half the government would be dead already.”*

– Valerie Scott

These words come from a two-minute speech that Valerie Scott, a former sex worker and long-time sex work activist, delivered outside of the World Trade Centre in Montréal, Québec, in 1989. Dressed in a fitted, black long-sleeve dress, she addressed the crowd just moments before sex work activists entered the commercial exhibition space, where condom companies were promoting safe sex as part of the 5th annual International AIDS Conference. She stood among fellow activists, including Danny Cockerline, Cheryl Overs, Andrew Hunter, and Carol Leigh (otherwise known as the Scarlot Harlot), who had also gathered to participate in a number of protests to promote sex workers’ rights throughout the six-day conference. Scott’s witty and humorous remarks were calling attention to a critical and pressing issue impacting the rights and safety of sex workers in Canada. She highlighted how sex workers were being scapegoated for the spread of HIV/AIDS, resulting in anecdotal accounts of the rise in (informal) police practices of confiscating condoms from street-based workers. Scott not only raised this as an issue with Canada’s criminal justice policy, but pleaded passionately for others to recognize the hypocrisy in how drug and condom companies can sell (and endorse) safe sex practices, yet prostitutes in Canada were being criminalized for selling their (safe) sex services. As such, at the end of her speech, Scott revealed their intention to storm the Trade floor, advocate for their rights, and expose the hypocrisy by announcing “[their] prices and [their] services.”

The performance, as shown in *Our Bodies, Our Business* (2016), began with a striking visual: The Scarlot Harlot (aka Carol Leigh) standing in the exhibition hall, wearing a red dress that closely resembled a Victorian ballgown. She also had a large, red bow clipped into her curly hair. This bold, unmistakably theatrical appearance signals a deliberate presentation of the self, making her presence known even before she announced their arrival on the Trade floor. She then initiated the protest with: “Who would like to be the first to solicit?” This is when Scott re-entered the frame, and with a big smile on her face, shouted, *Fifty Dollars! Fifty Dollars For A Blowjob!* The camera then followed her as she walked confidently in her beige kitten heels toward a crowd of people (who have presumably gathered to watch condom-product demonstrations) and repeatedly chanted, *Safe Sex For Sale! Fifty Dollars For An Hour of Pleasure.* Other activists soon joined in with their own humorous and satirical expressions of soliciting safe sex. As they continued marching through the convention, the camera briefly panned over to capture the reaction of those witnessing the performance. Despite the uncomfortable and disapproving looks of some, Scott maintained her tenacity in the face of such (non-verbal) opposition and defiantly asserted: *If You Can Sell Your Wares, So Can We!*

The Scarlot Harlot characterized the performance as an act of “civil disobedience,” naming it as a form of resistance to the treatment of prostitutes at the conference. In fact, the collective grievance was that a sex workers’ rights perspective had been absent in conversations relating to the prevention of HIV/AIDS and the protection of those deemed most at-risk for contracting the virus. As such, this performance at the AIDS conference marks a significant and critical moment in time in which sex workers in Canada constituted themselves as safe sex professionals (and did so in both verbal and non-verbal terms). I was surprised to find that the embodied (or non-verbal) nature of resistance in sex work activism has largely escaped scholarly attention. Therefore, this

thesis explores some of the ways in which sex workers and sex work activists engage in what Judith Butler (2015) calls “corporeal resistance” to challenge dominant discourse, navigate and/or negotiate their subjectivities, and confront (what they perceive to be) problematic assumptions about their lives and work (p. 83).<sup>1</sup> I specifically put resistance scholarship in conversation with Michel Foucault and Judith Butler to examine how sex workers may strategically present themselves (which may align with or even exaggerate stereotypical sex worker imagery) to push the boundaries of the moral sensibilities of the public, while at the same time challenge stereotypical assumptions and position themselves as subjects worthy of dignity and rights. To this end, I collected and analyzed 143 publicly accessible images of sex work activism in Canada between 2013-2023. This research is guided by the following research questions: (1) How do sex worker rights activists articulate messages of dissent and challenge dominant discourse through symbolic communication and embodied performance during protests? (2) In what ways do sex worker rights activists resist stereotypical assumptions and troubling public perceptions via their appearance and attire? (3) What messages are being conveyed in the sex work activist images? And how might the corporeally enacted messages reinforce, expand, and/or offer new insights into the written claims found on protest signs?

### **Key Considerations**

Before delving into the substance of this thesis, it is essential to make clear that this project is aligned with the sex workers’ rights perspective as it is currently articulated by the movement. I am also deliberate and intentional in my use of certain terminology, especially as I engage with and discuss the criminalization of prostitution in Canada. That said, coming from the well-established position that *sex work is real work*, it is important to address the significant transition

---

<sup>1</sup> For clarity purposes, “corporeal resistance” and “embodied resistance” will be used interchangeably throughout this thesis.

from the word “prostitution” to “sex work” in activist writings. In the 1970s, the late Carol Leigh, a renowned and beloved sex work activist, coined the term “sex work” to better encompass the diverse range of labour in the sex industry (Berg, 2014; Koken, 2010; Renegade & Pottenger, 2019).<sup>2</sup> According to Heather Berg (2014), Leigh invented the term to create unity among sex workers and educate the public by introducing non-stigmatized language. The now-popular slogan, *sex work is real work*, locates sexual labour as a socio-economic question and follows a rights-based framework.<sup>3</sup> Since its invention, the term “prostitution” (and “prostitutes” by extension) is more commonly found in criminal justice policy and historical records. However, scholars who hold abolitionist<sup>4</sup> views often refer to sex workers as prostitutes (or prostituted) and thereby invoke harmful stereotypes and reject sexual labour as a legitimate income-generating activity (Parent & Bruckert, 2012). Often compared to systems of oppression, Colette Parent and Chris Bruckert (2012) explain that the term “prostitution” imposes a moral judgement that perpetuates stigmatic assumptions about sex industry work.<sup>5</sup>

Alternatively, the term “sex work” is more commonly found in activist writings and social justice literature (Berg, 2014; Shaver, 2019). This labour-oriented language is part of the foundation of the contemporary movement for sex workers’ rights. The term “sex work” helps remove the assumed status of a victim, defining sex workers “as people capable of choice and

---

<sup>2</sup> The term “sex work” encompasses a diverse range of individuals working in the sex industry and various forms of sexual commerce. This includes erotic dance (e.g., stripping or striptease performances), escort services, massage parlours, phone sex, webcam services, and actors in pornographic films. It is important to note that many sex workers perform their labour within a legal grey zone and current criminal justice policy is not enforced equally among those working in the industry.

<sup>3</sup> It is important to emphasize that this sentiment stems from advocacy efforts designed to socially recognize sex work as a legitimate occupational choice under capitalism. In sex work studies, many scholars and sex work activists have conceptualized sexual labour as comparable to other service-sector jobs (Parent & Bruckert, 2012).

<sup>4</sup> In the context of prostitution, the abolitionist perspective refers to the belief that the sex trade must be eliminated. This approach is discursively linked to radical feminism, as both perspectives contend that prostitution is (and endorses) sexual violence against women (Dworkin, 1993; Collins, 1990; MacKinnon, 1989) and that the solution lies in implementing strict criminal justice policy that ends the demand for prostitution (Bateman, 2021; Galbally, 2016).

<sup>5</sup> In Parent and Bruckert’s (2012) chapter, *The Current Debate on Sex Work*, “systems of domination” refer to “slavery, racism, and capitalism” (p. 13).

action” (Parent & Bruckert, 2012, p. 23). It also allows for a more nuanced and complex discussion (and critique) of the capitalist system, rather than the current view as a “problem” that can presumably be fixed without having to address economic conditions. While Karni Kissil and Maureen Davey (2010) claim that this shift in language has been relatively unsuccessful in reducing social stigma, the rhetoric of *work* “offers a welcome reprieve” from the anti-prostitution agenda that continues to influence criminal justice policy in Canada (Berg, 2014, p. 694). As such, throughout this thesis, I am choosing to deploy the terms “sex work” and “sex worker.” I only use the terms “prostitution” and “prostitutes” (and do so deliberately) when referencing criminal justice policy and regulatory approaches that have defined sexual labour as needing to be controlled or regulated.

### **Thesis Outline**

This thesis begins with a detailed overview of prostitution laws in Canada. Starting with the vagrancy provisions in 1839, I discuss key legislative shifts and changes to criminal justice policy, tracing how they have evolved to what they are today. I also reveal how regulatory approaches have almost always coincided with how prostitution has been socially understood. Building on this legislative foundation, Chapter II provides a comprehensive review of the literature related to the development of sex worker-led organizations in Canada. I rely on a small body of literature that highlights some of the strategies sex workers have employed to speak out against discrimination, systemic oppression, and stigmatic assumptions regarding their lives and work. While the primary objective of this chapter is to demonstrate the gap my thesis aims to fill, it is also my intention to ensure an in-depth understanding of the historical, social, and political conditions shaping the contemporary movement for sex workers’ rights.

Chapter III outlines the theoretical framework I developed to examine how sex workers and sex work activists corporeally enact resistance. I specifically draw upon Michel Foucault and Judith Butler to develop a renewed understanding of resistance, engaging with the concept of power, discourse, and performativity. These concepts, when used together and further developed as they are applied, informed this thesis's concept of *performing the subject-self*. Chapter IV outlines the methodological framework utilized to systemically engage with the visual data. I begin this chapter by introducing visual content analysis, the qualitative research method I employed to examine the sex work activist images. I discuss the data collection process, including some of the challenges I encountered gathering the visual data, and the three phases of coding. I conclude this chapter with a discussion of the ethics to consider when conducting visual research. I present and engage with the findings of the visual content analysis in two chapters. In Chapter V, I discuss four major themes that emerged from the visual data as they relate to symbolic communication and embodied performance. In Chapter VI, I examine the written messages of dissent conveyed through the protest signs. This thesis concludes with a brief summary and reflection on the findings. Importantly, I discuss potential areas of future research, including opportunities to apply the conceptual framework I used to theorize resistance in the sex workers' rights movement.

## Chapter I: The Legislative Context

The contemporary sex workers' rights movement has a complex and lengthy history of championing the rights of sex workers in the context of repressive laws. Therefore, in order to engage with sex worker resistance, it is necessary to understand the legal and discursive context in which the movement emerges and which it continues to navigate. The primary aim of this chapter is to provide a detailed overview of prostitution laws from 1839 to 1972 and discuss how they have evolved to what they are today. In the course of this discussion, it will become evident how regulatory approaches in Canada have historically been geared toward banning all prostitution-related activities on the basis that it is a public nuisance. The framing of *prostitution as a public nuisance* emerged in the 19<sup>th</sup> century and was particularly informed by moral values held at the time. Indeed, sex workers (or “prostitutes” as they were known) were associated with promiscuity and deviancy, as they threatened the moral order and social conventions dictating “acceptable” female behaviour (Scouler, 2010). As trends and values changed, there was an emerging discourse of victimhood. However, sex workers would come to be simultaneously recognized as both perpetrators of moral and social harm (victimizer) and as victims in need of protection (victimized) (Bruckert & Hannem, 2013; Hunt, 2002). It is through this legislative overview that we see the existence of three distinct discourses that have shaped and informed criminal justice policy at various, yet critical and significant times: prostitution as a public nuisance, moral offence against society, and violence against women.

### **Early Legislation: Constructing the ‘Problem of Prostitution’**

The first statute to mention prostitution was passed in lower Canada in 1839, allowing police to arrest “any common prostitute or nightwalker” found in a public place and who did not, when required, provide a “satisfactory account of herself” (Backhouse, 1985; McLaren, 1986;

O'Connell, 1988; Sangster, 2001). These vagrancy laws replicated those in England; however, were enforced more harshly in Canada (Backhouse, 1985). Indeed, women were targeted based on their perceived deviant status and not for particular acts (i.e., the legal standard in England) (Backhouse, 1985). Prostitution in Canada was also criminalized through bawdy-house provisions (Backhouse, 1985; Russell, 1982). These deemed that “everyone who keeps a disorderly house commits a common nuisance” (Russell, 1982, p. 274). By 1917, a common bawdy-house was legally defined as any “house, room, set of rooms, or place of any kind kept for the purposes of prostitution or for the practice of acts of indecency” (*Criminal Code*, 1892, s. 225 as cited in Russell, 1982, p. 274). Anyone found in a brothel could thus be charged, although Constance Backhouse (1985) claims that, between 1865 and 1895, clients faced significantly fewer convictions than prostitutes. This appears to have been a persistent trend across all prostitution-related offences (see also McLaren, 1986), likely due to prostitutes’ framing as morally corrupt and socially harmful (Hunt, 1997), whereas male customers were viewed as acting upon “normal” sexual impulses and otherwise respectable men whose actions were understood more as private indiscretions (Backhouse, 1985).

The social and legislative response to prostitution was thus conditioned by how it was understood: a public nuisance, social evil, and moral offence against society (Backhouse, 1985; Russell, 1982). During this time, however, legal scholars describe the enforcement of prostitution laws as “both sporadic and capricious” (McLaren, 1986; Shaver, 1994). In practice, the enforcement of prostitution laws was largely dependent on whether “prostitution was seen as a direct threat to respectable members of the [community] or necessary to local conditions” (McLaren, 1986, p. 127). As such, historical records suggest that prostitution was relatively tolerated in port cities with a high male population (McLaren, 1986; Snider, 1990) and specifically

in places known as red-light districts (Gray, 1971; McLaren, 1995; Nilsen, 1980). Deborah Nilsen (1980) has shown, for instance, that brothels in Vancouver operated with limited state intervention between 1905 and 1908. It was not until residents' groups began putting pressure on law enforcement to remove prostitutes from urban areas on the basis that they "were a standing menace to the moral wellbeing" of young people (Nilsen, 1980, p. 4). It would appear then, as Frances Shaver (1994) observes, that police only enforced laws to keep-up appearances. However, these attempts to address "public disorder" did very little to reduce prostitution and only resulted in "its dispersal to less obvious locations" (McLaren, 1986, p. 146).

Prostitutes were also associated with disease and contagion. These discourses were sustained and reproduced in early Canadian law.<sup>6</sup> For example, in 1865, the *Contagious Diseases Act* (CDA) was passed to protect military men from contracting venereal disease (VD) from prostitutes (Backhouse, 1985; McLaren, 1986; Walkowitz, 2016). This legislation authorized the detention of prostitutes suspected of having the disease in "certified hospitals" for up to three months (Backhouse, 1985; McLaren, 1986). While the CDA was only in effect for five years and had very little impact (especially when compared to its successful enforcement in Britain<sup>7</sup>), regulatory discourse around this time catalyzed broader debates among social reformers over how to best contain or control the perceived threat of prostitution (Hunt, 2002; McLaren, 1986). We also see, for example, middle-class women situating themselves as "virtuous" and thus categorically different from that of "fallen" women (Scouler, 2010; Walkowitz, 2016). In short,

---

<sup>6</sup> Public health concerns over the spread of disease from prostitutes re-emerged following the first World War, and once again during the HIV/AIDS crisis in the 1980s (to be discussed in Chapter II).

<sup>7</sup> While historical records rarely document resistance in the 19<sup>th</sup> century, archival research conducted by Judith Walkowitz (2016) suggests that the social and legislative response to prostitution during this time (specifically when medical discourse of contagion and disease were in full swing) was not left unchallenged. After reviewing 900 pages of interview transcripts with "street women" in Britain, Walkowitz (2016) shares testimony from one woman who made a "defiant [and] unapologetic defence" for prostitution (p. 194). The woman reportedly emphasized that "she is selling her services, not her 'body and soul'" (Walkowitz, 2016, p. 194). Although this is not described as an act of resistance, Walkowitz (2016) notes a clear discursive departure from dominant discourse at the time.

prostitutes reportedly threatened not only the health, but also the moral character of the nation state and therefore needed to be regulated and/or abolished through strict criminal justice policy (Abrams, 2000; Messerschmidt, 1987; Scoular, 2010).

Between 1869 and 1892, the federal government stiffened criminal penalties and added new provisions that criminalized anyone found to be living on the avails of prostitution and procuring women for “unlawful carnal connection” (Shaver, 1994). These statutes were codified as gender neutral; however, in practice, disproportionately targeted women (van der Meulen & Durisin, 2018). In 1892, statutory provisions relating to vagrancy, procuring, and the keeping of a common bawdy-house were amalgamated into the first *Canadian Criminal Code* and remained relatively unchanged until 1972. During that time, in addition to the vagrancy provisions, prostitution was regulated by three main statutes in the *Criminal Code*: Section 210 (the keeping of a common bawdy-house),<sup>8</sup> section 211 (transporting a person to a bawdy-house),<sup>9</sup> and section 212 (living on the avails of prostitution).<sup>10</sup>

### **Legislative Changes**

In 1972, vagrancy laws were repealed, and prostitution ceased to be a status offence (Shaver, 1994). In its place was a “gender-neutral” law that prohibited soliciting in a public place for the purposes of prostitution (*Criminal Code*, 1970, s. 195.1). However, ‘soliciting’ was not

---

<sup>8</sup> Section 210 prohibited owning, managing, working in, and/or visiting a common bawdy-house. The law criminalized anyone who was an inmate of (s. 210(a)) *or* found without a lawful excuse inside (s. 210(b)) a common bawdy-house. In effect and enforcement, this law targeted owners, managers, receptionists, and anyone who knowingly assisted in the running of an establishment where sexual services were provided (s. 210(c)) (Hannem & Bruckert, 2013).

<sup>9</sup> Section 211 criminalized anyone who knowingly “transported, or offered to transport or direct, any person to a common bawdy-house.” In practice, the law severely restricted sex workers’ ability to *legally* hire drivers to take them to and from client arranged locations (Bruckert & Chabot, 2010). Therefore, sex workers were forced to work without security measures in place, increasing their isolation and vulnerability to violence (Purvis, Bruckert, & Chabot, 2015).

<sup>10</sup> Section 212 was comprised of seven provisions, three of which directly impacted the safety of sex workers. In effect, the law criminalized anyone whose “income [was] contingent on a sex worker’s labour,” including managers, receptionists, drivers, and other third-parties who were reasonably compensated for the services they provided (Hannem & Bruckert, 2013, p. 321).

clearly defined in the *Criminal Code*, giving law enforcement considerable discretionary power to target any behaviour or conduct deemed suggestive of selling sex (O'Connell, 1988). This reproduced many of the same issues and concerns with the vagrancy laws, as women continued to be disproportionately targeted by police and charged with solicitation (van der Meulen & Durisin, 2018). Deborah Hutt, for example, was charged with solicitation after “returning a smile” to an officer dressed in plain-clothing and agreeing to offer sexual services while sitting inside his unmarked police car (*R v. Hutt*, 1978). The subsequent court proceedings sparked significant debate on the correct application and interpretation of the soliciting law, with the case ultimately reaching the Supreme Court of Canada.

In 1978, the Supreme Court clarified the parameters of section 195.1, ruling that solicitation must be “pressing and persistent” (*R v. Hutt*, 1978). This affirmed that soliciting required more than just “a simple nod of the head to attract a client” (van der Meulen & Durisin, 2018, p. 30). The ruling, known as the *Hutt* decision, impeded the ability of law enforcement to arrest and charge sex workers (Brock, 1998; Lowman, 1986). This sparked public outcry and immediate criticism, particularly from mayors of major cities, police associations, and middle-class residents. They argued that the ruling made it nearly impossible for communities to “contain” street prostitution (Brock, 1998, Jeffrey, 2004; Lowman, 1998). These concerns were supplemented by numerous complaints of noise and litter such as needles and used condoms in residential areas (Lowman, 1998). In response to these alleged instances of nuisance, municipalities enacted city bylaws designed to remove sex workers from their homes and places of work (Brock, 1998). While many of these laws were later deemed invalid for contravening federal legislation, (street-based) sex workers were effectively displaced (Brock, 1998).

The intense public reaction to the *Hutt* decision was directly linked to processes of gentrification and urban reconstruction of major Canadian cities (Beer, 2018; McKenna, 2022; Page, 2018; Ross, 2010). It is within this context that the “problem” of prostitution was re-entrenched as a public nuisance; however, Shaver (1994) suggests a notable discursive shift between moral reformers in the 19<sup>th</sup> century and residents’ groups in the late 1970s. Rather than a perceived threat to the moral order, residents’ groups argued that prostitution threatened the economic success of gentrifying neighbourhoods (Brock, 1998). Accordingly, the “visibility” of street prostitution, including the running of adult entertainment shops, raised concerns over the potential decline in property values and the operation of “reputable small businesses” in urban areas (Brock, 1998, p. 32). At the same time, middle-class residents, and especially their children, were postured as the primary victims of prostitution (Lowman, 1998; Shaver, 1994). Within this view, the only way to address the problem of prostitution was to “keep the prostitute out of public mind and sight” (Lowman, 1986, p. 1).

Notably, residents’ groups and their aggressive anti-prostitution campaigns did not go unchallenged. Indeed, sex workers, albeit in smaller numbers, mobilized to resist actions that removed them from neighbourhoods they once called home (Brock, 1998). Sex workers were also challenging stereotypical and troubling assumptions that had effectively rendered them outsiders to the community (McKenna, 2022). In response to these growing tensions, the government commissioned the *Special Committee on Pornography and Prostitution* (the Fraser Committee) to review prostitution laws and propose policy recommendations (Brock, 1998; Jeffrey, 2004; Lowman, 1998; Shaver, 2019). After two years, the Fraser Committee released its final report comprising over a hundred recommendations that would allow prostitution to legally operate indoors (Brock, 1998). This involved loosening bawdy-house (s. 210) and procurement laws (s.

212(j)). These recommendations, though, were never implemented. Instead, the federal government proposed *Bill C-49*, otherwise known as the “communicating law.”

The law, passed in 1985, (s. 213 of the *Criminal Code*, 1985), replaced the previous provision that solicitation must be “pressing and persistent.” Moreover, the new law broadened the legal definition of a public place, making it a criminal offence to communicate the exchange of sexual services inside of a motor vehicle.<sup>11</sup> The law stated:

**213(1)** Every person who in a public place or in any place open to public view  
**(a)** stops or attempts to stop any motor vehicle,  
**(b)** impedes the free flow of pedestrian or vehicular traffic or ingress to or egress from premises adjacent to that place, or  
**(c)** stops or attempts to stop any person or in any manner communicates or attempts to communicate with any person for the purpose of engaging in prostitution or of obtaining the sexual services of a prostitute is guilty of an offence punishable on summary conviction.

Public reaction to the newly enacted law varied considerably. Unsurprisingly, residents’ groups deemed it necessary to adequately control the “problem” of prostitution (Brock 1998; Lowman, 1986; O’Connell, 1988). This codified the framing of sex workers as a threat to public safety, and the harms associated with prostitution as something from which “respectable” members of the community needed to be safeguarded. Alternatively, sex workers became increasingly vocal about the impacts of criminalization and displacement of street prostitutes. For instance, many sex workers were forced to relocate and started working in less populated and poor-lit areas (O’Connell, 1988; Scott, 2019). At the same time, clients were fearful of arrest and began “picking up prostitutes and driving them out of their area of work to more remote and unfamiliar [locations]”

---

<sup>11</sup> The broadening of the legal definition of ‘public place’ to include the inside of a motor vehicle is particularly significant when considering how the Supreme Court of Canada previously established in *R v. Hutt* (1978) that the inside of a motor vehicle was, in fact, a private space rather than a public one. The ruling, in theory, allowed sex workers to offer and negotiate sexual services with potential clients while sitting in a parked car (O’Connell, 1988). This component of the *Hutt* decision faced strong opposition from police and residents’ groups, as they saw it as another hindrance to the effective enforcement of prostitution laws (Lowman, 1986). In light of this, it is evident how public discourse and social attitudes have shaped, informed, and otherwise coincided with legislative responses to prostitution.

(O'Connell, 1988, p. 142). This not only escalated experiences of sexual and physical violence, but severely limited sex workers' access to safety and health services (Bunch, 2014; Lowman, 2000; Shannon et al., 2008).

It would appear that protecting sex workers from violence was not a priority among law enforcement during this time. In fact, when sex workers contacted police to report abuse, the typical response was that "they deserved what they got" (Elizabeth Fry Society of Toronto, 1987, p. 7). John Lowman (1989), a Canadian criminologist, put forth that police may have found it difficult to protect those that they are "accustomed to treating as criminals" (p. 133). In later work, Lowman (2000) suggests that police may have also failed to protect sex workers from violence as doing so could have been perceived as condoning prostitution; a perception they sought to avoid given the societal push to "get rid" of street-based workers. These prevailing attitudes informed the ideological framework through which violence was not only neglected but almost rationalized, justifying police inaction (Lowman, 2000).

These concerns were especially heightened when an alarming number of street-based sex workers, many of whom were Indigenous, were reported missing and murdered in Vancouver's Downtown Eastside (DTES) in the 1980s and 90s (Culhane, 2003; Lowman, 1989, 2000; Lowman & Fraser, 1995). Police failed to respond to these reports, dismissing families and their fears that a serial killer was responsible, which for some, devastatingly turned out to be the case (Lowman, 2000).<sup>12</sup> The mayor of Vancouver even announced that "municipal authorities were not prepared to fund a location service for prostitutes" (Stall, 1999 as cited in Lowman, 2000, p. 999). This further demonstrates that, despite prostitution no longer being a status offence, the framing of

---

<sup>12</sup> In 2001, Robert Pickton was arrested for killing 26 women at his family's pig farm in Port Coquitlam, B.C. Pickton, known as one of the most notorious serial killers in Canada, was convicted of six counts of second-degree murder in 2007 (Culhane, 2003). He reportedly confessed to killing close to 50 women, and to put things into perspective, at least 65 were reported missing between 1978 and his arrest in 2001 (Orie, 2024).

prostitution as a public nuisance was so deeply entrenched that sex workers were systematically denied access to justice and legal protections (Lowman, 2000). As Natalie Snow, Mollee Steely, and Tusty ten Bensel (2020) state, “the unsafe working conditions and violent victimization of sex workers were the primary impetus for challenging the legitimacy” of prostitution laws in the courts (p. 2). As such, I now turn to the successful constitutional challenge against prostitution laws in Canada (famously known as the *Bedford* case).

### **Challenging the Constitutionality of Prostitution Laws**

In 2008, one current and two former Ontario sex workers, Amy Lebovitch, Terri-Jean Bedford, and Valerie Scott (yes, the same Valerie we met in the introduction of this thesis), launched a constitutional challenge to three provisions in the *Criminal Code of Canada*. More specifically, the applicants challenged provisions that prohibited being kept or found in a common bawdy-house (s. 210), living on the avails of prostitution (s. 212.1(j)), and communicating for the purposes of prostitution (s. 213(1)(c)). They argued that these laws infringed upon the principles of justice guaranteed under section 7 and section 2(b) of the *Canadian Charter of Rights and Freedoms* (*Canada (Attorney General) v. Bedford*, 2013).<sup>13</sup>

As the constitutional challenge made its way through the courts, the debate surrounding the regulation of prostitution was brought into sharp focus (Bunch, 2014; Hannem & Bruckert, 2013). Put simply, the discursive tension (which, of course, exists outside of the courtroom) was rooted in ideological differences in terms of how the Crown and appellants understood and framed the “problem” of prostitution. The main argument against prostitution was founded upon the violence and danger presumed to be inherent to the sex industry. Thus, the Attorneys General argued that the laws operated to protect women from such harms. This notion of “protection” is

---

<sup>13</sup> Section 7 of the *Charter* guarantees the right to life, liberty, and security of the person, whereas section 2(b) guarantees freedom of expression.

tied to broader social constructions of victimhood, which paradoxically tends to hold sex workers responsible for their experiences of violence (Scoular, 2010). For instance, the Attorneys General for Ontario and Canada argued that “sex workers choose to engage in an inherently risky activity,” and as a result, bring violence upon themselves (*Canada (Attorney General) v. Bedford*, 2013, para. 79).

To further support the constitutionality of the challenged provisions, the Attorneys General identified third parties as the primary source of violence against sex workers (*Canada (Attorney General) v. Bedford*, 2013). This included clients “who use and abuse prostitutes and the pimps who exploit them” (*Canada (Attorney General) v. Bedford*, 2013, para. 84). This logic corresponds to broader moralizing assumptions that sex workers need to be “protected” and/or “rescued” from the sex industry (Bruckert, 2015). Those who adopt this ideology are often in favour of laws that seek to end the demand of prostitution by criminalizing clients and anyone who helps facilitate the transaction of sexual labour (Galbally, 2016; Hudson & van der Meulen, 2013; Lowman, 2013). Alternatively, the appellants, and those who intervened in support of the constitutional challenge, framed the issue of violence as a result of repressive and discriminatory criminal justice policy (Belak, 2018; Hudson & van der Meulen, 2013). They argued that sex work is not inherently dangerous; it is the operation of the laws that make sex workers vulnerable to violence. Thus, the challenged provisions produce manufactured conditions of vulnerability.

These tensions were also found in the factums and oral submissions made to the Supreme Court of Canada (Hannem & Bruckert, 2013). While POWER and Maggie’s, two sex worker organizations, were denied intervenor status at the Supreme Court hearings, a sex workers’ rights perspective was reflected in testimony from allied organizations such as Pivot Legal Society and the Canadian HIV/AIDS Legal Network (Hannem & Bruckert, 2013). These organizations argued

that sex workers should have “access to the same rights to workplace safety and personal security” as other service-industry workers do (Heath, Braimoh, & Gouweloos, 2016, p. 210). In contrast, those who intervened in support of the government imposed a narrative of victimhood (Hannem & Bruckert, 2013). The Women’s Coalition for the Abolition of Prostitution, for example, advocated for stricter criminal justice policy to protect women from the (perceived) harms of prostitution (Bruckert & Hannem, 2013). In a revival of 19<sup>th</sup> century moral values, the Christian Coalition testified that “prostitution degrades the community” and proclaimed that the laws serve a greater purpose to safeguard “public morality” (Bunch, 2014, p. 55). To this end, the Attorneys General portrayed sex workers as responsible for their victimization (Hannem & Bruckert, 2013), while at the same time, “hapless victims” in need of protection (Belak, 2018, p. 54).

As Stacey Hannem and Chris Bruckert (2013) discuss, the legal argument against prostitution deployed a “victim-feminist trope” which denied sex workers’ agency to freely choose and engage in sex work (p. 327). Indeed, the Crown, adopting the language of intervening “feminist” groups, presented a constrained agency due to pre-existing inequalities such as poverty that push women into prostitution and undermine their ability to “escape” the industry (Hannem & Bruckert, 2013). This perspective has historically been sustained and reproduced by the courts. That is until 2013, when the Supreme Court of Canada unanimously ruled that all three provisions in the *Criminal Code* were unconstitutional.<sup>14</sup> Generating over twenty-five thousand pages of evidence, the Supreme Court affirmed that the “challenged provisions were primarily concerned with preventing public nuisance, rather than sex workers’ safety or dignity” (Campbell, 2015, p. 32). Furthermore, the Supreme Court agreed with the appellants’ argument that the three impugned

---

<sup>14</sup> In 2013, the Supreme Court of Canada ruled that the three challenged provisions (s. 210, s. 212.1(j), and s. 213(1)(c)) infringed upon the rights guaranteed under section 7 of the *Canadian Charter of Rights and Freedoms* and cannot be saved by section 1 (*Canada (Attorney General) v. Bedford*, 2013).

laws prevented sex workers from properly screening clients, establishing regular clientele, negotiating terms of sexual services, finding safe locations, and working with security guards and/or drivers to ensure their safety (Belak, 2018). This decision affirmed what sex workers had been vocalizing throughout their decades of activism (Belak, 2018). It validated the grievances expressed by sex workers, representing “a critical turning point in the legal dialogue around sex work in Canada” (Belak, 2018, p. 55).

### **After Bedford: Bill C-36**

The Supreme Court of Canada stayed the decision, giving the federal government one year to revise legislation regulating prostitution if it so chose. If the government did not enact new laws, prostitution would effectively be decriminalized in Canada, which is the preferred regulatory approach among sex worker rights activists (Benoit et al. 2018; Mensah et al., 2019; van der Meulen, 2011; van der Meulen & Durisin, 2008; Vanwesenbeeck, 2017). However, on December 6, 2014, the Conservative government passed *Bill C-36*, the *Protection of Communities and Exploited Persons Act* (PCEPA), and for the first time in Canada’s legal history, the purchase of sexual services was criminalized (Department of Justice Canada, 2017). Based on the Nordic/Swedish model of prostitution, the stated objective of PCEPA is to end the demand for prostitution by criminalizing those who purchase sexual services, including sex workers’ regular clientele.<sup>15</sup>

As Phoebe Galbally (2016) suggests, the new legal regime represents a discursive alignment with radical feminist thought which portray those engaged in sex work as (sometimes unknowing) victims. PCEPA has a particular interest in protecting women and girls, specifically

---

<sup>15</sup> The logic underpinning PCEPA resembles the abolitionist approach to prostitution (see definition in the introduction, supra note 4, at 4). Within this view, it is argued that the commercial exchange of sexual services is degrading to women, and by imposing criminal penalties designed to ‘end the demand’ for prostitution, women can freely escape the industry (Galbally, 2016).

Indigenous women, from exploitation at the hands of those who purchase sexual services (Department of Justice Canada, 2017). In fact, during the parliamentary hearings leading up to its passage, former Justice Minister Peter MacKay stated that this bill addresses the “root cause” of prostitution by criminalizing “predators, pimps, and johns who fuel the demand for this inherently dangerous activity” (as cited in Gillies & Bruckert, 2018, p. 88). However, PCEPA simultaneously criminalizes the “activities of those said to be exploited” (Galbally, 2016, p. 3). It thus applies and maintains the “traditional nuisance approach” to prostitution through the revised communicating law (Galbally, 2016, p. 3), and as we will observe in the following section, (re)constitutes sex workers as “both at-risk and risky” via three new criminal code provisions (Bruckert & Hannem, 2013, p. 48).

### ***Section 213(1): Stopping or Impeding Traffic***

In accordance with the *Bedford* ruling, the government repealed section 213(1)(c) of the *Canadian Criminal Code*. However, the other three provisions remained relatively intact. As it currently stands:

**213 (1)** Everyone is guilty of an offence punishable on summary conviction who, in a public place or in any place open to public view, for the purpose of offering, providing or obtaining sexual services for consideration, or  
**(a)** stops or attempts to stop any motor vehicle  
**(b)** impedes the free flow of pedestrian or vehicular traffic or ingress to or egress from premises adjacent to that place.

Defined in section 213(2) of the *Criminal Code*, a public place refers to any location that the public has access to “as of right or by invitation.” Moreover, PCEPA added a new provision that prohibits sex workers and clients from communicating in a public place in which children are known to be present (*Criminal Code*, 1985, s. 213 (1.1)). This includes communicating for the purposes of prostitution in any public place, including inside of a motor vehicle, “that *is* or is *next to* a school ground, playground, daycare centre, or religious institution” (*Criminal Code*, 1985, s.

213(1.1) [emphasis added]). These provisions are reportedly designed to “protect residents of communities from harassment by both those who purchase and those who sell sexual services” (Department of Justice Canada, 2017, para. 42). As such, sex workers can face criminal sanctions if caught communicating for the purposes of prostitution (Roots, 2022).

### ***Section 286.1: Purchasing Offence***

PCEPA introduced a new purchasing offence (s. 286.1), prohibiting anyone from “obtaining sexual services for consideration, or communicating in any place for that purpose.” This provision, which is the first of its kind in Canada, criminalizes the purchase of sexual services in both public and private locations. As such, anyone who communicates and purchases agreed-upon sexual services can face criminal sanctions (CASWLR, 2015a). It is crucial to note, however, that sex workers are immune from prosecution for this offence (as outlined in s. 286.5(1)(a) of the *Criminal Code*, otherwise known as the “immunity” provisions).

### ***Section 286.4: Advertising Law***

In addition to the purchasing offence, PCEPA enacted a new provision that prohibits advertising the sale of sexual services (s. 286.4). This law targets anyone who knowingly advertises the sale of another person’s sexual services, including newspapers, magazines, and websites. It also applies to business establishments that advertise the sexual services their employees offer, such as massage parlours and strip clubs (CASWLR, 2015b; Department of Justice Canada, 2023; Sterling, 2018). Sex workers can advertise the sale of their *own* sexual services (s. 286.5(1)(b)) and are thus immunized from criminal sanctions for committing or participating in the commission of this offence (s. 286.5(2)). These legal restrictions, however, impact sex workers’ occupational safety. For example, if businesses and online platforms are prohibited from publishing these advertisements, sex workers are unable to properly indicate the

services they do (and more importantly do *not*) offer and establish safer labour conditions (CASWLR, 2015b).

***Section 286.3: Procuring Offence***

PCEPA introduced a new procuring offence (s. 286.3), thereby repealing section 212 of the *Canadian Criminal Code*. The new law criminalizes:

**286.3(1)** Everyone who procures a person to offer or provide sexual services for consideration or for the purposes of facilitating an offence under subsection 286.1(1), recruits, holds, conceals, or harbours a person who offers or provides sexual services for consideration, or exercises control, direction or influence over the movements of that person.

In effect and enforcement, this law targets anyone deemed as having an “active involvement in the prostitution of others” (Department of Justice Canada, 2023, p. 4). This includes managers or employers that schedule and arrange appointments for sex workers to meet with clients (Durisin, van der Meulen, & Bruckert, 2018). As Kara Gillies and Chris Bruckert (2018) emphasize, section 286.3 further “criminalizes the sorts of supportive services provided by boyfriends, contractors, and peer facilitators” (p. 88). Although these individuals may not necessarily meet the legal standard as “causing” or “inducing” a person to sell sexual services, anyone who assists a person to engage in sex work and helps facilitate the purchase of sexual services can be charged for participating in the commission of this offence (Department of Justice Canada, 2023; Gillies & Bruckert, 2018). This law ensures that any person can be found criminally responsible for contributing to the exploitation of women beyond materially benefitting (s. 286.2) from the supportive services they may provide (Department of Justice Canada, 2023; Gillies & Bruckert, 2018).

### ***Section 286.2: Material Benefit Offence***

Accordingly, PCEPA introduced a new material benefit offence (s. 286.2), which modernizes living on the avails of prostitution (Durisin, van der Meulen, & Bruckert, 2018). Section 286.2 criminalizes anyone who materially benefits from the sexual labour of others. In practice, this impacts labour arrangements with third parties. Although the Supreme Court affirmed that a sex worker's inability to legally hire third parties and other management staff jeopardizes their safety, PCEPA upholds conventional wisdom that the relationship between sex workers and third parties are inherently exploitative. Exploitation, in this context, is primarily tied to the economic interest of maximizing profits through the sexual labour of another person (Department of Justice Canada, 2017). The law stipulates that, as long as sex workers are the only ones who materially benefit from the sexual services they offer, they are protected from criminal liability (s. 286.5(2)).

There are codified exceptions to the material benefit offence, many of which were established in the repealed provision or in previous case law. This includes relationships characterized by a "legitimate living arrangement" (s. 286.2(4)(a)) (e.g., family members), "legal or moral obligations" (s. 286.2(4)(b)) (e.g., caring for elderly parents), and/or in consideration for a service or good that is offered to the general public (s. 286.2(4)(c)) (e.g., those working in common service industries such as hair salons, housekeeping services, or public transportation). In an attempt to distinguish "beneficial or neutral relationships" between those that are "exploitative or otherwise harmful," PCEPA added a fourth exception (s. 286.2(4)(d)) that permits a good or service given *exclusively* to a sex worker "as long as the benefit is proportionate to the value, and that the person did not counsel or encourage the other party to engage in sex work" (Gillies & Bruckert, 2018, p. 89). This means that, in theory, sex workers can legally hire someone

to provide services such as a photographer or driver. However, the issue is that the law incentivizes police to target sex workers they believe work (or collaborate) with third-parties and question the motives of those who provide supportive services (Gillies & Bruckert, 2018). As a result, sex workers are routinely cast as victims who do not have the capacity to “determine who should receive their earnings” and for what reason (Gillies & Bruckert, 2018, p. 88). This provision, including the new procuring offence (s. 286.3), is further built upon the troubling assumption that sex workers lack the appropriate judgement to assess the nature of their relationships and the conditions of their own circumstances (Gillies & Bruckert, 2018).<sup>16</sup>

### **Prostitution Laws: Concluding Remarks**

Under PCEPA, sex workers, in principle, are not criminalized due to their status as prostitution’s primary victims (Snow, Steely, & Bensel, 2020). However, the revised communicating offence (s. 213(1)) demonstrates that the regulation of prostitution remains justified as a public nuisance. Therefore, the “victimization/criminalization continuum in relation to sex workers persists” (Roots, 2022, p. 35), as there is a sustained focus on protecting the community, and especially young people, from the perceived harms of prostitution. The current legal framework thus (re)produces the stereotype of sex workers as “risky” and damaging to communities (Bruckert & Hannem, 2013; Hannem & Bruckert, 2013). Moreover, through (paternalistic) policing efforts to address what is deemed an inherently dangerous activity, sex workers are simultaneously cast as harmful and harmed by others, in need of “rescue” from those said to exploit them (e.g., male customers, third-parties, and sex traffickers). However,

---

<sup>16</sup> It is crucial to note that prostitution laws in Canada, especially section 286.2 and 286.3 of the *Criminal Code*, are legally fused with human trafficking laws (O’Doherty & Millar, 2024; Roots, 2022). Katrin Roots (2022), a critical socio-legal scholar, states that “the protectionist approach of the new sex work laws [...] effectively enables the targeting of the sex trade through anti-trafficking legislation, as both [...] now aim to protect the imagined victim and criminalize the exploiter, whoever that is defined to be” (p. 36).

enforcement strategies targeting clients have had “little to no effect” on reducing experiences of violence in the sex trade (Krüsi, Belak, & Sex Workers United Against Violence, 2018, p. 220). The above review also shows how Canada’s legislative approach makes it challenging for sex workers to safely conduct their business without infringing upon any laws (van der Meulen & Durisin, 2018) and without police intervention (Roots, 2022). Notably, sex workers continue to “perceive police concern for their safety as a form of nuisance and police harassment” (Krüsi, Belak, & Sex Workers United Against Violence, 2018, p. 220). As many scholars and sex work activists argue, PCEPA is a simple rebranding of the three struck-down laws (Durisin, van der Meulen, & Bruckert, 2018; Sterling, 2018).

## **Chapter II: Literature Review**

While the legislative overview establishes the criminalized context in which sex workers navigate, it also reveals the troubling and problematic assumptions that underpin their design and enforcement. Legislative changes in the 1970s and 80s, particularly the re-entrenchment of prostitution as a social problem, marks a significant and critical time in which sex worker organizing was not only necessary, but urgent. As such, it is now time for us to examine how sex workers have historically responded to such discriminatory policies, structural stigma, and institutionalized understandings of their lives. To do so, this chapter relies on a small body of literature that explores the emergence of the sex workers' rights movement. This specifically entails a descriptive overview of the development of sex worker-led organizations in Canada and the resistance strategies employed to both challenge and navigate the shifting legislative and social landscape. It is through this discussion that the gap in the literature is revealed.

### **Chapter Outline**

This chapter begins with a brief overview of the broader social and political context within which the movement emerges. I then explore the notable rise of Canadian sex worker groups in the 1970s and 80s, and specifically examine how sex workers in Toronto, Vancouver, and Montréal came together to speak out against discriminatory treatment and bravely asserted themselves as political subjects worthy of dignity and rights. As the HIV/AIDS crisis rapidly emerged as a public health concern in the late 1980s, sex workers (as we saw in the introduction to this thesis) constituted themselves as “safe sex pros” through key advocacy efforts dedicated to health promotion and harm-reduction. Activism during this time catalyzed a tidal wave of sex worker groups; a momentum that continued into the late 90s and early 2000s. In fact, this is a significant time in which sex work groups initiated numerous community-based programs (many

of which still operate today) to help improve their working conditions and challenge criminalization. I conclude this chapter with a small body of literature that highlights how sex workers enact resistance through artwork, theatrical performances, and poetry. This highlights the relevance and importance of corporeal and/or embodied performance in the fight for sex workers' rights.

### **Sex Worker Resistance: The Feminist Push**

According to Ronald Weitzer (1991), the 1970s represents a period when marginalized groups began mobilizing against discrimination and structural inequality. As such, sex workers were emboldened by other disenfranchised groups that were speaking out against systemic oppression (Chateauvert, 2013; Weitzer 1991). In fact, Becki Ross (2018), a Canadian sociologist, states that sex workers initially organized alongside gay liberationists in the late 1970s. They were particularly unified in the fight against stigma and repressive policies that sought to control non-normative sexual behaviour(s) (Ross, 2018). Indeed, they were described as “logical allies” due to their shared marginal identity characterized by moral degeneracy and contagion (Ross, 2018, p. 256). However, as lesbian and gay activists achieved significant social and legislative victories (e.g., decriminalization of homosexuality, anti-discrimination bills, and LGBTQ+ caucuses within labour unions), “sex workers, especially cis and trans women of colour, faced new and more punitive legislation” (Ross, 2018, p. 260).

Discriminatory treatment of sex workers during this time was also likely informed by broader social values, particularly mainstream feminist objectives to protect women from sexual violence. In the late 1970s and 1980s, so-called “second wave feminists” sought to expose how experiences of discrimination and gender-based violence were shaped by broader systems of patriarchy (Comella, 2015). They pushed for legal reforms that would recognize the bodily

autonomy and agency of women; however, ironically never included the perspective of sex workers (Chateauvert, 2013). It would appear that the rights of female prostitutes were treated as almost antithetical to their anti-violence claims. In fact, radical feminists often discredited sex workers who emphasized their agency and choice to work in the sex trade (Chateauvert, 2013; Parent & Bruckert, 2012). They accused sex workers of having “false consciousness” (Parent & Bruckert, 2012), derived from the perspective that “prostitution is not, and never can be, a choice that women freely make” (Heath, Braimoh, & Gouweloos, 2016, p. 207).

These attitudes intersected with the anti-pornography movement in the late 1970s, as radical feminist groups put forth that pornography portrays women as sexual objects, thus contributing to gender discrimination and inequality (Brest & Vandenberg, 1987; Comella, 2015; MacKinnon, 2011; Perry & McElroy, 2021). Therefore, pornography, and by extension, the commercial exchange of sexual services, was viewed as a patriarchal construct for men to exercise power over women (Brest & Vandenberg, 1987; Perry & McElroy, 2021). As such, the circulating discourse emphasized the victimization of women, initiating a new era of moralizing agendas that positioned sex workers as “accomplices complicit in patriarchal oppression” (Cohen, 2019, para. 8). However, there are some notable contradictions within this radical feminist position, as (“prostituted”) women were viewed as too *powerless* to freely choose sex work, yet those who defended their labour were constructed as too *powerful* in reinforcing the exploitation of women (Chateauvert, 2013; Cohen, 2019). As a result, sex workers were not welcomed to participate (and were often deliberately excluded) from policy discussions regarding their lives (Chateauvert, 2013).<sup>17</sup> The ongoing experiences of political exclusion, stigmatization, and whorephobia

---

<sup>17</sup> In 1993, for example, on International Women’s Day, sex workers were barred from participating in a pornography conference hosted by the University of Chicago (Chateauvert, 2013). MacKinnon and colleagues even “reaffirmed their policy to not appear at any conference where prostitutes or pornographers would also speak” (Chateauvert, 2013, p. 198). To protest sex workers’ exclusion, the Scarlet Harlot (aka Carol Leigh) and members of the Sex Workers’

highlighted the need for the sex workers' rights movement. Indeed, as Margot St. James, the founder of the first sex workers' rights group in the United States proclaimed, "it [was] well past time for whores to organize" (Chateauvert, 2013, p. 66).

### **The Development of the Sex Workers' Rights Movement**

Historians put forth that the sex workers' rights movement first gained global attention in 1975 when sex workers protested at a local church in Lyon, France (Aroney, 2020; Bindel, 2017; Gall, 2016). The French sex workers organized a nationwide strike to protest ineffective legal protections, harassment, and police corruption (Aroney, 2020). The protests, which lasted approximately eight days, also directed attention to the unsolved serial murders of sex workers in the community (Aroney, 2020; Bindel, 2017).<sup>18</sup> However, it was not only French sex workers who were organizing around these and similar grievances. In the United States, Margot St. James founded Call Off Your Old Tired Ethics (COYOTE), the first sex workers' rights group in San Francisco, California in 1973.

COYOTE focused its attention on the need to decriminalize prostitution and remove the "whore stigma" attached to working in the sex industry (Chateauvert, 2013; Jenness, 1990; Weitzer, 1991). The media was integral to COYOTE's advocacy efforts, as it provided a platform through which St. James could generate public interest and support (Weitzer, 1991). As Melinda Chateauvert (2013) claims, St. James made a compelling case for decriminalization by consistently "[showing] the facts" on national television (p. 61). St. James also disseminated information and mobilized collective action through the organization's newsletter, *COYOTE Howls* (Jenness, 1990). Distributed to local feminist organizations and federal legislators, the newsletter presented

---

Action Coalition (SWAC) orchestrated "a piece of performance art" in the "courtyard visible through the lunchroom windows" where the meeting was taking place (Chateauvert, 2013, p. 198).

<sup>18</sup> Sex workers and sex work activists commemorate the French occupation on International Sex Workers' Day, also known as International Whores' Day, which is celebrated annually on June 2<sup>nd</sup> (Aroney, 2020).

a wide range of information to dispel common myths and educate the community on issues impacting the health and safety of sex workers (Jenness, 1990). In a strategic effort to expand its reach and influence, COYOTE collaborated with the National Organization of Women (NOW) to promote a *Kiss and Tell* campaign (Jenness, 1990). Designed to “strengthen lobbying efforts for the passage of the Equal Rights Amendment and secure public funding for abortion,” *COYOTE Howls* released the names of federal legislators who were frequent clients of sex work, yet voted in favour of discriminatory policies (Jenness, 1990, p. 411). The overarching goal was to assert political visibility, fight against the discriminatory treatment of sex workers, and make strong associations between sex work and other women’s rights issues (Jenness, 1990).

After receiving funding from San Francisco’s Gilde Foundation, COYOTE hosted its first National Hookers’ Convention and Hookers’ Ball in 1974 (Jenness, 1990). Featuring a panel of experts, COYOTE sought to facilitate dialogue between sex workers, activists, lawyers, and legislators (Jenness, 1990). From the mid-to-late 1970s, COYOTE formed partnerships with various organizations, hosted conferences, and organized protests, as well as initiated several class-action lawsuits in California (Jenness, 1990). These advocacy efforts attracted significant global attention, securing COYOTE’s presence and active participation in various international campaigns (Jenness, 1990). For example, between 1980 and 1986, COYOTE attended the United Nations Conference on Women, the International Committee for Prostitutes’ Rights, and the first World Whores’ Congress (Jenness, 1990). Despite challenges in achieving large-scale legislative reform, Jenness (1990) contends that COYOTE’s influence on the international movement for sex workers’ rights “solidified a genuinely alternative conception of prostitution” within dominant discourse (p. 409).

COYOTE paved the way for other groups to collectively organize, including some in Canada. For instance, Better End All Vicious Erotic Repression (BEAVER), a Toronto organization founded by Margaret Spore in 1977, was the first sex worker group to form in Canada (Beer, 2018; Brock, 1998; Gall, 2014). BEAVER's primary objective was to develop a compelling campaign for decriminalization and legitimize sex industry work (Brock, 1998). After two years of struggling to mobilize community support, BEAVER changed its name to the Coalition Against Street Harassment (CASH) and worked alongside local activists to raise awareness of discriminatory law enforcement practices and violence against sex workers in Toronto (Beer, 2018). Although the organization closed its doors in the early 1980s, it remains the pioneering force behind the sex workers' rights movement in Canada.

### ***Behind the Scenes of Collective Organizing: Legislative Changes in the 1970s***

Sarah Beer and Francine Tremblay (2014) note that various sex worker groups and collectives emerged throughout the 1980s. Some of the leading organizations to form in Canada were the Alliance for the Safety of Prostitutes (ASP) in 1982, and the Canadian Organization for the Rights of Prostitutes (CORP) in 1983.<sup>19</sup> These groups emerged to campaign against discriminatory law enforcement, hostile media attention, and repressive municipal regulation (Beer & Tremblay, 2014; Page, 2018; van der Meulen & Durisin, 2018). Indeed, sex workers were establishing a collective identity in a time of legislative changes and increased public attention surrounding their work (van der Meulen, Durisin, & Love, 2013). The *Hutt* decision, in particular, was a period in which street-based sex workers were navigating a shifting legal context. For instance, because of the reduced threat of being charged with solicitation (*Criminal Code*, 1985,

---

<sup>19</sup> CORP changed its name to Sex Professionals of Canada (SPOC) in 2002. In this chapter, I will refer to this organization as CORP since the advocacy efforts discussed predate the change in the organization's name.

s. 195.1), a growing number of sex workers began working outdoors to avoid bawdy-house convictions (McKenna, 2022; Scott, 2019).

At the same time, the increased visibility of street-based work revived moral panics and initiated aggressive anti-prostitution campaigns from middle-class residents (Brock 1998; Goodyear & Auger, 2013; Jeffrey, 2004; McKenna, 2022; O’Connell, 1988). In Vancouver, for example, Concerned Residents of the West End (CROWE) emerged to “purge prostitutes from the neighbourhood” and establish an ethos of respectability (Ross & Sullivan, 2012, p. 608). CROWE forged strong alliances with municipal politicians, influencing the development of “anti-hooker” bylaws and fines designed to displace sex workers (Ross, 2010; Ross & Sullivan, 2012).<sup>20</sup> With comparable events unfolding in Toronto, sex workers mobilized to resist actions that displaced them from gentrifying neighbourhoods (Beer, 2018; Beer & Tremblay, 2014; McKenna, 2022; Page, 2018; Ross, 2010; Ross & Sullivan, 2012; Scott, 2019).<sup>21</sup> For example, ASP and CORP organized protests, engaged in community outreach, and attended community meetings to speak out on issues facing sex workers (McKenna, 2022; Ross, 2010; Scott, 2019). In 1983 and 1984, ASP orchestrated the first public protests in Vancouver (Ross, 2010). Chanting, *Hookers Unite, Fight For Your Rights*, and carrying signs that read, *Harcourt Is Our Pimp*,<sup>22</sup> members of ASP advocated for their right to work safely and with dignity (Ross, 2010, p. 205).

A year later, ASP and CORP testified against the above-noted proposal of *Bill C-49* in Parliament, otherwise known as the “communicating law” (Ross, 2010; Scott, 2019). Both

---

<sup>20</sup> As mentioned in the preceding chapter (Chapter I), “anti-hooker” bylaws were eventually deemed unenforceable (Brock, 1998). However, other coordinated efforts orchestrated by resident groups and municipal governments to displace sex workers remained in full force and effect.

<sup>21</sup> ASP’s coordinated efforts to resist CROWE’s aggressive anti-prostitution campaign is captured in a 1984 documentary-film, *Hookers on Davie*.

<sup>22</sup> The message *Harcourt Is Our Pimp* refers to Mike Harcourt, the Mayor of Vancouver at the time. As Becki Ross (2010) writes, this statement is a “brilliant mockery of Mayor Harcourt’s hypocritical collection of fines for the state’s coffers on the backs of sex workers engaged in ‘illegal’ trade” (p. 206).

organizations emphasized the “catastrophic effect” the proposed law would have on the lives of street-based sex workers (Scott, 2019, p. 241). They argued that *Bill C-49*, if passed into law, would force sex workers to operate in more clandestine ways and thus exacerbate the already dangerous working conditions (House of Commons, 1985, p. 36) and impede sex workers’ ability to negotiate services with potential clients (Scott, 2019). To foreground their arguments against *Bill C-49*, members of ASP and CORP stated that the proposed law would fail to achieve its objective of eradicating street prostitution, and instead, would only displace sex workers into darker and more isolated areas and thereby increase their vulnerability to violence (House of Commons, 1985). Despite these concerted efforts, Becki Ross and Rachael Sullivan (2012) contend that sex workers “lacked the political, cultural, and legal capital” to mobilize an effective counter-campaign (p. 614). As such, residents’ groups “savoured their victory over sex workers” when the federal government passed *Bill C-49* in 1985 (Ross & Sullivan, 2012, p. 615).

As discussed in the legislative chapter, *Bill C-49* (s. 213.1(c)) prohibited sex workers and clients from communicating in a public place for the purposes of prostitution. This replaced the previous provision that solicitation must be “pressing and persistent,” allowing police to arrest sex workers and their clients for any conduct suggesting an offer to buy or sell sexual services (O’Connell, 1988; van der Meulen & Durisin, 2018). In practice, however, law enforcement also targeted any behaviour or activity facilitating the safe operation of street-based work. Members of CORP recount experiences of police using the communicating law to “disperse” sex workers who frequently worked together for security (O’Connell, 1988, p. 142). For example, prior to the new law, sex workers in Toronto frequently worked in pairs to screen clients by writing down their license plate number and other identifying information (O’Connell, 1988; Scott, 2019).<sup>23</sup> This

---

<sup>23</sup> This represents a period in which sex workers in Toronto were no longer able to safely “[communicate] important information about predators, safer sex, and the general news of the street” (Scott, 2019, p. 242).

informal, yet established network among street-based workers was effectively undermined by the increased presence of police.

When early enforcement practices failed to reduce street prostitution, Toronto police introduced new harassment techniques such as “street-sweeps” (McKenna, 2022; Scott, 2019), resulting in the displacement of numerous street-based sex workers.<sup>24</sup> Around the same time, law enforcement officers were utilizing other prostitution laws in the *Criminal Code* to arrest sex workers, including charging anyone found living on the avails of prostitution (s. 212(j)) (Lowman, 1989; Scott, 2019). CORP also began receiving phone calls from local sex workers reporting sexual assault and beatings (Scott, 2019). This, in addition to the brutal wave of violence against sex workers in Vancouver’s DTES (see Chapter I), generated a sense of urgency within the sex workers’ rights movement to fight for social and legislative change (McKenna, 2022; Scott, 2019).

ASP and CORP began delivering speeches at academic institutions to expose the devastating effects of the newly enforced law and the harms of criminalization more broadly (Scott, 2019). Moreover, in 1986, members of CORP attended the National Action Committee on the Status of Women’s (NAC) annual general meeting in Ottawa (Scott, 2019). The purpose was to encourage the NAC to recognize sex work as a work, mobilize around the repeal of the communication law, and oppose all legislation that targeted sex workers (Scott, 2019). That same year, CORP launched a *Stop Whore Bashing* campaign to challenge police entrapment practices and the subsequent arrests of sex workers on solicitation charges (Scott, 2019). This was part of a larger strategic effort to challenge the constitutionality of the communication law, as CORP’s campaign outreach urged sex workers to plead ‘not guilty’ to solicitation charges in court (Scott, 2019). These efforts to mobilize political action led to significant partnerships with academic

---

<sup>24</sup> In response, CORP organized a rally called, *Take to the Streets. Stop the Sweeps*.

researchers, lawyers, and allied organizations (Scott, 2019). A significant ally was Parkdale Legal Services, a community legal clinic in Toronto that defended sex workers with communication charges on a pro-bono basis (Scott, 2019). Similarly, in the late 1980s, Dr. Joseph Elliot Magnet, a law professor at the University of Ottawa, represented CORP during a constitutional challenge against the solicitation and bawdy-house laws (Scott, 2019).<sup>25</sup>

### ***Entering Centre Stage: The HIV/AIDS Epidemic***

The HIV/AIDS epidemic marked a significant turning point in sex work activism (Beer, 2018; Beer & Tremblay, 2014). Reminiscent of 19<sup>th</sup>-century medical discourse, public health officials identified sex workers as potential sources of HIV/AIDS transmission (Beer & Tremblay, 2014). This reinforced framings of “risk,” particularly sex workers as a threat to “good” and otherwise “respectable” Canadians. This forced the movement to reorient its focus to health promotion and HIV/AIDS prevention (Beer, 2010). One example of advocacy during this time was the launch of the *Prostitutes’ Safe Sex Project* (PSSP). Danny Cockerline, a member of CORP, created buttons, posters, and pamphlets on safe sex and distributed them to local social service agencies (McKenna, 2022; Walnut, 2000).<sup>26</sup> Other sex worker organizations received public health funding and contributed to HIV/AIDS prevention research. In fact, government funding became available for organizations “to engage in direct [and] meaningful involvement with marginalized communities deemed at risk of HIV/AIDS” (Beer & Tremblay, 2014, p. 287). While some sex

---

<sup>25</sup> This constitutional challenge came from a 1987 case, in which a Nova Scotia client defended solicitation charges on the basis that the law was in violation of the *Charter of Rights and Freedoms* (*R. v. Skinner*, 1987). When the case reached the Supreme Court of Canada, the government also requested the Court’s opinion on the bawdy-house laws (Scott, 2019). CORP was granted intervenor status and submitted a factum in support of the appellant, arguing that these sections of the *Criminal Code* violated *Charter*-enshrined rights to *Freedom of Expression* (s.2(b)) and *Freedom of Association* (s.2(d)) (Scott, 2019). The Supreme Court ultimately upheld the constitutionality of these laws, stating that, even if the communication law was deemed unconstitutional, the infringement would be justifiable and otherwise saved by section 1 of the *Charter* (*R v. Skinner*, 1990). Despite this legislative loss, Scott (2019) emphasizes the significance of having a sex workers’ rights perspective “on the record” (p. 258).

<sup>26</sup> After two years, PSSP received funding from Toronto’s Department of Public Health (Walnut, 2000).

work groups chose to operate without funding, activists claim that the HIV/AIDS crisis helped foreground the movement and “legitimize sex workers as [health] experts” (Beer, 2010, p. 31). However, sex workers were careful not to perpetuate the narrative that they are sources of contagion (Beer, 2010; Beer & Tremblay, 2014). Advocacy efforts began to include HIV/AIDS education to dispel the decades-long myth that sex work is “unsafe” and “unhygienic” (Scott, 2019).<sup>27</sup> Moreover, the HIV/AIDS crisis introduced new avenues for resistance and community building. We saw this, for example, in the introduction to this thesis when sex workers attended the 5<sup>th</sup> annual International AIDS Conference in Montréal for the first time to share their experiences, engage in policy discussions, and advocate for their rights through protest.<sup>28</sup>

In this time of intense legal repression and resistance, CORP recognized the need to establish a supportive network for sex workers in Toronto (Maggie’s, 2019). This led to the establishment of Maggie’s: Toronto’s Sex Workers’ Action Project, one of the longest-running sex worker-led organizations in Canada (Maggie’s, 2019).<sup>29</sup> Founded in 1986, Maggie’s was initially formed to provide peer-based counselling and resources through harm reduction programming (Maggie’s, 2019). In fact, *How to Have Safer Sex!*, a pamphlet produced as part of PSSP, was a key source of educational material distributed at Maggie’s (Walnet, 2000). As the

---

<sup>27</sup> In a 1988 panel discussion at the University of Ottawa, Scott (2019) “spoke about how sex workers were unjustifiably being scapegoated for the AIDS crisis” (p. 254). Scott (2019) even provided statistics to debunk these widely held myths at the time.

<sup>28</sup> In another example, the Global Network of Sex Work Projects (NSWP), a formal coalition of sex worker-led organizations across the world, was officially established in 1992 during the 8<sup>th</sup> International AIDS Conference hosted in Amsterdam (NSWP, 2025).

<sup>29</sup> This organization was originally named Toronto Prostitutes’ Community Service Project (Maggie’s, 2019). It was changed to Maggie’s: Toronto Sex Workers’ Action Project shortly after its official formation as an HIV/AIDS service organization (Maggie’s, 2019). The rationale to refer to the organization as Maggie’s was to “provide some discretion and safety to workers who referenced it” (Maggie’s, 2019, p. 222). In addition to other reasons inspiring its name, the organization reveals that it also serves as a “cheeky reference to Mary Magdalene from the Christian Bible” (Maggie’s, 2019, pp. 222-223).

organization grew in popularity among local sex workers, members expanded their focus and advocacy efforts to include court support and public education (Maggie's, 2019).

Collective action in Montréal emerged in the context of outrage at the city's proposal to make HIV/AIDS testing mandatory for sex workers (Generations of Stelliennes at Stella, l'aime de Maimie, 2019). Emphasizing their expertise in sexual health and STI prevention, sex workers promoted the necessity of experiential knowledge to effectively address HIV/AIDS concerns (Generations of Stelliennes at Stella, l'aime de Maimie, 2019). Community-based programming and peer outreach became available through public health funding, providing an opportunity for sex workers in Montreal to forge important partnerships with academic and public health researchers (Beer & Tremblay, 2014; Goodyear & Auger, 2013). For example, Claire Thiboutot, one of the founding members of l'Association Québécoise des travailleuses et travailleurs du sexe (AQTS), collaborated with local research organizations to explore HIV/AIDS prevention needs for street-based sex workers (Beer & Tremblay, 2014; Generations of Stelliennes at Stella, l'aime de Maimie, 2019). This research led to the development of *Project Stella*, a health service organization designed to provide resources and peer support to local sex workers (Beer & Tremblay, 2014; Generations of Stelliennes at Stella, l'aime de Maimie, 2019). Modelled after Maggie's, the founders of *Project Stella* sought to address the broader socio-economic factors that create and sustain poor working conditions in the sex trade (Beer, 2018; Beer & Tremblay, 2014). In 1995, *Project Stella* was officially known as Stella, l'aime de Maimie and run by and for sex workers (Beer & Tremblay, 2014; Generations of Stelliennes at Stella, l'aime de Maimie, 2019).<sup>30</sup>

Stella provided a safe space for sex workers to gather, communicate, and brainstorm strategies to make their work safer (Beer, 2018; Generations of Stelliennes at Stella, l'aime de

---

<sup>30</sup> I will now refer to this organization as Stella.

Maimie, 2019). Granted charitable status in 1998, Stella received funding to support its outreach initiatives and provided services that were previously unavailable to street-based sex workers in Montréal (Generations of Stelliennes at Stella, l'aime de Maimie, 2019). This included a *Bad Tricks List*, a communication tool for sex workers to warn each other about dangerous clients (Generations of Stelliennes at Stella, l'aime de Maimie, 2019).<sup>31</sup> Such lists were (and are) important tools that allow sex workers to help ensure their safety with each other and navigate the criminalized aspects of their work (Generations of Stelliennes at Stella, l'aime de Maimie, 2019).<sup>32</sup>

After five years of community outreach, Stella began to articulate the sex workers' rights perspective in public demonstrations (Generations of Stelliennes at Stella, l'aime de Maimie, 2019). Joining the Marche Mondiale des Femmes in the year 2000, Stella's first appearance on the "feminist stage" represents one of the few documented examples of performance in the academic literature (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 276).<sup>33</sup> For this event, Stella created an art installation that featured a large target symbol and arrows with the words "law," "police," "violence," and "prejudice" written on them (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 276). One member of Stella, wearing a "witch-like" costume (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 276), stood in front of the two-storey mural to illustrate how sex workers are the usual targets of social and legal repression (Crago

---

<sup>31</sup> The list continues to be published in *Stella's Bulletin*, though has since been renamed *List of Bad Clients and Aggressors* (Generations of Stelliennes at Stella, l'aime de Maimie, 2019).

<sup>32</sup> Stella has produced a variety of tools to promote the dignity and safety of sex workers. For example, in the early 2000s, Stella launched *Guide XXX* to provide key "information and references to help [sex workers] live and work in safety" (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 271). Around the same time, Stella created *Dear Client* pamphlets and *Dear John* letters for sex workers to "leave behind on the bedside table for clients at willing hotels and in-call agencies" (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 271). It was designed to provide safe sex tips and "demystify" prevailing assumptions regarding the lives of sex workers to their clients (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 271).

<sup>33</sup> The Marche Mondiale des Femmes is a global feminist march that fights to end violence against women. Stella's participation was strongly contested by anti-prostitution groups; however, Stella later received an award for their "audacity and determination" (Generations of Stelliennes at Stella, l'aime de Maimie, 2019, p. 276).

& Clamen, 2013). To further illustrate this point, sex workers stood behind mock prison bars and created a three-story banner that read, *We Don't Want Our Sisters, Our Mothers, Our Daughters, Friends, Our Girlfriends, Our Lovers In Prison* (Crago & Clamen, 2013, p. 159). This coordinated performance articulated a clear message, now serving as a historical example of strategies employed by sex workers to assert political visibility and resist state power. It is one of many actions that would later be celebrated at *Forum XXX* in 2005, an international conference that brought sex workers and select allies together from across the globe to share “experiences of advocacy, community-building, and fighting for legislative change” (Generations of Stelliennes at Stella, l’aime de Maimie, 2019, p. 279).

### **Collective Organizing in the Mid-1990s and Early 2000s**

Recognized for its revolutionary community building, the sex workers’ rights movement has seen a significant growth in the number of sex worker organizations (e.g., Providing Alternatives Counselling and Education Society (PACE Society) and Prostitutes Empowerment Education and Resource Society (PEERS Victoria)). Notably, some groups emerged when particular vulnerabilities were identified. For example, the Sex Workers Action Network (SWAN)<sup>34</sup> and Butterfly (Asian and Migrant Sex Workers Support Network)<sup>35</sup> were formed after HIV/AIDS outreach revealed a diverse range of issues impacting sex workers with precarious immigration status (Lam, Sun, & Milliken, 2019; Mackenzie & Ham, 2019). Given the limited representation of these experiences in the movement, these organizations emerged to build community, provide legal support services, and educate the public on the impact of anti-trafficking initiatives in Canada (Lam, Sun, & Milliken, 2019; Mackenzie & Ham, 2019). SWAN and Butterfly continue to conduct research, develop peer-informed programs and training services,

---

<sup>34</sup> SWAN was founded in 2004 and is based in Vancouver.

<sup>35</sup> Elene Lam founded the Toronto organization in 2014 and is currently run by-and-for migrant sex workers.

collaborate with allied organizations, as well as organize conferences and community forums (Lam, Sun, & Milliken, 2019; Mackenzie & Ham, 2019).

These sex worker organizations, among others discussed in this chapter, have a longstanding foundation in providing meaningful resources that are based on experiential knowledge and input (Beer, 2018). Indeed, the pioneering actions of early sex worker-led organizations helped shape the strategic landscape of the contemporary movement. The early to mid-2000s, in particular, stands out as a time in which sex worker groups were building strong partnerships with various community organizations, academic researchers, and government institutions. This led to significant outcomes, including the growth of community-based programs and empirical research conducted by and with sex workers. Scholars have documented a few of these advocacy efforts, particularly in the context of the sex workers' rights movement in Vancouver (see for example Arthur, Davis, & Shannon, 2013; Davis & Bowen, 2019; Paterson, 2019). Some of these projects include *Living in Community* and *Developing Capacity for Change*, two 2006 initiatives that focused on improving the health and safety of sex workers (see Davis & Bowen, 2007; Gibson & Goldstein, 2007). These and other successful programs developed during this time brought sex workers, residents' groups, local law enforcement agencies, business associations, and community groups together to explore ways to increase sex worker safety (Arthur, Davis, Shannon, 2013; Davis & Bowen, 2007; Gibson & Goldstein, 2007). While the movement in Vancouver largely emerged in the context of the Pickton serial murders, these efforts were associated with broader movement goals to have sex workers at the forefront of political discussions and decision-making processes (Davis & Bowen, 2019).

In the early 2000s, a significant partnership was formed with Pivot Legal Society (Pivot), a not-for-profit human rights organization in Vancouver. It is comprised of lawyers, policy

consultants, campaign developers, and management staff committed to social and legal justice. Since opening its doors in 2001, Pivot has been a vocal legal advocate for decriminalization and produces research in collaboration with sex workers to “challenge legislation, policies, and practices that undermine human rights” (Pivot, n.d.). One of the most notable projects to come from this partnership was a 2004 report, *Voices for Dignity: A Call to End the Harms Caused by Canada’s Sex Trade Laws*. This project gathered 94 legally sworn statements written by sex workers to examine the harms of criminalization and provide policy recommendations (Pivot, 2004). In the report, Pivot (2004) clarifies that these statements were officially notarized as affidavits in order to have the sex workers’ rights perspective in official records. This allowed these statements to be submitted in parliamentary hearings and committees, as well as evidence in strategic litigation and other lobbying efforts (Davis & Bowen, 2019; Pivot, 2004). Indeed, the report was presented to the *Subcommittee on Solicitation Laws of the Standing Committee on Justice and Human Rights* (SSLR) in 2005 (Johnson, 2014).<sup>36</sup> This is one such example of how sex workers deployed the tools of the legal apparatus to push for legislative change.

Moreover, partnerships with academic researchers and allied organizations, such as Pivot Legal Society, helped establish the necessary infrastructure for sex workers to engage in direct political action. This includes access to resources and the skills necessary to mobilize legally against prostitution laws in Canada (Beer, 2018). These alliances also helped facilitate a process through which sex workers’ knowledge and expertise could be found within mainstream research. The growth of empirical research conducted by and with sex workers has played an integral role in establishing the legitimacy of the movement and their capacity to advocate for their rights in

---

<sup>36</sup> The mandated objective of the SSLR was to review prostitution laws in Canada. According to Lewis, Shaver, and Maticka-Tyndale (2013), it was the first time that “sex workers were officially invited as witnesses and were included as members of research teams to testify about the effects of Canadian law and policy on their lives” (p. 200).

political spaces. Sex workers continue to foreground and strengthen their relationships with allied organizations. For example, sex worker groups have joined the Canadian Alliance for Sex Work Law Reform (CASWLR), a coalition group established in 2012. This organization serves as a legal advocacy network for sex workers to engage in law and policy discussions. The CASWLR has published research, produced info-sheets and “advocacy guides,” as well as filed submissions to Parliament and engaged in legal action. In fact, as of 2022, the CASWLR is representing current and former sex workers in a constitutional challenge to several provisions in PCEPA.<sup>37</sup> These legal advocacy efforts not only inform the public on issues impacting sex working communities, but also strengthens sex workers’ capacity “to engage with the legislative process” (CASWLR, n.d., para. 1).

### **Art and Performance in the Sex Workers’ Rights Movement**

The above review shows that the sex workers’ rights movement is built upon self-determination and community-based initiatives to destigmatize sex industry work and advocate for the right to work safely and with dignity. Sex workers forged a collective identity by engaging in community outreach, orchestrating media campaigns, attending conferences, organizing protests and rallies, as well as engaging in strategic lobbying efforts and initiating constitutional challenges. However, sex workers build community and advocate for their rights and safety in a variety of ways. They challenge stigmatic assumptions through storytelling, spoken and written poetry, music, artwork, theatrical performances, and even filmmaking (Chateauvert, 2013). In 1997, for example, Annie Oakley, a sex worker and sex work activist, launched the first *Sex Workers’ Art Show* (SWAS) in Olympia, Washington. Characterized as an evening of

---

<sup>37</sup> For more information or to receive the latest update(s) on the case, visit: <https://sexworklawreform.com/our-constitutional-challenge-to-pcepa/>

entertainment and education, “SWAS was an all-in-one cabaret, burlesque, drag, multimedia, and art show,” with performances specifically aimed at demystifying prevailing assumptions about their lives (Chateauvert, 2013, p. 201). A couple years later, in 1999, sex workers in the U.S. organized the *Sex Worker Film & Arts Festival* in San Francisco. Over the past twenty-five years, the festival has orchestrated live annual events and movie screenings, including some Canadian films such as *Prowling By Night* (1990) and *A Safer Sex Trade (Trailer)* (2006). The festival has since become a “vibrant venue for performances, workshops, visual arts, political organizing, [and] skills sharing” among sex workers and sex work artists (San Francisco Bay Area Sex Worker Film & Arts Festival, n.d., para. 1). In a Canadian context, in 2002, Mirha-Soleil Ross, a trans sex worker, artist, and animal rights activist, produced and starred in a short film, *Yapping Out Loud: Contagious Thoughts From An Unrepentant Whore*. In a series of seven monologues, Ross criticized anti-prostitution discourse and campaigns, highlighting its negative impact on sex working communities. Another example is *Sex Worker Truth & Archetype* (2014), “a documentary-based art installation that seeks to challenge society’s perception of a sex worker,” namely through “intimate video interviews and photography” (Beaver Hall Gallery, n.d.). It first premiered at *Nuit Blanche*, a sex worker arts festival that has been organized annually in Toronto since 2006 (Beaver Hall Gallery, n.d.; Tigchelaar, 2019).

Of course, creative forms of activism in the sex workers’ rights movement goes beyond short-film documentaries and art festivals. Sex workers in Canada also resist and challenge stigmatic assumptions through theatre productions, poetry, zines, and artwork. While these forms of resistance have received very little attention in academic research, there is a persistent theme and discursive thread found across examples of creative activism. That is, sex workers not only challenge criminal justice policy and discriminatory treatment at the local level, but also broader

discourses that shape public perceptions of sex work. This includes, for example, stigmatic assumptions of sex workers as morally corrupt, (sexually) deviant and threatening to the nuclear family, “risky” (especially as it pertains to sexually transmitted diseases), and thus harmful to communities. These framings exist in tension with other discursive constructions of sex workers as victims that must be saved and/or rescued from the industry (Bruckert & Hannem, 2013). As outlined in Chapter I, these competing (and often contradicting) views are deeply embedded in criminal justice policy and have been “reiterated in judicial reasoning” (Bruckert & Hannem, 2013, p. 48). Sex workers, therefore, (both independently and collectively) demystify these stereotypical assumptions by sharing stories and experiences working in the sex trade, ultimately reframing how their lives and labour are understood. *Project ArmHer*, a collective of Sudbury sex workers, have come together and engage in “creativity workshops” for this very purpose (Tigchelaar, 2019, p. 24). Indeed, Tracy Gregory, the founder of Sex Workers Advisory Network Sudbury (SWANS), states that *Project ArmHer* “was born out of the frustration of systematically being silenced, spoken for and about, and purposefully excluded from conversations about our work and our lives” (Nipissing University, 2018, para. 2).

Another notable example is, *I am a Sex Worker*, a YouTube video that Feminist Advocating for Rights and Equality for Sex Workers (FIRST), a national coalition that defends sex worker rights,<sup>38</sup> produced in 2010. The video sought to “remind people that sex workers are just ordinary people who come from all walks of life and have many interests, including raising a family” (Shannon, Zangger, Arthur, 2019, p. 72).<sup>39</sup> This demonstrates how sex workers engage in creative

---

<sup>38</sup> FIRST, founded in 2007, is a Vancouver organization that has a long history of organizing public forums, hosting conferences, attending key events, and co-producing research on the impacts of prostitution laws in Canada (Shannon, Zangger, Arthur, 2019). In collaboration with sex worker-led organizations and allied community groups, they have developed a number of different programs that “both champion sex workers as agents and recognizes the barriers they face” to social justice (MacDonald et al., 2013, p. 171).

<sup>39</sup> Unfortunately, it appears that the video has since been removed or taken down off YouTube.

strategies of resistance to communicate opposition to dominant (and problematic) understandings of their lives, as well as advocate for their right to be treated with respect and dignity. Surprisingly, there is an insufficient amount of academic research that locates such expression as an entrenched strategy within the sex workers' rights movement. Although we see glimpses of orchestrated performances during protest events in the literature, including Stella's art installation at the Marche Mondiale des Femmes in 2000, such acts have not been the subject of sustained interest or comprehensive scholarly analysis. This is particularly important to explore as it is "this tremendous creativity, dedication, and energy [that has] kept the movement alive" (Chateauvert, 2013, p. 14).

Moreover, it is crucial to make clear that this thesis also attends to acts of resistance that may not be self-evidently creative. Perhaps we can call it the *hidden creativity* of sex worker rights activists, which comes out in the way they present themselves at protest events. At first glance, their appearance and attire may not be recognized as resistance, but as my research will show, it is one of many ways that sex workers and sex work activists challenge the stereotypical assumptions outlined above. These are the performative features of resistance that have received even less, if any, attention in the academic literature. As such, there is a demonstrated gap in how sex workers articulate messages of dissent and enact resistance in "corporeal terms" at protest events (Butler, 2015, p. 83).

### **Chapter III: Theoretical Framework**

The literature review demonstrates that sex workers have long engaged in resistance. Of particular significance, it is evident how the strategies and tactics employed correspond to their shifting discursive construction. Indeed, sex worker rights activists challenge oppressive and reductive discourses which frame prostitution as a public nuisance, moral offence, and violence against women; putting forth that sex work is a legitimate form of labour. Once again, this thesis aims to examine how they resist troubling perceptions in “corporeal” terms (Butler, 2015, p. 83). This approach, however, requires moving beyond conventional understandings of resistance which tend neglect the significance of the non-verbal and embodied nature of protest. As a result of this identified gap, the objective of this chapter is to build a conceptual framework that puts resistance literature in conversation with key theoretical insights from Michel Foucault and Judith Butler.

#### **Chapter Outline**

I begin this chapter by introducing the concept of resistance, and discuss the diverse areas of focus and debates within the field. This overview provides a necessary point of departure for theorizing sex worker resistance. However, because this project seeks to move beyond traditional analytic approaches, the second section of this chapter engages with Foucault’s formulation of power to better understand the forms resistance can take. Central to this discussion is his concept of discourse and the ways in which subjects are discursively produced. While Foucault’s concept of power and discourse remain crucial, his theoretical insights do not necessarily attend to the subject and their capacity to resist such discursive constructions. To address this theoretical gap, I build upon the works of Judith Butler and specifically their earlier work in gender formation and critique of performativity. Butler helps us understand the capacity (and opportunities) for subjects (e.g., sex workers) to resist their ascribed identities. I also turn to Butler’s (2015) later work,

specifically *Notes Toward a Performative Theory of Assembly*, to theorize resistance as a coordinated and embodied political action. These concepts, when applied with Foucault's insights, provide a comprehensive lens through which to analyze and interpret corporeal resistance in the sex workers' rights movement. Indeed, I build upon the respective works of Foucault and Butler to theorize sex worker resistance as a *performance of the subject-self*.

### **Not All Resistance Looks Alike**

Historically, studies of resistance have focused on large-scale acts of rebellion and violent forms of resistance to state power and oppressive governmental regimes (Hughes et al., 1995; Pivan, 2012; Rubin, 1996). Within this body of research, resistance manifests in the form of organized strikes, political uprisings, and violent confrontations with authority (Clement, 2016; Lilja, Baaz, & Vinthagen, 2015). In this framing, resistance becomes almost synonymous with rebellion, conceptualized as a "conscious political action designed to subvert or overthrow state power" (Crewe, 2007, p. 257). It is thus the transformative and emancipatory quality of resistance strategies that has established the scholarly interest in observing actions that may initiate social and political change.

However, contemporary understandings of resistance have also been developed through ethnographic research exploring resistance strategies among incarcerated populations (see for example Crewe, 2007; Bosworth, 1999; Bosworth & Carrabine, 2001; Munn & Bruckert, 2010). In this context, resistance manifests in the form of riots (Carrabine, 2005; Useem & Kimball, 1989), escape attempts, and hunger strikes (Case, 2019; McEvoy, 2001). While Kieran McEvoy (2001) states that there are varying motivations behind such acts of resistance, interviews with "politically motivated prisoners" reveal that they saw escaping as a duty to fight for their freedom (p. 48). They specifically described it as a way to communicate to the prison guards that "they

cannot imprison their struggle” (McEvoy, 2001, p. 49). Fran Buntman (2019) similarly found that incarcerated individuals may engage in resistance to contest the assumption that they suddenly become “dominated, disciplined, and docile” within carceral spaces (p. 215). Fundamentally, then, resistance carries symbolic value and can thus take place regardless of the outcome (e.g., unsuccessfully escaping). It is equally important to note that, while individual resistance strategies in prison have been examined, Melissa Munn and Chris Bruckert (2010) observe that prisoner resistance is often carried out “in the interests of the collectivity” (p. 145).

This perspective is consistent with definitions of resistance outside of a carceral context. As such, social movement theorists Charles Tilly (1978), Doug McAdam (1982), and Sidney Tarrow (1998) understand acts of resistance as a complex political process driven by collective action aimed at challenging structures of power. Within this body of research, scholars have examined politically articulated forms of resistance (Baaz, Lilja, & Vinthagen, 2017). There is a particular focus on the strategic nature of resistance, concentrating on how disenfranchised groups mobilize to make their struggles known (see for example Stephan & Chenoweth, 2008). Often times, the focus is on the political, social, and economic conditions that enable or constrain the success of a social movement (see for example: Case, 2019; Naeglar, 2021). Those who adopt this approach typically rely on the theoretical traditions of resource mobilization theory to analyze the effectiveness of resistance strategies (Mathieu, 2003; Weitzer, 1991). Ronald Weitzer (1991) follows this approach in his investigation of the sex workers’ rights movement in the United States. In particular, Weitzer (1991) assesses COYOTE’s strategic efforts, some of which were discussed in Chapter II, and declares the movement a failure for not having generated the resources necessary to achieve legislative change. While some scholars reject making such conclusions, questioning

the criteria used to determine what constitutes as *effective* collective action (Weitz, 2001), this theoretical approach is widely accepted.

### ***Everyday Resistance***

In recent years, resistance scholars have started to examine individual actions and behaviour that occur in “everyday life” (Awad, Wagoner, & Glaveanu, 2017; Rubin, 1996; Vinthagen & Johansson, 2013; Weitz, 2001). These practices of resistance are often “more hidden and less visible” than politically organized acts (Baaz, Lilja, & Vinthagen, 2017, p. 16). James Scott (1985) first introduced this form of resistance in *Weapons of the Weak: Everyday Forms of Peasant Resistance*. Scott (1985) attends to how marginalized populations navigate power structures and confront oppressive systems in their daily lives, including for example, “foot-dragging, false compliance, pilfering, or sabotage” (p. 29). It specifically refers to far more covert and subtle acts that may or may not be recognized as resistance (Law & Bruckert, 2016; Scott, 1985). As such, Scott’s (1985) theoretical contributions have encouraged scholars to look beyond large-scale acts of resistance, and instead, examine everyday actions and behaviours that are carried out day-to-day and that do not appear to be confrontational. A relevant example of this is a 2016 study that examines the ways in which erotic dancers (covertly) resist managerial authority while working in strip clubs (Law & Bruckert, 2016). Here, it is important to highlight Scott’s (1990) argument that resistance occurring outside the view of those in power creates a “hidden transcript.” This demonstrates the capacity of “powerless groups” to express dissent and share grievances amongst each other (Scott, 1985, p. 29). This means that, while individuals may appear to be compliant (through the “public transcript”), they still meaningfully challenge authority and assert their agency (Scott, 1990).

Importantly, he also puts forth that disenfranchised groups may “manage to insinuate their resistance in disguised forms into the public transcript” (Scott, 1990, p. 136). While debates persist on what should be rightfully considered as “everyday resistance” and thus worth academic inquiry, Scott (1985) encourages scholars to consider how these acts can accumulate over time and thus facilitate social and political change. Indeed, as Mikael Baaz, Mona Lilja, and Stellan Vinthagen (2017) observe, organized forms of resistance may encourage everyday resistance (and vice-versa). To elaborate on the relationship between the everyday and the collective, I turn to the example of ‘no shaving’ as a form of resistance. This practice exposes the deeply ingrained social expectation that women should be hairless, and while this can be an individual act of resistance when a woman simply refuses to comply with this social expectation, Breanne Fahs (2022) points out how it can also serve as a collective feminist statement. In her book, *Unshaved Resistance & Revolution in Women’s Body Hair Politics*, Fahs (2022) specifically focuses on organized protests in China, where activists took to the streets and publicly displayed their body hair to challenge gender norms. This reflects Scott’s (1990) assertion that disenfranchised groups not only resist power in the everyday and intimate spaces of the body, but also extend these acts of resistance into the public sphere.

Rose Weitz (2001) has also contributed to this understanding of resistance in her examination of how women resist dominant cultural ideologies and “seek power” through particular hairstyles (p. 669). Notably, the findings reveal that the participants both “resist and accommodate” mainstream norms and carry performative elements shaped by intersecting social relations that dictate how one should present themselves in specific settings (Weitz, 2001, p. 675). Both Weitz (2001) and Fahs (2022) conceptualize the *body* as a site of resistance, which is particularly crucial to highlight as it underscores the relevance and importance of attending to the

subtle and often overlooked expressions of agency. Anna Johansson and Stellan Vinthagen (2016) similarly put forth that resistance can be done through “the use of clothes, shoes, bags, jewelry, and certain colours” (p. 426). However, research in this area is largely underdeveloped.

### ***Resistance Revisited***

In considering the diverse ways resistance has been understood and applied, the concept covers “anything from violent to non-violent, confrontational to circumventing, deconstructing to reconstructing, productive to hindering, individual to collective, [and] accommodating to enforcing” (Baaz, Lilja, & Vinthagen, 2017, p. 12). It is within this context that Baaz, Lilja, and Vinthagen (2017) describe resistance as a “common, [yet] unusual concept” (p. 12). The common-sense understanding of the term is that resistance is an enactment of *opposition* to state power. This framing, however, becomes a bit more complicated when considering “everyday” acts of resistance, as it broadens the scope to individual and collective behaviours that may escape notice (Baaz, Lilja, & Vinthagen, 2017; Chaudhary & Valsiner, 2017; Hollander & Einwohner, 2004; Scott, 1985) and “[chip] away at power in almost imperceptible ways” (Rubin, 1996, p. 241). As a result, the definition of resistance is rather inconsistent, and the proper conceptualization of the term remains to be a point of contention between scholars in the field. However, as Rebecca Raby (2005) writes, “how we conceptualize resistance hinges on our differing theoretical understandings of power and subjectivity” (p. 152). As such, I will now develop my own understanding of resistance, starting with the concept of power.

### **Power**

Power is conventionally conceptualized as authority *over*. This suggests that power manifests as control exercised by dominant groups, including government institutions, *over* subordinate groups. Resistance can thus be understood as marginalized members of society coming

together, attempting to overthrow government authority and/or the capitalist system (Baaz, Lilja, & Vinthagen, 2017; Bosworth & Carrabine, 2001; Gengler, 2012; Hollander & Einwohner, 2004; Piderit, 2000; Rubin, 1996). Key theoretical thinkers such as Foucault have revolutionized this understanding of resistance by offering a renewed look on power. Foucault (1972, 1978) advances several propositions, namely through distinguishing his understanding of power from what it is *not*. As such, Foucault (1978) contends that power is *not* something that one possesses, nor is it concentrated or imposed by individuals or government institutions. Put simply, he rejects the notion that power merely subjugates individuals. Characterized as “sovereign power,” Foucault (1978) writes:

This form is the law of transgression and punishment, with its interplay of licit and illicit. Whether one attributes to it the form of the prince who formulates rights, of the father who forbids, of the censor who enforces silence, or of the master who states the law, in any case one schematizes power in a juridical form, and one defines its effects as obedience. Confronted by a power that is law, the subject who is constituted as subject – who is ‘subjected’ – is he who obeys. To the formal homogeneity of power in these various instances corresponds the general form of submission in the one who is constrained by it, whether the individual in question is the subject opposite the monarch, the citizen opposite the state, the child opposite the parent, or the disciple opposite the master. A legislative power on one side, and an obedient subject on the other (p. 85).

There are two essential points to unpack here. First, Foucault (1978) makes a clear argument against the traditional “top-down” approach to power, which positions it as a coercive force. Richard Lynch (2011) best articulates Foucault’s critique when he writes that the (traditional) view of power “entails a binary system of [what is] permitted and forbidden, legal and illegal” (p. 17). This would suggest that domination is achieved by compelling subjects to obey laws through force and fear (Foucault, 1978). This sketches a similar binary logic wherein subjects are positioned as either obedient rule-followers or rule-breakers that must be disciplined. For Foucault (1978), this obscures the complexity of power relations. Secondly, the traditional view of power offers limited conceptual space to theorize resistance. If power solely operates in the

form of domination to produce disciplined subjects, the traditional conception of power constrains both the subject's capacity to resist (beyond strictly oppositional forms) and the *possibilities* of resistance.

However, Foucault's (1978) insistence that we "break free" from this monolithic view of power has led to significant criticisms (p. 90). For instance, many scholars have criticized Foucault for failing to consider the role of the law in exercising power over individuals (see Poulantzas, 1978). Other scholars have attempted to resolve this issue by arguing that it is a fundamental misreading of Foucault's work, asserting that he does not reject the exercise of centralized forms of power (e.g., the law) (Alam, Dwyer, & Roots, 2023; Feder, 2011; Lynch, 2011). Indeed, Foucault acknowledges in several of his writings that such modes of domination and subjugation have "persisted to the present" (Foucault, 1978, p. 89; see also Foucault, 1979, 1980). As such, Foucault (1978) is calling our attention to "new mechanisms of power" that are "irreducible to the representation of law" (p. 89), suggesting that, to view power as a solely negative and repressive force would be to neglect its omnipresence (Foucault, 1978, 1979). In this way, Foucault (1978) conceives power as a diffuse and decentralized network that "comes from below" (p. 94). Rather than absolute power *over* marginalized subjects, Foucault (1978) views power as *relational*. It permeates all social interactions (Lynch, 2011), acting as "both an effect and condition of other relations and processes" (Law & Bruckert, 2016, p. 251).

### ***Power, Knowledge, and Discourse***

Foucault's (1978, 1980) understanding of power necessitates a discursive process through which subject positions are produced, stabilized, and rendered governable. Indeed, Foucault (1980) writes:

...There are manifold relations of power which permeate, characterize and constitute the social body, and these relations of power cannot themselves be established, consolidated

nor implemented without the production, accumulation, circulation and functioning of a discourse. There can be no possible exercise of power without a certain economy of discourses of truth which operates through and on the basis of this association (p. 93).

Discourse can thus be seen as “ways of referring to constructing knowledge about a particular topic of practice” (Hall, 1997, p. 6). This contributes to an understanding of what is normal and abnormal, resulting in dominant groups engaging in the “naming and shaming” of marginalized subjects (Weitzer, 2018, p. 720). In turn, “these claims, ideas, and images about a certain group come together to create a specific discourse related” to them (Swan, 2022, p. 95). Consider, for example, how dominant (legal) discourses have framed sex workers as “both at-risk and risky” (Bruckert & Hannem, 2013, p. 48). As Bruckert and Hannem (2013) point out, “these knowledges of risk become a part of our corporate understanding and stereotype of marginalized persons” (p. 26). In short, power does more than simply tells us what we can and cannot do. It is for this reason that Foucault (1978) states that power is not solely repressive, but *productive*. It produces rationalities that define and enforce norms of acceptable behaviour. Fundamentally, then, discourses perform a strategic and tactical function (Foucault, 1978; McHoul & Grace, 1993).

For power to be established and maintained, there must be a continuous flow of discourse that creates what we accept as truth (Foucault, 1978, 1980). Butler’s (1990) theory on regulatory practices and its role in the formation of gender is particularly relevant here. They emphasize that norms and social conventions require ongoing repetition through discourse, legal systems, and everyday interactions to sustain their authority and legitimacy (Butler, 1990). In this respect, both Butler (1990) and Foucault (1972, 1978) argue that dominant discourses are not neutral conveyors of truth. Instead, it can only “treat” truth, meaning that it creates frameworks and conditions under which truths are produced, circulated, and accepted (McHoul & Grace, 1993). Therefore, power is

pervasive because it organizes and manages the subject through compliance and normalization (not just through criminalization and punishment) (Foucault, 1978).

However, despite the pervasive nature of hegemonic order, Foucault (1978) maintains that discourse “must be [conceived] as a series of discontinuous segments whose tactical function is neither uniform nor stable” (p. 100). To this end, discourse(s) can be a “hindrance, a stumbling-block, a point of resistance and a starting point for an opposing strategy” (Foucault, 1978, p. 101). Importantly, because subjectivity is not fixed, deviations from dominant discourse is possible (Butler 1990; Foucault 1978). This highlights the productive nature of discourse, revealing how it also facilitates the *possibilities* of resistance. However, it remains important to avoid posturing resistance as simply reactionary to power, and instead, view it as being “in a reciprocal and constitutive relationship” (Law & Bruckert, 2016, p. 251). As such, this understanding of power extends our acknowledgement to the capacity for people to resist their subject positions in diffuse or almost nebulous ways. As Foucault (1978) famously asserts, “Where there is power, there is resistance, and yet, or rather consequently, this resistance is never in a position of exteriority in relation to power” (p. 95). In short, for the purposes of this study, I adopt Foucault’s assertion that resistance renders power visible.

### ***Discursive Events***

Foucault (1978) proclaims that there is a “plurality of resistances,” which include subtle or dispersed acts that occur in everyday life (p. 96). We are constantly active (unknowingly or knowingly) in relations of power; however, in the first volume of *The History of Sexuality*, Foucault (1978) uses metaphors such as “points,” “knots,” and “focuses” to describe when resistance may be particularly visible. Protests, for example, are moments in which disenfranchised groups publicly gather to express discontent. Based on Scott’s (1985) thinking, protests can be a

constellation of grievances that happen in everyday life and specifically curated for the “public transcript.” Foucault (1972) uniquely describes this as a “discursive event.” While this thesis is primarily interested in how sex workers and sex work activists resist in non-verbal terms, it is important to acknowledge that Foucault (1978) draws attention to the discursive field within which statements are situated. Accordingly, Foucault (1978) argues that one must consider the discursive conditions that make certain statements possible (or thinkable). However, this thesis does not apply Foucault’s concept of discourse to explore the conditions within which statements are made possible and thus articulated in the movement. Instead, his understanding of discourse is used (and essential) to recognize that messages of dissent are situated within a complex field of power relations. In other words, my understanding of resistance rests upon the broader recognition that the messages sex worker rights activists bring forth are tied (and can never be severed) from the movement’s social and political context, as well as its historical roots.

As such, Foucault’s work establishes the necessary foundation to understand the strategies and tactics used by sex workers to resist. These concepts are especially useful, as it reveals the ways in which discursive frameworks shape and influence the messages that are being articulated in the sex workers’ rights movement. Furthermore, Foucault’s contributions open theoretical space to consider how resistance is *materialized* by the disciplined or marginal subject. This is a crucial element to this thesis because, as Bruckert and Hannem (2013) contend, “it is through the lives and interactions of individual people that these struggles are played out and competing knowledges are created” (p. 28). However, Foucault does not explicitly theorize the ways in which individuals challenge and actively participate in these discourses, or how they engage in the production of alternative discourse via symbolic and corporeal actions. In order to better locate the subject (i.e.,

sex workers) within this broader understanding of power, discourse, and resistance, I draw upon the theorizing of critical feminist scholar, Judith Butler.

### **Performativity**

Influenced by the thinking of Foucault, Butler (1993) contends that subjects are discursively produced. This refers to the productive and discursive *effects* of normative rules and regulations, and even criminal justice policy. Butler (1990) further maintains that “there is no political position purified of power, and perhaps that impurity is what produces agency as the potential interruption and reversal of regulatory regimes” (p. xxviii). To understand this from the perspective of the marginal subject, we must turn to Butler’s (1990) primary work on gender, identity, and performativity. Butler (1990) fundamentally challenges the notion that there is a clear, binary distinction between male and female, arguing that gender identity is socially and culturally constructed. This is most explicitly discussed in *Gender Trouble*, one of Butler’s most influential works. In it, Butler (1990) argues that gender identity is “tenuously constituted in time; an identity instituted through a stylized repetition of acts” (p. 191). Gender is thus constructed through a set of normative structures that ascribe meaning, which in turn, dictate “appropriate” expressions of gender. Butler (1990) argues that the “stylized repetition of acts” is best understood as a performance of gender (p. 191).

Like Foucault, Butler (1990) posits that a person’s culturally constructed identity is maintained discursively through the repetition of societal norms and the regulatory force of language and discourse. This process involves the internalization of norms that dictate how individuals *should* perform their identities (Butler, 1990, 1993). This suggests that individuals continuously create and express gender identity through bodily gestures, appearance, and interactions with others (Butler, 1990). Institutions and social practices thus reinforce these norms,

making certain identities appear natural and stable (Butler, 1990). Many scholars have relied on both Butler and Foucault to better understand this process. For instance, Johanna Oksala (2011) argues that “our experiences of sexuality are in fact always the result of specific cultural conventions and mechanisms of power and could not exist independently of them” (p. 90). Butler (1990) affirms, though, that individuals are not “passive recipients” of these norms (p. 11). Rather, they actively interpret and perform gender in various ways. Other scholars have applied this view and see power as discursive relation, “[acting] in a relatively autonomous way and produces subjects just as much as, or even more than, subjects reproduce it” (McHoul & Grace, 1993, p. 22). Haugaard (2022) expresses a similar point of view, asserting that:

Such individuals are not effects of power but active agents negotiating various subject positions, acting strategically to occupy positions that have as much authority as possible and, furthermore, constantly trying to expand the authority of those subject positions (p. 354).

### ***Where Do Sex Workers Fit?***

Now turning our attention to the discursive construction of sex workers, I draw upon Butler to understand how they *perform* their ascribed identity, which reflects common stereotypes that have pervaded across time. For example, sex workers have long been framed as sexually deviant, threatening to families and the moral order, as well as viewed as engaging in an inherently risky activity that damages communities. Articulations of such risk and immorality have changed over time, depending on prevailing social attitudes and varying levels of community tolerance (see Chapter I and II). However, it is this constructed (or ascribed) identity that reveals power relations. Sex workers do not fit neatly within gender norms, as their existence challenges social conventions dictating acceptable female conduct. In considering this, resistance can manifest in a multitude of ways beyond what resistance literature has shown. Critically, as Oksala (2011) observes in Foucault’s writing, “the body represents the possibility of resistance against such discourses and

techniques of power” (p. 93). This is the theoretical space that Foucault provides, though does not attend to. Butler (1990, 2015), therefore, provides the necessary entry point into understanding how sex workers resist and negotiate their subject positions through bodily expressions of protest. In this thesis, I am using Butler (1990, 1993, 2015) to analyze how sex workers *perform* particular stereotypes, or alternatively how they *perform* their personal identity, to demystify problematic assumptions (which, again, have been formulated and maintained through dominant discursive practices). In this respect, Butler’s theorizing expands our understanding of the ways in which resistance, like power, is productive. As such, through resistance, disenfranchised groups can generate alternative ways of thinking or viewing their work (Scott, 1985, 1990).

### **Social Practices of Resistance**

Resistance scholarship has also drawn attention to the spatial and material dimensions of collective action, which refers to the physical spaces that resistance is enacted and made visible (Baaz, Lilja, & Vinthagen, 2017). These studies highlight how space itself becomes a site of political struggle and expression. Building on this, Butler (2015) helps us understand how resistance is not only located in space but constituted through the presence of those who gather. Butler (2015) specifically suggests that, when bodies assemble together in public, they do more than simply occupy space. They perform a political act that both transforms and animates the material environment, disrupting normative spatial arrangements and making visible those who are often marginalized or excluded (Butler, 2015). Butler’s (2015) insight on the practices of collective action, particularly in *Notes Toward a Performative Theory*, is essential as this thesis engages with acts of resistance that may appear to fall within common-sense understandings discussed above. As such, Butler (2015) enables a sustained focus on the corporeal nature of protest.

## Defining Resistance

Corporeal and/or embodied forms of resistance is especially significant when considering the competing and often contradictory identities ascribed to sex workers. Once again, this thesis aims to investigate the ways in which sex workers (both collectively and individually) enact resistance and articulate messages of dissent through symbolic communication and *performance of the subject-self*. With this focus on the subtle, creative, and symbolic acts of resistance, this thesis defines resistance as an individual or collective process (Cresswell, 1996; Hollander & Einwohner, 2004; Rubin, 1996; Scott, 1985), involving acts (verbal, non-verbal, symbolic, or physical) or “patterns of actions” (Johansson & Vinthagen, 2016, p. 418) to confront structures of power (Rubin, 1996), negotiate subjectivities (Gregg, 1993) and reject subordination, as well as challenge “the ideologies that support [such] subordination” (Weitz, 2001, p. 670).

## Chapter IV: Methodology

This chapter outlines the methodological approach I employed for the collection and analysis of the visual material. I begin with a description of visual content analysis; the qualitative research method I used to address this study's research questions: (1) How do sex worker rights activists articulate messages of dissent and challenge dominant discourse through symbolic communication and embodied performance during protests? (2) In what ways do sex worker rights activists resist stereotypical assumptions and troubling public perceptions via their appearance and attire? (3) What messages are being conveyed in the sex work activist images? And how might the corporeally enacted messages reinforce, expand, and/or offer new insights into the written claims found on protest signs? Following this, I unpack the data collection process and the challenges I encountered gathering my sample. The final section of this chapter outlines the coding process and identifies four central themes to emerge from the visual data. I conclude by discussing key methodological considerations that guided me throughout the research process.

### **What is Visual Content Analysis?**

Visual content analysis is a method used to systematically examine and analyze visual materials such as photographs, videos, films, advertisements, and artwork (Emmison, 2004; Emmison & Smith, 2000; Leavy, 2007; Rose, 2001). This method involves the description and analysis of the *content* of visual material (Short, 2019). Marcus Banks (2007) suggests visual methodologies are best suited for exploratory research, as such it offers a "range of alternative paths of inquiry" (p. 60). It is also an appropriate approach when examining a large corpus of archival material (Parry, 2020). This is, in part, because visual content analysis involves describing the contents of the image, which are easily discernible and often non-negotiable (Bell, 2004; Parry, 2020; Rose, 2001). Imagine, for example, an image of a person sitting on a park bench. While

theoretical interpretations may vary, it can be said with confidence that this is an image of a person sitting on a park bench. Accordingly, visual content analysis reveals what is present in the data (Bell, 2004; Parry, 2020). This is a necessary empirical starting point to address my research questions, as I require a methodological framework that supports a systematic and descriptive investigation of the visual material. However, because this is a qualitative research study, visual content analysis necessitates interpretation.

### ***A Brief Historical Overview: An Interpretative Methodology***

Over the last few decades, scholars have drawn attention to the ways in which meaning is constructed and conveyed via visual technologies. More specifically, the growing interest in visual research is largely attributed to the potential to uncover “implicit ideological or cultural messages” (Emmison, 2004, p. 246). Critical feminist scholars, for example, have employed visual content analysis to examine representations of women in advertisements, magazines, television, and film (see for example Kim, Bay-Cheng, & Gin, 2022). Within this body of research, feminist scholars analyze the visual media under investigation to challenge gender stereotypes and identify what they perceive to be troubling assumptions (Kim, Bay-Cheng, & Gin, 2022). These and other scholarly investigations are often guided by Erving Goffman’s frame analysis, a theory which helps explain how news media shapes public perception and understanding of social issues through visual representations (Heuer, McClure, & Puhl, 2011; Nelson, Oxley, & Clawson, 1997; Pietrass, 2009). To my knowledge, this is the first research study to employ a visual content analysis to examine sex work activist images, and more specifically, to consider the corporeally enacted messages produced by the subject(s) captured in the visual material. At the same time, this project aligns with the broader aims of visual research by exploring “the wider political, economic, and

gender systems in which [the subjects] are embedded” (Emmison, 2004, p. 249). According to Rose (2001), it is important to:

... Think about the visual in terms of the cultural significance, social practices and power relations in which it is embedded; and that means thinking about the power relations that produce, are articulated through, and can be challenged by, ways of seeing and imaging (p. 3).

As such, in any visual content analyses, it is imperative to have an “in-depth contextual understanding and theoretical foundations” to make an accurate interpretation of why the visual elements under inquiry may be “culturally and politically significant” (Parry, 2020, p. 354). Stuart Hall (1997), a renowned cultural theorist, emphasizes that scholarly investigations are simply interpretations of visual culture. He specifically calls attention to how analyzing visual material is “bound to be [an] interpretative” process, as there is “no single or correct answer to the question, ‘What does this image mean?’” (Hall, 1997, p. 9). Although visual material is praised for “rendering the world in visual terms” (Rose, 2001, p. 6), Michael Ball and Gregory Smith (1992) firmly state that “photographs do not straightforwardly reflect reality” (p. 14). To avoid making claims of ‘truth,’ it is necessary to develop a methodology that allows the researcher to justify their interpretation of visual material (Rose, 2001).

### ***Interpreting Visual Material: Visual Content Analysis and Michel Foucault***

The emergence of visual methodologies coincided with a cultural and discursive turn in the 1970s (Drew, 1998; Rose, 2001); a time when the social sciences and humanities began to shift their focus from material structures and institutions to language, meaning, and discourse as central to understanding power, knowledge, and social relations (Rose, 2001). While this shift was influenced by the thinking of several key theorists, for the purposes of this research, I reflect on Foucault’s contributions. In doing so, I seek to demonstrate how my methodological approach and theoretical framework are in a “reciprocal” relationship (McCotter, 2001, p. 4).

Discourses, as defined in the theory chapter, “are ways of referring to constructing knowledge about a particular topic of practice” (Hall, 1997, p. 6). To better understand discourse beyond a purely linguistic concept, the work of Lynda Nead (1988) is essential. In *Myths of Sexuality: Representations of Women in Victorian Britain*, Nead (1988) examines the representation of women in visual culture, specifically how “the wife, the adulteress, the fallen woman, the prostitute, and the female philanthropist” are discursively constructed (Bristow, 1990, p. 282). In her work, Nead (1988) conceptualizes art as a form of discourse, thus contributing to the “production and reproduction [of] power” (p. 4). Given that discourses appear in so many forms, it is necessary to consider how they connect or reveal broader power structures (Rose, 2001). In other words, no single image or text stands alone. It is shaped by the context of other things to which it is related (Hall, 1997; Rose, 2001). This is particularly important to keep in mind when examining visual data, as resistance captured in the visual material does not exist outside of the power/discourse nexus, nor is it “articulated [through] practices that are external to it” (Foucault, 1972, p. 164). Based on this understanding, it is crucial to further acknowledge that my interpretation and analysis of the visual data is shaped and informed by the prevailing dominant discourse surrounding sex workers.

### **Data Collection and Sampling**

Jon Prosser and Dona Schwartz (2004) emphasize the importance of having a deep understanding of the historical, social, and political context in which the visual data was produced. This component is particularly important when images are *found* via archival or online searches, compared to images *taken* by researchers during ethnographic work (Prosser & Schwartz, 2004). This is, at least in part, because images that are *found* often exclude the context in which they were

produced (Banks, 2007). Therefore, I spent the first several months reviewing the literature.<sup>40</sup> During this time, I also began to think through where I might find the visual data, a reflexive practice I maintained throughout the research process.

The primary aim was to collect all publicly accessible visual material relevant to my research question. However, due to the absence of a comprehensive archival collection of sex work activist images, my search began with uncertainty with the type and quantity of visual data available. To navigate the unknown and to accommodate the diverse forms discourse can take (Nead, 1988), I was initially open to various types of media including photographs, videos, and artwork. I adopted multiple strategies to locate the visual material, establishing the following criteria for inclusion: (1) All visual material must depict a sex work activist event that took place in Canada<sup>41</sup> and (2) must fall within the time period of 2013-2023.<sup>42</sup> This 10-year time period was chosen in order to capture sex work activism following the *Bedford* decision in 2013, the subsequent proposal of *Bill C-36*, and ascension of PCEPA in 2014. It is this legislative landscape that the sex workers' rights movement currently navigates.

Early on in the data collection process, I received access to an archive assembled by Jelena Vermilion, the director of Sex Workers' Action Program (SWAP), an organization located in Hamilton, Ontario.<sup>43</sup> This archive, stored on MEGA, an online file sharing platform, contains a range of visual materials such as photos, videos, short films, and documentaries, as well as news media coverage dating back to the 1980s. Additionally, it contains PDF copies of stickers and posters, along with educational materials produced by sex worker-led organizations across Canada.

---

<sup>40</sup> The data collection process was conducted over the course of several months, starting in January 2023 and ending in October 2023.

<sup>41</sup> Given the number of international events and limited resources available to identify the participation of Canadian sex worker organizations, I narrowed my search to protests that were clearly identified as having took place in Canada.

<sup>42</sup> The final criterion was established by ensuring that the date was provided in the photo's description or caption.

<sup>43</sup> My thesis supervisor forwarded me the link via email in January 2023.

As I began reviewing the available material, I decided to narrow the scope to images, ensuring a systematic methodological approach. Given this renewed focus, only the images in the archive were reviewed for inclusion. Although most images fit the specified time-frame, only thirty-one photos were identified as capturing sex workers' rights events in Canada.

While the visual material I obtained was limited, the sex work archive proved to be a useful resource throughout the data collection process. Indeed, I utilized the archive as a key resource to find additional sources and to learn more about specific sex worker events in Canada. This facilitated the identification of additional search terms, which I used to expand and refine the range of keywords for my Internet searches via Google. For example, I came across a PDF copy of a sticker promoting the 2022 Red Umbrella March. This prompted me to conduct a Google search of the event, leading me to the website of Triple-X Workers' Solidarity Association of B.C, a sex worker rights group in Vancouver. Following a thorough review of their website, I found sex work activist images taken at Red Umbrella March events in 2013, 2014, 2015, and in 2023. Notably, in 2020, Triple-X uploaded an embedded YouTube video on their website, showcasing a slideshow of images taken at previous protest events.<sup>44</sup> I took a screenshot of every image in the video, only excluding images that were previously found and already included in the dataset.

I also found visual material on Flickr, an online photo sharing application that allows photographers to share, edit, organize, and geotag their photos. I discovered Flickr through Triple-X Workers' website, as they provided a link to an album with 70 photos of the 2016 Red Umbrella March taken by photographer, Sally T. Buck. Initially, I downloaded all 70 images onto my personal computer. However, after completing my search, I revisited the images and refined the selection by removing duplicates or images that captured the same subject from different angles

---

<sup>44</sup> To ensure easy access for future retrieval, I accessed the video directly on YouTube and saved the URL on my personal computer.

(provided that there was no variation in the content being depicted) (Rose, 2001). The revised sample (N=14) remained representative of the event, ensuring that the quality and depth of the subsequent analysis would not be impacted (Rose, 2001). At this point, my approach to collecting the data closely resembled a snowballing technique. As a result, as each new source pointed me toward other relevant visual material, I was able to progressively build a comprehensive dataset, despite the scattered nature of the archival records.

The sample was also drawn from a thorough review of social media networking sites such as Instagram and X (formerly known as Twitter). I reviewed the accounts of Stella, Maggie's, Butterfly, SWAN Vancouver, PEERS Victoria, PACE Society, Sex Work Autonomous Committee (SWAC), SWAP Hamilton, and Triple-X Workers.<sup>45</sup> I specifically searched for images posted or shared by these organizations, resulting in a large amount of data. I also browsed through retweeted content (on X) and photos that these organizations were “tagged” in (on Instagram). Although this sampling approach did not yield a high volume of results, I deemed it necessary as it offered the potential to find images taken by attendees who protested alongside event organizers. To ensure that the photos collected through this method met this study's criteria, I reviewed the posting date and caption. If the date and location of the protest were unclear, the image was not immediately discarded. Instead, I evaluated contextual clues, such as the text on protest signs or banners in the image, to determine its relevance. Images were discarded only when there was insufficient information to confidently identify that the event had taken place in Canada and during the specified time period.

---

<sup>45</sup> I compiled a list of sex worker organizations to review their social media accounts based on those discussed in the literature review (see Chapter II). As I became aware of other sex worker organizations (e.g., SWAC), I updated the list to include them.

Furthermore, using a combination of sex work activism-related terms, I utilized the Google search engine to locate sex work activist images. I searched: *sex worker rights Canada, sex work resistance, sex workers protest in [major Canadian city] or [at location]*. Refining the search results to display only “News” and “Images,” I found photos featured in Canadian news articles, specifically reports of sex workers protesting the proposal of *Bill C-36* and the subsequent enactment of PCEPA in 2014. These articles sometimes contained one or two images of the protest or public demonstration in question, which were then carefully reviewed to ensure alignment with this study’s inclusion criteria. In most cases, however, news articles only contained video footage of the event.

### ***Finalizing the Data Set***

By diversifying my search strategies and consulting multiple platforms, I aimed to capture a comprehensive collection of images accessible to the general public. After completing the initial data search, I conducted two additional reviews of each source to ensure comprehensive coverage of photographs spanning the 10-year period. By the third review, I found no new images, confirming a rigorous and systematic approach to collecting a complete archive (N=143) (Rose, 2001). Given the comprehensive search across multiple platforms, Table 4.1 provides a clear breakdown of the total number of images collected from each consulted source. Table 4.2 organizes the total number of images collected by year.

**Table 4.1**

#### *Data Collection by Source and Quantity*

| Source                  | Number of Images |
|-------------------------|------------------|
| Sex Work Archive (MEGA) | 9                |
| Triple-X Website        | 20               |
| Flickr                  | 16               |
| YouTube (via Triple-X)  | 7                |
| Instagram               | 42               |
| X                       | 42               |

|               |     |
|---------------|-----|
| News Articles | 7   |
| N=            | 143 |

**Table 4.2***Data Collection by Year*

| Year  | Number of Images |
|-------|------------------|
| 2013  | 7                |
| 2014  | 13               |
| 2015  | 13               |
| 2016  | 14               |
| 2017  | 14               |
| 2018  | 13               |
| 2019  | 14               |
| 2020* |                  |
| 2021  | 6                |
| 2022  | 25               |
| 2023  | 24               |
| N=    | 143              |

\*I did not find any protest images taken in 2021, likely due to the COVID-19 pandemic and public health restrictions prohibiting public gatherings at the time.

***The Challenges***

Despite the large corpus of visual data, a major challenge throughout the data collection process was navigating the “dead-ends.” For example, while reading *Sex Work Activism in Canada: Speaking Out, Standing Up* (2019), I discovered that, in 2015, a sex workers’ rights group in Sault Ste. Marie organized a *Take Back the Night* campaign.<sup>46</sup> I tried repeatedly to find images taken at this event, and unfortunately, I was not successful. Moreover, when reviewing the social media accounts of sex worker organizations, I noticed that many had posted flyers promoting events and encouraging attendance among their followers. In an attempt to find images of these

<sup>46</sup> *Take Back the Night* (TBTN) is an international campaign to end sexual violence against women. While the first TBTN protest is uncertain, the event gained momentum in the late 1970s as women started marching and “reclaiming” spaces they had felt unsafe (Women & The American Story, n.d.). Following an anti-pornography conference in 1978, protesters in San Francisco organized a TBTN protest and marched the streets of adult entertainment districts (TBTN, 2025). This effort was associated with broader “feminist” claims that pornography is sexual violence against women. Since then, sex worker advocacy groups have organized TBTN marches to raise awareness and protest violence against sex workers. In this way, sex workers have rebranded TBTN to show that sex workers’ rights are also women’s rights.

events, I conducted a Google search, inputting the event, year, and respective sex worker organization (e.g., National Day of Action, June 2023, Maggie's Toronto). However, this generated little to no results. In another example, having become aware of Flickr as a potential source, I used their search engine to locate other visual content and deployed a range search terms, including *sex work*, *sex worker protest*, *sex work activism in Canada*, *sex workers rights movement*, and *sex worker resistance*. This only resulted in the collection of two additional images taken in 2013. I also consulted *The Archive and Special Collections* at the uOttawa library and found a variety of legal materials, conference records, newspaper clippings, and early advocacy materials produced by BEAVER, CORP, and ASP. However, these materials did not match this study's criterion for inclusion and was thus not included as part of the archive.

Another challenge emerged from social media. While social media has made it easier to access visual material, it comes with its own issues. On Instagram, users can only filter search terms by "Accounts," "Reels," "Audio," "Tags," and "Places." When searching *sex work activism*, only the "Tags" filter generated results, with close to 100 posts. This required me to sift through a large amount of material that did not match the aims of my study. Thus, searching specific accounts (e.g., SWAC or Stella) was the most effective and promising option for finding relevant material. I also encountered the additional challenge of navigating content moderators. On Flickr and X, for instance, I received "sensitive content warnings" or was notified that certain images were "no longer available." In short, the lack of permanency proved to be a challenge in locating visual material. When reviewing my search and sources to ensure comprehensive coverage, I noticed that many photos were removed. It is unclear whether it was the owner of the account or content moderators who deleted these photos; and for what reason it was done. This was particularly

challenging for me to navigate, as I became hesitant to conclude my search for visual data. I had to come to terms with how visual material may always appear and disappear in digital spaces.

Finally, it was incredibly difficult for me to exclude the videos I found during the data collection process. As previously mentioned, I found many video clips and short-film documentaries showcasing sex worker resistance in Canada. Key items include: (1) Press interviews with Terri-Jean Bedford, specifically video footage of her testimony at the Senate; and, of course, (2) *Our Bodies, Our Business* (2016), the 24-minute documentary of sex worker rights activists protesting at the 5<sup>th</sup> annual International AIDS Conference in 1989. Considering my research aims, I was especially drawn to the humour, symbolic messages, and attire observed in each video, particularly Terri-Jean Bedford's dominatrix outfit and iconic riding crop. These videos represented a *performance of resistance*, and as a result, were hard to abandon. While researchers have used visual content analysis to examine videos and/or audio-visual recordings, it does involve a different methodological approach (see for example: Heath, Hindmarsh, & Luff, 2010; Loizos, 2000; Rose, 2004) and thus went beyond the scope of this project. I discuss these videos as a potential area for future research in the conclusion of this thesis.

### **Coding Process**

Once I finalized the dataset, I printed all 143 photos in colour and assigned, by hand, identification numbers to each photo (i.e., 001-143). I then conducted a comprehensive overview of the entire dataset to gain familiarity with its contents. To initiate the coding process, I created a table in Excel with key columns: *Image ID* (assigned to each photo), *Description* (the context of each image, if known), *Applied Codes*, including whether it was a *posed* or *action*-based photograph, and when applicable, the *Message(s) on Protest Signs*, to document the written text appearing in the images. Each protest sign was given a unique ID under this column, while

remaining linked to the corresponding image (e.g., 0-01-A). If a photo captured more than one protest sign, the IDs followed this format: 0-01-A, 0-01-B, 0-01-C and so forth. This allowed for a systematic approach to coding the protest signs, ensuring the textual data remained part of a unified analysis with the visual elements.

The first set of codes were developed and informed by the insights gained from the literature review. The goal was to identify key actions and visual elements that carry symbolic meaning in public demonstrations organized by sex worker groups. For instance, particular actions such as “chanting” and “marching” were frequently mentioned in the literature (see Ross, 2010). Other key items like “signs,” “banners,” “feathered boas,” and “face coverings” were also identified as significant and symbolic elements in sex work activism (see *Generations of Stelliennes at Stella, l’aime de Maimie*, 2019; Paterson, 2019). Based on these recurring descriptions, a priori codes were developed, thus following a deductive coding procedure (Leavy, 2007).

Similarly, in the second phase of coding, a priori codes were developed based on the theoretical concepts guiding this study. However, I employed a flexible approach within the deductive framework, adapting my initial codes based on the actual content and patterns that emerged in the data. For example, I first applied a broad ‘dress’ code, later refining it based on observed patterns relating to what sex worker rights activists were *actually* wearing. As such, I gradually established a specific set of ‘dress’ codes during the second and third phase of coding. “Cop costume” and “leather gloves,” for example, were specific ‘dress’ codes to emerge from the data. This approach helped ensure that the conceptual framework used in this study could, indeed, be found within the data (Thorne, 2016).

In considering my research question and the exploratory nature of this project, the third phase of coding involved inductive coding procedures, otherwise known as a “data-driven” approach (Leavy, 2007). This refers to codes that emerge from the data itself (Leavy, 2007; Thorne, 2016). While the decision to use both deductive and inductive coding procedures depends on the research project, Patricia Leavy (2007) highlights that these approaches are often “employed ‘to degrees’ or in combination of one another” (p. 243). In fact, a combined approach is used in nearly all qualitative visual content analyses (Ball & Smith, 1992). As Michael Emmison and Phillip Smith (2000) write:

It is data-driven in the sense that we aim to capture the phenomenal features of whatever visual materials we use in our investigations and make these the object of our analysis. It is theory dependent in the sense that it is only through a conceptual framework that a given object can become data for investigation (p. 4).

Paula Reavey and Katherine Johnson (2017) expand on this, asserting that because visual content analyses involve the researcher’s interpretation of the data, it must be theoretically grounded. However, it is equally important to consider patterns that emerge from the data itself. In light of this, I followed an open-coding procedure for all 143 images. This led to the development of new codes that captured nuances not covered by the initial coding scheme. For example, I began coding specific hand gestures (e.g., raised fists or peace signs), noisemakers or instruments (e.g., cowbells, whistles, and Indigenous hand-drums), and speech amplifying tools (e.g., megaphone, microphone, and speaker). These and other inductive codes generated significant findings relating to key theoretical concepts guiding this project. In this respect, the coding scheme was informed by my research questions and review of the relevant literature, while responsive to the actual content of the data.

In addition to the three phases of coding described above, a supplemental coding process was undertaken to enhance the depth of analysis. On a separate Excel sheet, I began coding the

text on each protest sign. The primary aim was to engage with the specific messages or key words on each sign. I also coded symbols found on each protest sign (e.g., a hand-drawn red umbrella or a pinned bra) and identified specific references to court cases (e.g., the *Bedford* case), legislation or legal frameworks (e.g., PCEPA and/or the Nordic Model), and political figures (e.g., Canada's former conservative Prime Minister, Stephen Harper), as well as references to pop-culture. The only pre-determined codes were the *type* of message, indicating whether it was a *statement* (a clear and declarative sentence), *slogan* (a short, catchy, or otherwise memorable phrase) or *demand* (a call-to-action). This component to the coding scheme was endeavouring to uncover the broader discursive context. After applying these codes, I reviewed the codebook to ensure relevance and consistency within the data. This involved refining codes by either merging or splitting codes to enhance clarity. During this process, I removed irrelevant or redundant codes.

### ***Creating Categories and Themes***

Once I finalized the codes, I organized them into six distinct categories. From there, four dominant themes emerged relating to the corporeal and/or embodied nature of sex worker resistance: (1) Past and Present Fight for Sex Workers' Rights; (2) Red-Light Revelations: Colour as a Marker of Resistance; (3) Dress to Resist; and (4) Performing the Subject-Self, Reframing the Narrative. I discuss each theme and their respective subthemes in the following chapter. In regard to the messages conveyed in the protest signs, the findings revealed two key messages: (1) Criminalization Harms, Not Helps; and (2) Sex Worker Rights Are Not Exceptional Rights. These findings are discussed in Chapter VI.

### **Interpreting the Sex Work Activist Images: A Reflexive Practice**

This study did not require approval from the Research Ethics Board (REB); however, this does not mean that there are no ethical issues to consider. Indeed, despite the unobtrusive quality

of visual methodologies (Leavy, 2007; Reinharz, 1992), it is crucial to recognize that analyzing visual material “can never be a neutral enterprise” (Banks, 2007, p. 73). That said, I engaged in a reflexive process throughout this endeavour, thoughtfully considering my interpretation of the visual data. Despite my conscientious efforts to understand the historical, political, and social context in which these images are situated, I recognize that I am imposing an interpretation. This component in visual research has been addressed by many scholars, though the focus has typically been on the ethics of researcher-generated images (Banks, 2007). Unlike images taken with the consent and participation of subjects, *found* images come with limited context, leaving researchers to interpret meanings that are not necessarily complete (Prosser & Schwartz, 2004). Peter Loizos (2000) shares this concern, stating that the “information may be *in* the photograph, but not everyone is equipped to recover it in full” [emphasis added] (p. 96). Accordingly, “any interpretation the viewer makes will not ‘exhaust’ the significance that might be attributed to the photograph” (Ball & Smith, 1992, p. 18).

Recognizing these concerns, I challenged myself to be as rigorous and respectful as possible throughout the research process. Put simply, this project is not engaged in the quest to uncover “hidden” meanings or discourse (Foucault, 1972). To do so would presuppose that there is a concealed layer of meaning that can be definitively discovered (Foucault, 1972). Rather than a limitation, as some scholars might suggest (see Hansen et al., 1998; Rodrigues, 2018), it reflects a deliberate and ongoing process of acknowledging the contextual and partial nature of meaning, (Ball & Smith, 1992), especially as it pertains to researcher positionality (Munn, 2014; Singh, Richmond, & Burnes, 2013), and the importance of claiming interpretative authority over the visual data (Thorne, 2016). To elaborate on this, I present three examples of how I approached the data and navigated this process throughout the analysis.

The first example is a *posed*-image featuring three sex work activists at the Red Umbrella March in 2018 (see Figure 4.1 below). Two of the subjects present as female and are wearing vibrant red wigs. All three individuals are wearing red glasses; however, the person in the middle appears to be wearing regular eyewear, while the other two are wearing sunglasses. Additionally, two of the three subjects are dressed in red fitted tank tops. Notably, one of them has a five-dollar bill visibly tucked in their shirt (see subject on the right of the image). I reviewed this image several times, exploring how this component might be interpreted, and more specifically, whether it should be included in the analysis. I questioned: What meaning can be derived from this five-dollar bill? Does its placement hold cultural significance? For instance, I considered how this may be a potential reference to common strip club activities, such as patrons placing dollar bills in strippers' underwear. Within this lens, I conceptualized the five-dollar bill as a playful and provocative statement, showcasing the act of receiving money for providing a sexual service. Other interpretations may include the purchase of sexual services, a criminal offence under PCEPA, which has faced heavy scrutiny by the sex worker community and their clients.

**Figure 4.1**



I further reflected on the theme of that year, which was to remember sex workers who received fines for “keeping houses of prostitution” and were “marched to court” by the City Council in 1888 (Triple-X, 2018; see also Mooney, 2018). Therefore, the five-dollar bill may symbolize the act of having been fined. Of course, it is also reasonable to assume that this was the only way for this person to secure their belongings. Given the seemingly endless possibilities, I questioned whether the five-dollar bill should be included as a unit of analysis (on this topic, see: Leavy, 2007). However, if I truly accept that I cannot offer a definitive interpretation of the visual data, rejecting or discarding images simply because of its ambiguity would hardly be sufficient. To this end, I “[documented] the layers of interpretation that acknowledge both the content and context of the image” (Reavey & Johnson, 2017, p. 361). I engaged with the data through an iterative process of reviewing the literature, contextualizing the emerging findings within it, and ensuring my interpretation remained theoretically informed.

In another example, I collected an image featuring Kerry Porth, a former sex worker and current activist, author, and sex work policy consultant at Pivot Legal Society, dressed in a somewhat provocative police costume (see Figure 4.2 below). In this *action*-photograph, taken at the 2016 Red Umbrella March, Ms. Porth is wearing a police cosplay hat, resembling the ones worn by British officers. She is also holding handcuffs, with one cuff secured around her wrist and the other held loosely in her hand. Ms. Porth is smiling as she holds four closed red umbrellas.

**Figure 4.2**



This is not the only photograph of Ms. Porth wearing this costume, nor is it the only instance in which a cop costume or police hat appears in the sex work activist images. This was a significant finding, generating analytical insights that specifically attend to my research aims. However, out of personal curiosity, my thesis supervisor reached out to Ms. Porth via email to ask about her attire that day. Although the *why* remains unknown, Ms. Porth confirmed that she was “definitely going for the cop vibe.” Her response was not included as part of my findings, as it did not influence the direction or interpretations made in the analysis. I recognize, however, that my “reading” of the image, to use Hall’s (1997) turn of phrase, is not the only interpretation to exist or even one that Ms. Porth may draw herself. Melissa Munn (2014) aptly articulates my commitment here, which is that even though another researcher and/or the sex worker rights activists captured in the visual data might interpret the images differently, the goal is to ensure that they could understand the rationale behind my interpretation and analytic choices.

As a final example, I reflect on the notable presence of red umbrellas in the visual data. Although I discuss this finding thoroughly in the following chapter, red umbrellas are observed in nearly all sex work activist images. In private conversations with my supervisor, she shared that it was once a strategic choice to incorporate red umbrellas in public demonstrations. Indeed, it was intended to capture the attention of the press as it “made for good photographs.” While the red umbrella remained a key finding and unit of analysis, I recognize that no analytical interpretation could have generated the same insight, or most crucially, speak to such intent. This example further illustrates that my interpretation does not offer a complete picture. I was highly aware and cognizant of this throughout the research process, reviewing the literature and consulting with my thesis supervisor to ensure the relevancy of my analysis. As such, the aim for this research is to generate interpretations that are informed by the literature and grounded in the theoretical framework guiding this study.

## Chapter V: Findings & Analysis (Performance)

*Once upon a time there was a child.  
They told her that she could be anything.  
But they never told her about the stigma that would sting.*

*She shouted, 'why the fuck is nothing ever reconciled?'  
Once upon a time, that child was exiled.  
Slotted into categories, prejudices and misconceptions.  
Defiled and styled to become profiled.*

*Condemned by people who do not understand  
that our labour is in demand.  
Do you know where we stand?  
We are working and playing on unceded Coast Salish land.  
We never got the chance to join hand in hand  
and that was intentionally planned.*

*We are crafted into victims without agency.  
You have created this notion of dependency.  
You have displaced us and torn us apart,  
some of us are trying to stop the descent into vagrancy.  
Do you not see the urgency?  
Show some compassion, respect and empathy  
Because we deserve our safety.*

*Clients hand her envelopes and she does the assisting,  
the twisting, only to receive blacklisting.  
But nevertheless she is persisting, because by simply existing, she is resisting.*

*Sex worker.  
Title of occupation.  
Whore.  
Reclamation.  
We hold on to each other because we live in a world  
that has condemned us to damnation.  
Displacement and gentrification.  
How does she express this frustration on such severe discrimination?  
When she is working under abolitionist law,  
encouraging sex work cessation.  
Our government's predation impacts our vocation.*

*Where the fuck is our salvation?  
When do we get our liberation? Our decriminalization?  
We are in formation, when will the laws undergo transformation?  
Our clients love our temptation, our flirtation and our consideration,*

*so stop persecuting them for exploration.  
Her work comforts and nurtures.*

*Our sisters are disappearing, put an end to these violent tortures.  
“Keep your laws off our bodies, our clients, our money,” because we are workers.  
Where is your allyship?  
Get off your high horse and out of this saviour narrative trip.  
Some of us strip, crack the whip, and can mend a broken relationship.*

*Once upon a time there was a child.  
They told her she could be anything.  
But they never told her about the stigma that would sting.  
Once upon a time, that child was me.*

– Raven

*Once Upon A Time* is found in *Sex Worker Wisdom*, a collection of poetry that PACE Society compiled and published in 2017. I begin this chapter with this poem, as it engages with and reflects central themes that emerged from the visual data: (1) The Past and Present Fight for Sex Workers’ Rights; (2) Red-Light Revelations: Colour as a Marker of Resistance; (3) Dress to Resist; and (4) Performing the Subject-Self, Reframing the Narrative. To properly discuss all four themes, this chapter is divided into two sections. The first expands on the concept of resistance and discusses *the nature of protest* using key theoretical insights introduced in the theory chapter. More specifically, I build upon the works of Foucault and Butler to conceptualize protest as both a discursive event and performance of resistance. Central to this discussion is how sex workers and sex work activists enact solidarity and resistance through symbolic communication. The second section more explicitly engages with the *performance of the subject-self*. Here, I focus on the diverse ways in which sex workers and sex work activists challenge normative tropes and problematic assumptions via their appearance and attire at protest events.

### **The Nature of Protest**

As discussed in the theory chapter, the term resistance has been used to describe a wide range of actions and behaviours. For the purposes of this thesis, resistance is defined as an individual or collective process (Cresswell, 1996; Hollander & Einwohner, 2004; Rubin, 1996; Scott, 1985), involving acts (verbal, non-verbal, and symbolic) or “patterns of actions” (Johansson & Vinthagen, 2016, p. 418) to confront structures of power (Rubin, 1996), negotiate subjectivities (Gregg, 1993) and reject subordination, as well as challenge “the ideologies that support [such] subordination” (Weitz, 2001, p. 670). In *Volume I of The History of Sexuality*, however, Foucault (1978) reminds us that resistance is not an external or oppositional force to power. Rather than thinking of power and resistance as in direct and observable conflict, they are better understood as having a dialectical relationship; both of which operate in subtle, diffused, and dispersed ways (Foucault, 1978). As such, like power, resistance does not come in a single, overarching form (McHoul & Grace, 1993). It is “distributed in an irregular fashion,” manifesting in localized or subtle individual actions that challenge specific exercises of power (Foucault, 1978, p. 96).

Foucault (1978) emphasizes the transitory nature of resistance, using terms such as “points” or “knots” to describe specific actions, events, or locations where resistance is particularly pronounced or visible. Protests, for example, act as focal points where the dispersed, often subtle or localized, acts converge into a more unified expression of dissent (Eyerman, 2006). For James Scott (1990), best known for his work on “everyday resistance,” protests represent moments in time in which the “hidden transcript” is expressed or revealed in a public setting. In other words, protests are strategic displays of dissent, and based on this reasoning, I conceptualize it as a discursive event in which marginalized groups (such as sex workers) engage in the “embodiment and communication of those ideas through protest” (Strong & McLaren, 2013, p. 54).

Indeed, protests are one of the most recognized ways in which disenfranchised groups challenge and engage with relations of power. A protest, by definition, refers to a collectively organized event or gathering to communicate solidarity, resistance, or opposition (Butler, 2015). Protests are characterized by the structured movement of individuals, typically through coordinated and ritualized activities such as marching in the streets and gathering in urban spaces, including orchestrating sit-ins or die-ins, while carrying protest signs (Alexander, 2006; Baaz, Lilja, & Vinthagen, 2017; Cadena-Roa & Puga, 2021; Eyerman, 2006). While some protests appear to be spontaneous, many are carefully planned and involve logistical coordination such as planned routes, and in some cases, requires authorization from the city to temporarily occupy public space. While it is not always mandatory to notify city officials or obtain a permit to publicly gather, protests implicitly involve what Butler (2015) describes as “a taking up or taking over of a street that seems to belong to another public” (p. 153).

Within this view, when people collectively organize and “lay claim to a certain space as public space,” they actively transform and reconfigure the material environment (Butler, 2015, p. 70). This can be understood in two ways: First, urban spaces, once perceived as neutral or apolitical, become imbued with political significance and transformed into a site of resistance (Baaz, Lilja, & Vinthagen, 2017; Butler, 2015). To be clear, this process occurs through the act of organizing itself (Butler, 2015). For example, sex workers and sex work activists “organize the architecture,” to use Butler’s (2015) turn of phrase, by gathering and marching in the streets while carrying protest signs, banners, and even flags (p. 71). The material environment is then transformed, as they physically alter the function and flow of the street. This is nicely exemplified on Figure 5.1 (see below), an *action*-image where sex worker rights activists are seen marching on one side of the road, with the other side reserved for one-way vehicular traffic. This is consistent

with Butler’s (2015) broader observation that the “public character” of the material environment is continually negotiated, “disputed, and even fought over when these crowds gather” (p. 71).

**Figure 5.1**



Secondly, these acts not only transform public space but also “animate” it (Butler, 2015, p. 71). Put simply, when sex workers and sex work activists publicly gather, they reveal the effects of power. Foucault (1978) speaks of this as rendering power visible. One of the most recognized ways in which disenfranchised groups do this, and thereby animate the space, is through repeated chants as they march and gather in the streets. For example, at the 2<sup>nd</sup> annual Red Umbrella March in Vancouver, sex workers and sex work activists chanted, *Only Rights Can Stop The Wrongs* (Triple-X, 2014). This chant, also commonly written on protest signs, is a public declaration that ‘rights’ should be the foundation of justice, rather than a legal construct that can be (and has been) effectively denied to sex working communities. The ‘wrongs’ thus refer to the devastating impacts of criminalization and stigmatization. Although I offer a closer examination into written statements

in the following chapter (Chapter VI), this chant is an example of how sex workers and sex work activists render power visible as they take to the streets.

This animation of public space is also evident when sex workers and sex work activists speak into megaphones to vocalize their demands (see Figure 5.1 above). In fact, some of the collected images capture sex workers and sex work activists standing on concrete steps, with a megaphone in one hand and a piece of paper in the other. All these communication devices serve as a medium through which sex workers demand their right to be heard. Of course, as Butler (2015) reminds us, disenfranchised groups also communicate in non-verbal forms. We see this, for example, when sex work activists raise protest signs above their head and angle them toward onlookers while marching in the streets; a subtle, non-verbal strategy for making their demands and grievances known.

### **Theme #1: Past and Present Fight for Sex Workers' Rights**

Resistance not only renders power visible through speech and the structured movement of assembling bodies, but also through symbolic objects that carry historical, political, and cultural significance. The red umbrella, for example, a global symbol of sex workers' rights, was found in nearly all sex work activist images. The red umbrella as a symbol of sex worker resistance was first introduced in 2001 at the 49<sup>th</sup> Art Biennale in Venice, Italy (NSWP, 2021). During this event, Italian sex workers paraded the streets of Venice with red umbrellas to call attention to their poor and unsafe working conditions (NSWP, 2021). At the time, sex workers reported that it also symbolized protection from violence, harassment, and abuse experienced by those working in the sex trade (NSWP, 2021). Four years later, in October 2005, the International Committee on the Rights of Sex Workers in Europe (ICRSE)<sup>47</sup> formally recognized the red umbrella as a symbol of

---

<sup>47</sup> The ICRSE is a coalition representing over 100 sex worker organizations in 30 countries across Europe and Central Asia (ESWA, n.d.). Founded in 2002, they advocate against the criminalization of sex work, and like Canadian

sex worker resistance, honouring all sex workers who have bravely fought (and continue to fight) against discrimination and oppression (SWAN, n.d.). It has since become a staple in the sex workers' rights movement, representing collective identity and sex worker solidarity (NSWP, 2021). Thus, it is the symbolic resonance of the red umbrella that helps imbue the material environment with political significance.

Sex workers and sex work activists also animate the space with various instruments and noisemakers, such as plastic stadium horns, whistles, cowbells, tambourines, and Indigenous hand-drums. “Bringing the noise” is a common, deliberate tactic used in many public demonstrations, as it draws attention and increases their visibility due to the temporary disruption to the “everyday soundscapes” (Kong, 2021, p. 22). In other words, the sounds produced by these instruments are not typical of those we encounter on the streets, public parks, or neighbourhoods (Kunreuther, 2018). Although protests inevitably contain elements of noise such as repeated chants, some demonstrations intentionally create loud, excessive, or rhythmic sound. In short, noisy demonstrations can be thought of as a deliberate and subversive strategy to performatively enact resistance.

### ***Subtheme #1: Sounds of the Past and Present Fight for Sex Workers' Rights***

While noisemakers are commonly employed in public demonstrations, the ubiquity of this in sex worker rights protests is particularly notable due to the historical framing of *prostitution as a public nuisance*. In particular, as we saw in Chapter I and II, moral panics surrounding the “visibility of prostitution” circulated throughout the 19<sup>th</sup> century and were later reproduced in the 1980s as a result of urban reconstruction and gentrification, shifting public attitudes, and corresponding legislative changes. The discursive framing of sex workers as a public nuisance

---

coalition groups, conduct critical research to advance their mandated purpose (Red Umbrella Fund, 2022). In 2021, the ICRSE changed its name to the European Sex Workers Rights' Alliance (ESWA).

catalyzed aggressive anti-prostitution campaigns spearheaded by middle-class residents and justified the displacement of street-based sex workers (Ross & Sullivan, 2012). The intense social and legal crusade against sex workers during this time has left a lasting imprint on the movement and continues to be felt deeply by the community. This is especially poignantly expressed in the poem introduced at the start of this chapter when Raven (2017) writes: “You have displaced us and torn us apart [...] Do you not see the urgency? Show some compassion, respect and empathy, because we deserve our safety.” This history has unquestionably shaped the contemporary movement for sex workers’ rights, influencing how sex workers navigate the current criminalized context, advocate for their rights, and challenge dominant narratives. I also found that it informs their strategies of resistance, as sex workers and sex work activists demonstrably evoke this history.<sup>48</sup>

To elaborate on the significance of this finding, it is necessary to recall one of the earliest sex workers’ rights protests organized by ASP in 1984. As discussed in the literature review, this protest emerged as a counter-demonstration to oppose CROWE’s anti-prostitution harassment campaign, which targeted men who bought sexual services (Ross & Sullivan, 2012). Following an injunction that named thirty sex workers and allies as “public nuisances,” ASP took to the streets with “whistles and noisemakers, proclaiming themselves to be the ‘thirty-first public nuisance’” (Triple-X, 2019, p. 4). Thirty-five years later, as a symbolic gesture at the 7<sup>th</sup> annual Red Umbrella March, sex workers and sex work activists “re-enacted” the 1984 protest and took to the streets with various types of noisemakers (Sorfleet, 2019). This provides a compelling example of how

---

<sup>48</sup> Of course, sex workers and sex work activists come together to remember and mourn lives lost to violence every year on December 17<sup>th</sup>, the International Day to End Violence Against Sex Workers (IDEVASW). On this day, sex workers organize against discrimination and oppression, highlighting various systemic conditions that endanger their lives. Moreover, in 2020, SWAP Hamilton organized a vigil to mourn all victims of Robert Pickton, representing one of many ways sex workers and sex work activists demand justice and a greater societal acknowledgment of the harm and abuses faced by the community.

sex workers and sex work activists deliberately bring attention to the history of sex worker oppression. It is also one of many performative acts honouring those who dared to fight back, especially at a time when publicly identifying as a sex worker increased an individual's vulnerability to police harassment and violence.

Given the notable presence of noisemakers across the sex work activist images, I extend this analysis to examine how sex workers and sex work activists may strategically utilize noisemakers to symbolically communicate their refusal to be silenced. This conveys a similar tone as the popular LGBTQIA+ chant, *We're Loud, We're Queer, We're Here!* However, it is particularly worth noting how excessive and disruptive noise is understood as a public nuisance in some legal contexts. In fact, noise is regulated through city by-laws to control the potential disturbance "unusual" noise may cause to neighbourhood residents. By making excessive, persistent, or disruptive noise in protests, sex worker rights activists simultaneously engage and play with both meanings of nuisance. As such, taking to the streets with instruments and noisemakers can be understood as a means to subvert a label that has historically been used to justify their marginalization and displacement. At the same time, they leverage municipal concerns over unusual or disruptive sound to command attention. Nuisance, once used as a justification for their displacement and exclusion, is thus transfigured into a tool to performatively enact resistance.

Now, with this in mind, I return to our earlier discussion on the ways in which sex worker rights activists animate public space. Building upon Butler (2015), particularly insights advanced in *Notes Toward a Performative Theory of Assembly*, I argue that sex workers and sex work activists animate public space by actively calling upon their history of oppression and displacement. Sex workers and sex work activists uniquely imbue the material environment with political significance, as the right to exist (and crucially the right to be *seen* and *heard*) in urban

spaces is a key point of struggle. In this respect, when sex workers gather and take to the streets demanding equality and labour rights, it is powerfully symbolic as they reclaim visibility in spaces where they were once aggressively removed.

Furthermore, sex worker rights activists simultaneously reveal how past practices influence present power structures.<sup>49</sup> As such, these acts cannot strictly be seen as only a historical commemoration. While Canada's current legal regime no longer explicitly frames sex workers as a public nuisance, discourse and power structures that have informed earlier laws persist in shaping present conditions (Foucault, 1972). Using this logic, sex workers and sex work activists reveal shifts in how power is exercised, illustrating how current discursive practices remain embedded in social attitudes and legal discourses (Foucault, 1972). Therefore, by organizing and increasing their visibility (whether that be through rhythmic chants, delivering speeches, or using various noisemakers), sex workers and sex work activists uniquely animate public space and thus render the effects of power visible. This renewed formulation of animating public space thus invites crucial insights into how the material environment is just not a platform to express political demands, but also a part of a continued (and broader) fight for the platform itself.

### ***Subtheme #2: Embodying the Past and Present Fight for Sex Workers' Rights***

To expand on the significance of this history, I turn to a *posed*-image of two activists (potentially current or former sex workers) standing on each side of the West End Sex Workers

---

<sup>49</sup> It is worth reflecting on Figure 4.1., a *posed*-image of three sex work activists at the Red Umbrella March in 2018 (see Chapter IV). According to a flyer promoting the event, organizers sought to honour prostitutes in 1888 who received fines and were "marched to court" by the City Council (Triple-X, 2018). Of the three activists pictured, one has a five-dollar bill visibly tucked in her red fitted tank top, potentially symbolizing the act of having been fined. As such, the historical context of the 2018 march invites us to consider how current and former sex workers may call upon their history of oppression beyond the 1970s and 80s. Perhaps, it can be understood as revealing the lineage of oppression. If we accept this interpretation or can at least briefly entertain it, we see that while the punishment of those who sell sex may *look* different, the logic of discipline remains the same (even as it also appears to be justified under new political and policy regimes (i.e., PCEPA)). This thinking stems from Foucault (1972, 1978) as he argues that power operates through continuity and transformation rather than abrupt breaks, shaping the conditions under which sex workers currently resist and assert their rights.

Memorial in downtown Vancouver. Unveiled in the fall of 2016, this monument commemorates sex workers who were fined and forcibly removed from their homes and places of work between 1960 and the 1980s (Schaefer, 2016). It recognizes that the displacement of street-based workers left them vulnerable to violence and under heightened threat of serial killer, Robert Pickton (Schaefer, 2016; Takeuchi, 2016).<sup>50</sup> This also represents a time in which increased police presence undermined street-based workers' ability to work in their usual pairs due to fears of police detection and harassment (McKenna, 2022; Scott, 2019). It is within this historical context that the image below (Figure 5.2) signifies a performative enactment of the “demand to be able to gather, to assemble, and to do so freely without fear of police violence or political censorship” (Butler, 2015, p. 18). However, this performative act not only commemorates their past struggles and communicates solidarity, but also demands recognition to the ongoing fight for sex workers' rights. It is through these insights that I conceptualize protests as a *performance of resistance* that continuously ties the history to the present.

**Figure 5.2**



<sup>50</sup> The monument was funded by the City of Vancouver, and according to *Vancouver Sun*, the cost of its installment was approximately \$28,000. Reportedly, this is equivalent to the amount of fines the city collected from sex workers in 1982 (Schaefer, 2016).

In short, when sex workers and sex work activists gather around this “Victorian-style lamp post with a red lightbulb” (Takeuchi, 2016, para. 3), they animate the monument, and in doing so, echo the struggles of their fore Sisters (and brothers). This analysis further amplifies Raven’s (2017) words: “We hold on to each other because we live in a world that has condemned us to damnation. Displacement and gentrification. How does she express this frustration on such severe discrimination?” As such, in performative acts such as the one above, current and former sex workers animate the material environment and reflect the (past and present) injustices they resist. This reveals the way in which sex workers have historically been constrained, and once again, how these very constraints shape their ongoing struggle (Foucault, 1972). At the same time, it pushes us to think about how sex workers “[pose] their challenge in corporeal terms” (Butler, 2015, p. 83).

To this end, I now wish to direct our attention to how the body itself becomes a medium of communication through its visibility, structured movements, and gestures. For instance, protests often contain and produce certain performance gestures (Dutt, 2021). A review of the relevant literature suggests that these gestures can vary in intensity, spanning from transgressive actions like the “corporate zombie walks” during the occupation of Wall Street in 2011<sup>51</sup> or the U.S. national anthem kneeling protests in 2016,<sup>52</sup> to more subtle and conventional hand gestures such as ‘the raised fist.’ In fact, the ‘raised fist’ is a popular and rather iconic symbol representing solidarity, resistance, and the fight against oppression (Green, 2021; Faulkner, 2023). While it is difficult to pinpoint its exact origin, the ‘raised fist’ is reported to have appeared as early as the

---

<sup>51</sup> In October 2011, during *Occupy Wall Street*, New York protestors dressed as “corporate zombies” and marched in (fake) blood-soaked suits while holding money tightly in their hands, dangling from their mouths, and/or tucked into the collar of their shirts (CBC News, 2011).

<sup>52</sup> Colin Kaepernick, the starting quarterback for the San Francisco 49ers at the time, initiated the protest when he “took a knee” during the U.S. national anthem. This act resonated with other NFL players, who eventually joined in as a collective statement against systemic racism and oppression of Black people in the United States (BBC, 2016). It has since become a popular gesture and symbol of protest within sports (BBC, 2016).

French Revolution of 1848, the international labour movement in the late 19<sup>th</sup> century, and the civil rights movement in the 1950s (Green, 2021; Faulkner, 2023; Stout, 2020). Since then, it has become a staple in many protests and was adopted by gay liberationists during the Stonewall Riots in 1969 (Green, 2021). Although this gesture is used across social movements, the ‘raised fist’ remains strongly associated with worker resistance and Black power, recently embraced by the Black Lives Matter (BLM) movement (Green, 2021; Faulkner, 2023; Stout, 2020).

It is this history of the ‘raised fist’ that makes this finding in the sex work activist images particularly notable. Photos routinely capture sex worker rights activists with raised hands and clenched fists as they chant and march in the streets. Once again, this gesture can be interpreted as uniting them and drawing on the long history of fighting for labour rights and social equality.<sup>53</sup> However, while this gesture remains connected to its history, it is not strictly bound to it, nor is it confined to the present moment in which it is used (Butler, 2015). As such, this gesture is far more complex and dynamic than merely being a symbol of resistance. In the context of the sex workers’ rights movement, it is more accurately understood as a declaration of resistance that creates and (re)produces meaning through its enactment.

Of course, the ‘raised fist’ is not the only way in which sex workers and sex work activists spread messages of solidarity and resistance in “corporeal terms” (Butler, 2015, p. 83). For instance, they also actively engage with and challenge criminal justice policy by *performing* the harms of criminalization. This is well illustrated in the image below (Figure 5.3), which captures sex workers and sex work activists laying down in the middle of the street. This coordinated gesture, as reported by *Toronto Sun*, blocked traffic in all four directions for approximately fifteen

---

<sup>53</sup> The raised fist and its association with the labour rights movement in the 19<sup>th</sup> century is particularly noteworthy considering that the contemporary sex workers’ rights movement is largely one of labour rights advocacy. In fact, the sex work activist images capture a protest sign stating, *No Labour Movement Without Sex Workers*.

minutes (Davidson, 2014). Sex workers staged this performance to communicate concerns with *Bill C-36*, declaring that the proposed law (now known as PCEPA) will “fuel abuse” and “cost sex workers lives” (Campbell, 2014).

**Figure 5.3**



This performance act is popularly known as a “die-in,” a form of protest many organized groups, including gay activists at the height of the HIV/AIDS crisis,<sup>54</sup> have staged to symbolize the consequences of harmful policies, systemic violence, and political inaction.<sup>55</sup> Indeed, sex worker rights activists emphasize the ongoing threat of violence and harm caused *by* and as a result

<sup>54</sup> On October 11, 1988, members and allies of the AIDS Coalition to Unleash Power (ACT UP), staged a die-in outside of FDA Headquarters in Rockville, Maryland (Montalvo, 2021). Protesting the FDA’s slow approval and release of drugs to treat HIV-related conditions, protestors made tombstone-cutouts announcing their “cause of death” (Montalvo, 2021).

<sup>55</sup> It is notable that many protest groups perform death to express discontent with structures of power, and how these acts of resistance are unwittingly repeated or adopted across social movements. It is especially noteworthy that many of these groups have shared histories of oppression. As we know, for instance, sex workers were scapegoated alongside gay men for the spread of HIV/AIDS in the late 1980s (Beer & Tremblay, 2014). This re-energized myths and stigmatic assumptions from the century prior, reinstating prostitution as a central concern for public health (Beer & Tremblay, 2014). In response, sex worker groups adopted a rights-based harm reduction framework and engaged in safe-sex advocacy to dispel prevailing myths (Beer, 2010; Beer & Tremblay, 2014; Scott, 2019). Remnants of this history are found in protest signs stating, *Safe Sex Professionals. Sex Workers Use Condoms. Do You?*

of the continued criminalization and stigmatization of sex work. As Butler (1993) writes, the embodiment of death can be understood as a “theatricalization of political rage” (p. 178). As such, the act of lying down on the pavement is more than a physical, bodily gesture. It is a strategic disruption that makes visible the stakes of precarity (Butler, 2015). Butler (2004, 2015) uses the concept of precarity to describe how power (re)produces structural conditions that leave marginalized groups vulnerable to violence, exclusion, and poverty. In line with this, feigning death is a rather provocative statement communicating their struggle and showcasing their (manufactured) vulnerability. It is important to note, however, that they do not “[deploy] a hyperbolic display of death” to simply “recite those injuries,” but to demand justice and security (Butler, 1993, p. 178). This embodied message is further articulated in protest signs stating, *Decriminalize Sex Work. Save Lives* (see Figure 5.3 above). These performative elements are then “formed into [an] image and discourse for the media,” and it is this visibility that creates a sustained challenge to state power (Butler, 2015, p. 98).

Figure 5.3 also serves as a prime example of how the material environment is both “mobilized and mobilizing” (Butler, 2015, p. 83). As such, the pavement is no longer a neutral platform as it becomes an important and supportive part of the action (Butler, 2015). What is notable here is how sex workers are performatively laying claim over the material environment, establishing their right to live with dignity, safety, and security. As Butler (2015) writes, “the body on the streets persists, but also seeks to find the conditions of its own preservation” (p. 95). Put differently, when sex workers collectively organize and orchestrate political performances such as die-ins, they not only persist in their struggle but also demand the conditions that will make their survival possible (Butler, 2015).

### **Performing the Subject-Self**

Up until this point, I have presented specific actions that reflect a more technical understanding of protests (e.g., structured movement of bodies), as well as commonly thought-of protest activities such as chanting, marching with raised fists, organizing public demonstrations (e.g., die-ins), and carrying protest signs. This discussion introduced a central theme emerging from the visual data: How sex workers and sex work activists consistently recall their history of oppression and the championing of their civil and labour rights. This finding offers compelling insights into how sex workers and sex work activists mobilize, transform, and animate the material environment. Importantly, the preceding discussion on the embodied nature of resistance allows us to continue addressing the identified gap this thesis aims to fill. For instance, if we accept performance gestures such as the raised fist and staged die-in as a form of corporeal resistance, it seems logical to perceive the body as a primary source through which sex workers articulate messages of resistance. Once again, this analytical focus is not unfamiliar to resistance scholarship (see Fahs, 2022; Weitz, 2001 in Chapter III). As such, I now turn to the second section of this chapter to explore the ways in which sex workers and sex work activists resist stereotypical constructions of their lives and work through various subversive, embodied performances of the subject-self.

### ***Theoretical Underpinnings***

To move forward, I draw upon the theoretical lens employed to explore some of the ways sex workers and sex work activists resist in “corporeal terms” (Butler, 2015, p. 83). In particular, Butler (1990, 1993) and Foucault (1978) both argue that subjects are discursively produced. Once again, this refers to particular “truths” that are sustained and (re)produced from dominant knowledges (Bruckert & Hannem, 2013). Butler explores this most explicitly in *Gender Trouble*

(1990) and in *Bodies That Matter* (1993), arguing that normative rules and conditions have performative effects. This refers to how social norms actively produce identities, shaping what we come to know as appropriate and inappropriate behaviour or conduct (Butler, 1990, 1993). Sex workers, for example, deviate from cultural norms and social conventions. It can be said, then, that sex workers “resist, simply by existing” (Raven, 2017). Characterized as “both at-risk and risky” (Bruckert & Hannem, 2013, p. 48), sex workers often perform their ascribed identity. Importantly, drawing upon Foucault (1978), normative rules have discursive effects, meaning that these “truths” reinforce (stereotypical) social understandings of what it means to occupy this particular identity. These tropes are then used to justify legal responses to prostitution. PCEPA, for example, constructs sex workers as victims and those who purchase sexual services as predators. It is important to remember, however, that dominant understandings do not describe or reflect reality but rather create (a stigmatized) social existence (Bruckert & Hannem, 2013; Secomb, 2008). Butler (1993) maintains that norms and social conventions require ongoing repetition through discourse, legal systems, and everyday interactions to sustain their authority and legitimacy. However, as Butler (1993) and Foucault (1978) remind us, because reality is not fixed, these discursive constructions also create the conditions of possibility for resistance.

Informed by these insights, I developed the concept of *performing the subject-self*. It is through this concept that I explore how sex workers resist stereotypical assumptions by embodying the tensions between their personal and ascribed identity. This section is divided into three parts. First, I introduce the second theme to emerge from the visual data: Red-Light Revelations: Colour as a Marker of Resistance. However, since the performance of the subject-self is not limited to the colour red, the second part of this section explores how sex workers and sex work activists Dress to Resist (Theme #3) more broadly. The final section examines how sex workers produce an

alternative discourse in their performance of the subject-self (Theme #4). This systematic review enables a comprehensive and in-depth understanding of how sex worker rights activists enact resistance and communicate dissent in corporeal terms.

### **Theme #2: Red-Light Revelations: Colour as a Marker of Resistance**

Sex workers not only enact resistance through structured movements and performance gestures, but also through key visual elements. For instance, the colour red is a dominant visual throughout the sex work activist images. It appears in clothing, as sex workers and sex work activists wear red shirts, dresses, skirts, pants, sweaters, and jackets. Characterized as *the red wardrobe*, the colour is also evident in their footwear (see example on Figure 5.4 below), as well as observed in specific objects used to call attention such as noisemakers (e.g., red cowbells, stadium blowhorns, and whistles). This, of course, all occurs under the canopy of red umbrellas and large protest signs with messages written in red marker.

In addition to clothing and objects, the colour red appears in accessories, some of which carry historical and cultural significance. For instance, in nearly all of the collected images, sex workers and sex work activists are wearing red feather boas. Once a symbol of luxury and elegance in the 1920s, feather boas have also been embraced as a marker of erotic entertainment, allure, and seduction, likely due to its use in burlesque and drag queen culture (Generations of Stelliennes at Stella, *l'aime de Maimie*, 2019; Pepper Development, 2024). In fact, as Stella recalls its use at the Marche Mondiale des Femmes in 2000 (see Chapter II), feather boas add a “bit of fluff and fun to cut through the darker, ‘heavy’ public image of prostitution” (Generations of Stelliennes at Stella, *l'aime de Maimie*, 2019, p. 277). It is uniquely conceived as a form of armour, giving sex workers a “larger and more abstract identity” during protest events (Generations of Stelliennes at Stella, *l'aime de Maimie*, 2019, p. 277). Alongside feather boas, many sex workers and sex work activists

wear red hats, leis, scarves, and beaded necklaces. These accessories are sometimes paired with other items such as red masquerade masks, sunglasses, and wigs (see example on Figure 4.1) The sex work activist images also show protestors with red painted nails and wearing red lipstick.

The recurring use of the colour red indicates a deliberate choice in how sex workers and sex work activists present themselves at public demonstrations. This finding particularly stands out when considering the significance of the colour red and its historical connotations in Western culture. Red is traditionally associated with love and passion (Shazly, 2022), and specifically linked to seduction, temptation, fantasy, and sexuality (Mellor, 2024). While it goes beyond the scope of this thesis to provide a genealogical review of the colour red, Michel Pastoureau (2000) claims that its association with promiscuity dates back to the Middle Ages. During this time, prostitutes (or “Harlots” as they were also known) were required to wear red and other bright articles of clothing to distinguish themselves from “respectable women” (Pastoureau, 2000). With this history in mind, it is hardly a coincidence that urban areas known for having a high concentration of sex workers and erotic businesses such as brothels and adult entertainment venues were designated as red-light districts. As a reminder, this refers to urban spaces where prostitution has been both regulated (or rather historically tolerated) and controlled (Gray, 1971; Nilsen, 1980), or otherwise areas indicative of criminal activity (Agustín, 2007; McLaren, 1986, 1995). As such, the colour red carries significant historical and cultural relevance to the regulation of prostitution.

The colour red and its association with promiscuity has also been used in Nathaniel Hawthorne’s (1851) celebrated novel, *The Scarlet Letter: A Romance*. This book follows the story of Hester Prynne, a young woman who is publicly shamed by the Puritan community for committing adultery. Condemned for her “immoral” choices, Hester is forced to wear garments with a large letter ‘A’ (for adulterer) embroidered in red (Ellerby, 2015). This punishment

resembles disciplinary measures from the Middle Ages. Hester thus wears her “sin” and puts her non-conformity to societal conventions on display. Here, the colour red symbolizes her ascribed identity as a “fallen woman,” which of course, closely aligns with the discursive framing of prostitutes in the 19<sup>th</sup> century. Relatedly, in Haihong Gao’s (2018) analysis of the symbolism of colour in *The Scarlet Letter*, he points out that Hawthorne presents a rather “gloomy world” to the reader (p. 1728). The story is told against a backdrop of grey, a colour that reflects social conformity and control, as well as the repressive nature and moral rigidity of Puritan society (Gao, 2018).

Much like the social attitudes in *The Scarlet Letter*, the discursive framing of prostitution conjures a similar imagery of grey. This is best exemplified in the characterization of clients and third parties as “shadowy,” deviant figures (McLaren, 1995, p. 553). In fact, we see Stella adopt similar language when describing the “[dark] and ‘heavy’” imagery often associated with prostitution (Generations of Stelliennes at Stella, l’aime de Maimie, 2019, p. 277). This visual is also produced and sustained in the news media. As such, during the data collection phase, I came across several digital news sources that published a recurring gloomy image: a sex worker standing alone on the sidewalk of what appears to be a ‘dodgy’ or undesirable part of the city. She is dressed in dark clothing, typically wearing a short, fitted dress, fishnet pantyhose, and high heels. The image sketches a rather bleak story; a depiction of isolation that may serve as a metaphor of the (perceived) hardships and struggles of a street-based sex worker’s life. Therefore, such imagery reinforces moralizing discourse and sustains narratives of victimhood, many of which are embedded within PCEPA. It is also a rather dehumanizing depiction of sex workers and demonstrates how broader social and economic conditions leaving them vulnerable and at risk of violence are ignored.

In considering this grey and gloomy imagery created and sustained in news media, the colour red in sex work activism functions as a symbol of vitality, countering dominant discourse that reduces sex workers to a perpetual state of precarity. This qualifies as performing the subject-self as red operates as a unifying colour through which sex workers enact resistance to their ascribed identity. At the same time, it illustrates how they perform a collective identity to counter stigmatic assumptions. To be clear, I am not suggesting that sex worker rights activists deliberately draw upon this historical record or reflect on the symbolism of colour in *The Scarlet Letter*. The intention here is to present the colour red as both emblematic of the stigmatization of those working in the sex trade and as an active expression of collective resistance. Furthermore, if we understand it as a way in which sex workers perform a collective identity, specifically drawing upon its historical and symbolic meaning in the Middle Ages (i.e., to identify oneself as a prostitute), then its presence in the visual data can be thought of as a reclamation: ‘Yes, we are sex workers, and we deserve safety, equality, and labour rights.’

### **Unpacking Broader Visual Strategies**

The colour red undeniably serves as a powerful symbol of enacting a collective identity, offering sex workers and sex work activists an opportunity to visibly align with and support the community. While there are particular instances of its use (such as the notable presence of red umbrellas and feather boas), it is important to acknowledge that the colour red works in harmony with other visual and textual elements. For instance, it is found on basic t-shirts and tank tops with printed statements such as *I Love and Support Sex Workers, My Body, My Choice*, and *Fuck The Patriarchy, But Not For Free*. These instances highlight how activists enact a collective identity (via the red wardrobe) even in subtle ways.

To expand on this finding, I turn to an *action*-image taken at the Red Umbrella March in 2016 (see Figure 5.4 below). The female-presenting activist on the far right is wearing light-wash denim shorts, which have been cut-out to resemble the shape of thong underwear. Underneath are red fabric shorts with the word “ass-ociate” written in black marker. The sex work activist is most likely referring to the right to associate, a fundamental freedom protected by the *Canadian Charter of Rights and Freedoms* (section 2(d)). In traditional labour contexts, section 2(d) “guarantees the right of employees to meaningfully associate in the pursuit of collective workplace goals” (Department of Justice Canada, 2024, para. 15). This includes protection against government enforced restrictions that would prevent them from doing so (Department of Justice Canada, 2024). There is a troubling irony to this, as the criminalization of prostitution renders it difficult for those in the sex trade to organize and associate as workers to improve their safety and wellbeing. The activist, therefore, might be bringing these issues forward, demanding that sex workers be granted the same rights as other workers in Canada.

**Figure 5.4**



Moreover, Figure 5.4 demonstrates the application of humour, despite the seriousness of the issues they are protesting. It serves as a cheeky (pun-intended) reminder that, even though sex workers and sex work activists may exercise their right to temporarily occupy public space (freedom of assembly, s.2(c)), their ability to collectively organize and advocate for safer working conditions outside of this context is fundamentally denied.<sup>56</sup> This is largely because the law does not recognize sexual labour as a legitimate income-generating activity. Instead, PCEPA pushes a narrative of victimhood and thereby denies sex workers' capacity to determine the nature of their own relationships (Gillies & Bruckert, 2018). Given this complex legal framework, Figure 5.4 can be understood as emphasizing sex workers' decision-making capacity and as part of broader movement goals to put forth an alternative discourse; one that is rooted in labour rather than their perceived victimhood.

### **Theme #3: Dress to Resist**

Sex workers and sex work activists dress in an array of ways to counter normative tropes and resist problematic assumptions. For a more in-depth exploration of this, I now expand and apply the concept of performing the subject-self to examine how sex workers and sex work activists dress to resist beyond *the red wardrobe*. As such, the sex work activist images show that protestors frequently wear fishnet pantyhose underneath dresses, skirts, and shorts. Fishnets have long been associated with promiscuity, rebellion, and non-conformity to normative conventions. Although it is difficult to trace its exact origins, fishnets were first popularized in the early 20<sup>th</sup>

---

<sup>56</sup> In 1990, the Supreme Court of Canada ruled that section 195.1 (the previous communicating law) was not in violation of section 2(d) of the *Charter of Rights and Freedoms* (*R v. Skinner*, 1990) (see supra note 25, at 34 for more case details). The Court reasoned that communicating with potential clients was an “expressive conduct and not conduct of an associational nature” (*R v. Skinner*, 1990). While section 195.1 has since been repealed, the government of Canada appears to continue to cite this ruling to justify their reasoning that current prostitution laws do not infringe upon *Freedom of Association*.

century. They were particularly favoured among flappers<sup>57</sup> and showgirls because, under the stage-lights, the skin beneath the mesh became visible (Boone, 2016). This subtle exposure of skin added a new layer of seduction while performing (Boone, 2016). Moreover, Amy Boone (2016) puts forth that the open-knit structure of fishnets was less restrictive than other popular tights at the time, allowing showgirls “to dance more freely” (para. 3). It regained popularity in the 1950s with the proliferation of print pornography (Boone, 2016), further endowing it as a key fashion item in adult entertainment and erotic dancing, including burlesque, cabaret, and striptease performances. While fishnets have gradually entered mainstream fashion, its history and long-time association with sexual appeal has solidified the accessory as characteristic of a (stereotypical) sex worker aesthetic.

However, fishnet pantyhose is certainly not the only accessory associated with sexual labour. As such, sex workers and sex work activists *dress to resist* by styling ‘everyday’ clothing with other items that may qualify as “flamboyant hooker fashion” (Ross, 2018, p. 258). For example, while most activists protest in sneakers or flats, some wear high heels such as leather pumps and platform stilettos (see Figure 5.5 below). Colloquially known as “stripper heels,” stilettos have been a defining feature of stripping culture since the 1970s and 80s (Lodi, 2021). However, high heels remain associated with traditional standards of female beauty; standards that sex workers are consistently viewed as challenging. Despite this, high heels are recognized as a staple of the profession and embraced as a symbol of femininity during striptease performances. At the same time, it has also been conceived as a way to exaggerate femininity, where it becomes “difficult for those with a mainstream sensibility to consume” (Nault, 2018, p. 14). In particular,

---

<sup>57</sup> In the 1920s, “flappers” were known as young unmarried women who openly confronted and defied conventional norms and standards of behaviour.

the rather bold platform heels pictured on Figure 5.5 (below) push the boundary of what is deemed an acceptable expression of female sexuality.

**Figure 5.5**



At this point, it feels necessary to make a crucial distinction between stereotypical imagery found in news media and when these representations appear in the visual data. As discussed earlier, when news media reports on sex work policy issues, they often publish a recurring image of a street-based sex worker. The news media image, however, constructs a narrative that does not recognize the dignity and agency of those working in the sex trade. In contrast, when sex workers protest wearing similar items, they are engaging in a process of reclaiming their subjectivity. High heels and fishnet pantyhose are thus no longer seen through a lens of vulnerability. Crucially, in these instances, I interpret sex workers and sex work activists as performing their stigmatized (or

ascribed) identity in order to reclaim or “expand authority” over their subject positions (Haugaard, 2022, p. 354).

***Subtheme #1: Costuming Stereotypes***

These performances of the subject-self are not always subtle, and in such cases, I conceptualize it as a theatrical display of *costuming stereotypes*. This specifically refers to when sex workers and sex work activists may ‘put on’ stereotypes to highlight problematic assumptions and to draw attention to the absurdity of normative tropes. Kathleen Rowe (1990) and Mary Russo (1986) both describe this as “making a spectacle of oneself.” To illustrate this point, I turn to a *posed*-image taken at the 2015 Red Umbrella March (see Figure 5.6 below). The smiling, female-presenting subject is standing on concrete steps, holding a protest sign that states, *We Want Rights, Not Rescue*. She is wearing knee-high stockings with fishnet inserts, and although the protest sign shields the rest of her outfit, other protest images show that she is wearing a multi-coloured mini-skirt. The activist is topless, only covering her chest with a red feather boa. She is also visibly sporting red and yellow nipple covers with red tassels. This style resembles nipple tassels (also known as pasties) worn by strippers and burlesque performers in the 1950s and 60s. However, it first emerged in the early 20<sup>th</sup> century and worn by erotic dancers to comply with strict modesty laws (Stoddard, 2016). Although nipple tassels may have transcended their original purpose, its appearance in the sex work activist images conveys a similar playful cheekiness and defiant spirit. At the same time, Figure 5.6 (below) offers an example of how sex worker rights activists may “act out these dilemmas” to make normative tropes (and the absurdity of them) “visible and laughable” (Rowe, 1990, p. 411). In short, it pushes the boundary so much that it becomes a parodic display of their ascribed identity.

**Figure 5.6**



As noted in the methodology chapter, I cannot rightfully speak to this activist's intention or motivation to protest topless. What I can offer, however, is a theoretically informed interpretation of how this act confronts social norms that define 'acceptable' female conduct. Butler's (1990) critique on performativity provides a useful lens to analyze this performative act. Specifically in *Gender Trouble*, Butler (1990) argues that gender is not an inherent essence, but a performance shaped by repeated societal norms and expectations. In this context, modesty and respectability function as regulatory ideals that dictate how femininity should be performed. Therefore, applying Butler's (1990) understanding of resistance, sex workers and sex work activists confront social norms governing appropriate behaviour in their performance of non-conformity.

Figure 5.6 is not the only instance in which sex workers and sex work activists protest while topless. Other examples include activists wearing regular nipple pasties and lace bras, as

well as crop-tops notably worn by both female and male-presenting activists. Indeed, there is a distinct transgressiveness when these representations of female sexuality and immodesty are put on display. However, while sex workers and sex work activists unequivocally challenge societal and moral conventions that dictate appropriate expressions of femininity, there are underlying dynamics that invite further analysis. Performative acts, such as the one shown on Figure 5.6 (above), do not only challenge and respond to social norms and rules associated with femininity, but also to those specifically linked to a sex worker identity. Sex workers are largely stigmatized because they are engaged in labour that is deemed inappropriate for women. This stems from dominant discourse proclaiming that women cannot possibly choose to engage in an activity that is harmful and degrading (Heath, Braimoh, & Gouweloos, 2016). This discursive thread runs parallel with discourses which frame sex workers as vulnerable, hapless victims in need of saving. These discourses, as discussed in the legislative overview, form the foundational basis of PCEPA and effectively undermine a sex worker's capacity to *choose* sex work (even in the presence of factors that may constrain opportunities to seek other avenues for income generation).

The activist shown on Figure 5.6 (above) thus counters reductive and harmful normative victimhood tropes as she proudly performs a sex worker identity and showcases her partially nude body. In turn, we can think of this as *animating* the written message on her protest sign. Her smile and comfortability with being topless flips the dominant script, putting forth that her stigmatized identity (or at least the one she currently presents) deserves *rights* and not *rescue*. This reveals a broader thematic thread to emerge from the sex work activist images: The performance of the subject-self is a claims-making activity that fundamentally challenges reductive discourses, which frame sex workers as both morally threatening and vulnerable victims in need of saving. One way in which sex workers are seen challenging this is by portraying oneself as a proud sex worker (and

actively playing on moral sensibilities), while simultaneously countering victimhood tropes imposed on them. At the same time, it may represent a refusal to conform to the idea that one must adhere to societal norms of modesty to be worthy of dignity, rights, and legal protections.

#### **Theme #4: Performing the Subject-Self, Reframing the Narrative**

Moreover, it is particularly worth exploring how sex workers and sex work activists embody the tensions that exist between their personal and ascribed identities in more subtle ways. To begin, sex workers and sex work activists protest wearing ‘everyday’ clothing. This refers to casual and comfortable attire, otherwise misaligned with stereotypes associated with (street-based) sex work. While this can be interpreted as subverting normative tropes in its own right, I am interested in how sex worker rights activists perform the subject-self in wearing everyday clothing (e.g., jeans and t-shirts) with red accessories that carry historical or symbolic meaning. Figure 5.7 (below), a *posed*-image of two sex work activists, illustrates this finding.

**Figure 5.7**



While the activist on the right is the primary subject of the image, I direct attention to the sex work activist visible in the background, though slightly out of camera focus. This activist is wearing a red headband topped with devil horns. This raises attention to the demonization of sex workers through legal frameworks, social stigma, and moral discourse. PCEPA, in particular, sustains and reinforces stigmatic assumptions which portray sex workers as risky, threatening, immoral, and deviant. In considering this, I wish to advance the idea that this performative act functions as a manifestation of what is *thought* about sex workers, or more broadly, what is *thought* about the sex industry. However, upon further investigation, the seminal work of Stanley Cohen and his formulation of folk devils and moral panics cannot be ignored.

Folk devils refer to a group of people who are characterized as deviant or social outcasts (Cohen, 2002). Accordingly, moral panics emerge once a “person or group of persons... becomes defined as a threat to societal values and interests” (Cohen, 2002, p. 1). These groups of people (e.g., sex workers) are often scapegoated and blamed for a variety of social problems, becoming central targets of legal and social measures of control. According to Cohen (2002), moral panics typically emerge, dissipate, and resurge over time, often driving a renewed sense of urgency to regulate or control marginalized groups. This cyclical pattern is evident throughout the history of prostitution, where moments of heightened moral panic have sparked public outcry (as observed in the 1970s over the perceived harms of pornography or the visibility of street sex work in gentrifying neighbourhoods), legislative shifts (e.g., the passing of PCEPA in 2014), and intrusive law enforcement efforts. Using this logic, red devil horns may serve as a satirical expression of sex workers being one of the most persistent folk devils in society. Therefore, red devil horns not only call attention to the construction of sex workers as morally and sexually deviant but also

invite broader reflections on how this discursive framing is almost required in order to justify regulatory measures implemented to treat the social problems prostitution purportedly creates.

I now move on to consider the activist on the right of the image (Figure 5.7 above). She exudes poise and professionalism, as she stands confidently holding a protest sign which states, *It's A Pleasure Doing Business*. She is wearing a casual, tan-coloured fitted dress and a red plastic motorcycle hat with the words “bad girl” written on the front. In the event that she is a current or former sex worker (which is how she appears to be presenting), there is a clear contradiction and/or disconnect in her professional stance and stereotypical understandings of sex workers. This tension is especially pronounced as she wears the label of being a “bad girl” (notably evoking a similar statement as Hester Prynne from *The Scarlet Letter* as she wears her respective label of sin). However, her attire and soft smile draw into question on who is characterized as a “bad girl” and for what reason. The symbolism here is quite striking: The activist showcases her ascribed identity as a “bad girl,” yet presents herself as a professional, working woman.

Slightly shifting our analytical focus to the protest sign, it must be acknowledged that the phrase, *It's A Pleasure Doing Business*, is a well-known sentiment in traditional transaction-based labour. It is typically said to express appreciation for a mutually beneficial exchange and/or indicate a positive experience working with another person. This confronts stigma that sets sexual labour apart from other service-based industries, highlighting that sexual services are also negotiated and agreed upon under consensual conditions. Of particular significance, it provokes critical thought about how business transactions occur between two consenting parties; putting forth that this (traditional) labour dynamic is not unlike negotiation practices between sex workers and third-parties, as well as with potential clients.

Indeed, the protest sign shown on Figure 5.7 (above) directs attention to highly problematic assumptions regarding sex workers and the nature of their relationships with those who purchase sexual services. As discussed in the legislative overview, Canada’s current policy regime, PCEPA, views clients as responsible for violence, abuse, and exploitation in prostitution. In particular, the newly enacted purchasing offence (s. 286.1, *Criminal Code*, 1985) has effectively codified sex workers as victims and clients as perpetrators of harm. To a large extent, clients, alongside the imagined “pimp” and sex traffickers, have become the new deviant figure (Khan, 2018). While sex workers and sex work activists reject this logic in several ways, including through protest signs which directly state, *Sex Work Is Pleasure. Not Violence. My Clients Are People, Not Criminals!*, the image below (Figure 5.8) uniquely challenges PCEPA by visually depicting a positive sex worker-client relationship.

**Figure 5.8**



As such, this *posed*-image features two individuals standing side by side, smiling, and holding protest signs. The woman on the right of the image is wearing a short red dress, paired with black fishnet tights and combat boots. In her hand, she holds a sign that says, *I Love My Clients!* The man beside her is casually dressed, wearing a plain red t-shirt, light-wash denim jeans, and a baseball cap. He holds a sign stating, *I Support Sex Worker Rights*. Based on these visual elements, I interpret the woman as having identified herself as a sex worker (at least temporarily for the purposes of this image), standing happily next to one of her clients (again, at least visually and temporarily). She has positioned her body toward the man standing next to her, appearing to almost be leaning into him. This indicates a sense of comfort; however, her posture and stance remain open, suggesting that while she is engaged with the other person, she maintains a professional distance. As a result, this image produces an alternative discourse that not only underscores the positive relationship sex workers can have with their clients, but that their regular clientele are not perpetrators of harm or contributing to experiences of violence in the industry.

This portrayal of a positive sex worker-client relationship is a rather creative way of identifying the flaws with PCEPA, as well as challenging stereotypical images within the public. Consider, for example, the attire of the (presumed) client shown on Figure 5.8 (above).<sup>58</sup> His casual appearance challenges pervasive, metaphorical images of clients as shadowy, “mystery men,” or inherently deviant figures. It underscores the reality that clients are often just regular people; men who are present in our everyday lives as colleagues, neighbours, friends, and family members (see Love, 2018; Redwood, 2018).

---

<sup>58</sup> While the relationship between the two subjects can be reasonably inferred as representing a sex worker-client relationship, it is important to note that neither are explicitly identifying themselves as such. With the exception of one image, no male-presenting activist is captured holding a sign that states they are a client. This is particularly important to make clear due to the legal implications of identifying as a client under PCEPA. In line with this, it is also worth noting that the woman is wearing a blonde wig and black sunglasses, conveying a concealed identity.

Beyond male-presenting activists, I began to consider who else attends and participates in the promotion of sex worker rights. I questioned: How might the participation of other groups help sex workers challenge dominant discourse and troubling stereotypes? Guided by this question, I found that youth actively protest alongside adult sex work activists. Children are seen sitting in strollers or marching with protest signs and noisemakers, demonstrating solidarity and support for those working in the sex trade. These visuals are paired with protest signs stating, *Sex Work Feeds Families*. This is especially powerful when analyzed in the context of the historical framing of sex workers and their perceived impact on the (nuclear) family. For instance, in the 1970s and 80s when middle-class residents raised concerns over the visibility of prostitution, they framed children as the primary victims (Lowman, 1998; Shaver, 1994). Moreover, we continue to see this morally-loaded assumption in Canada's current communicating law, which prohibits communicating for the purposes of offering or obtaining sexual services where children are known to be present (*Criminal Code*, 1985, s. 213(1.1)). To this end, our laws have consistently been constructed and operate to protect children from the perceived harms of prostitution.

***Subtheme #1: "I Tell Him, You Just Say, 'Yeah, That's My Mother'" – Valerie Scott***

The sex work activist images demonstrate how the movement has created appropriate and non-sexualized space for children to be included in the conversation. They primarily do so by deploying the framing of labour. This introduces a lens through which to analyze the active participation of children in sex work activism. That is, their presence symbolizes that it is through sexual labour that mothers can provide for their children, and importantly, represents sex workers' capacity as parents.<sup>59</sup> As such, the sex work activist images show direct representations of

---

<sup>59</sup> For the purpose of this analysis, I interpret female-presenting activists pictured with young people or pushing strollers as mothers working in the sex trade. However, I must emphasize that these women are not explicitly identifying themselves as such. The reason for this disclaimer is to acknowledge how mothers working in the sex industry risk losing their children, especially those living in low-income and/or racialized communities. Publicly

motherhood, including several *posed*-images of female-presenting activists smiling with young children. Of course, this interpretation does not intend to minimize or decentralize important conversations on the realities of poverty and economic constraints that may influence a woman's choice to engage in sexual labour to generate income (Duff et al., 2015).

Furthermore, youth protesting alongside adult women can be understood in the broader context of community building and advocacy. From this perspective, there is a renewed sense of community when these “bodies assemble together” (Butler, 2015, p. 74). One image in particular stands out (see Figure 5.9 below), whereby a female-presenting activist is pushing a baby-stroller and carrying a medium to large sign over her shoulders.

**Figure 5.9**




---

stating one's sex worker status does not come without consequences, and there is an unfortunate and devastating reality that when sex working mothers experience criminalization, they often lose custody of their children.

This *action*-image captures the woman as she marches away from the camera, with only the message on the back of the sign visible. It reads: *Standing Together For Sex Work Solidarity*. If we consider an alternative interpretation that this activist is not a sex worker, it opens the possibility to understand how mothers in other labour sectors may be marching in support of sex workers. This is in sharp contrast with historical narratives whereby sex workers have been socially rejected by women who conform to traditional constructions of womanhood. This ties nicely with our earlier discussion that sex workers are stigmatized (and isolated or displaced from their communities) for engaging in an activity that is deemed inappropriate or unacceptable for women. In light of this, the emphasis on solidarity (as it is both corporeally enacted and communicated via protest signs such as the one shown on Figure 5.9) signifies the importance of deconstructing stereotypes of sex workers as outsiders to the community, and to instead be seen “as women with families, children, and social networks” (Rabinovitch & Strega, 2004, p. 145).

### **Concluding Remarks: Pulling the (Red) Threads Together**

The primary aim of this thesis is to explore the ways in which sex workers and sex work activists resist and challenge relations of power, as well as negotiate their subjectivities (Gregg, 1993) in corporeal terms. I have previously framed this as an endeavouring to explore acts of resistance that have escaped scholarly attention. Drawing upon the influential works of Butler and Foucault, it is my hope to offer an alternative lens through which to analyze sex worker resistance. In pursuit of this goal, central themes emerged such as how sex workers and sex work activists continuously call upon their history of oppression and the championing of their equality rights (Theme #1: The Past and Present Fight for Sex Workers’ Rights), how they communicate solidarity and enact resistance via dominant visuals like the colour red (Theme #2: Red-Light Revelations: Colour as a Marker of Resistance), and the ways in which sex workers protest wearing accessories

characteristic of a sex worker aesthetic (Theme #3: Dress to Resist). These themes illustrate how sex workers embody both their personal and ascribed identities to challenge prevailing stereotypes and (what they perceive to be) problematic assumptions about the sex industry. The above review and analysis ultimately demonstrate how sex workers and sex work activists challenge dominant discourse (Theme #4: Performing the Subject-Self, Reframing the Narrative). Discourse, as Foucault (1978) theorizes, serves as “a point of resistance” as disenfranchised groups (e.g., sex workers) can articulate an “opposing strategy” (p. 101). Although this tends to be thought in the context of written statements (to which I will now turn), I argue that the performance of the subject-self is also engaged in the production of discourse, and by extension, alternative discourse.

## Chapter VI: Finding & Analysis (Discourse)

While this thesis is primarily interested in how sex workers and sex work activists enact resistance in corporeal terms, the protest signs cannot be ignored as they play a crucial role in articulating the demands, values, and political stances of sex workers. Indeed, as Charles Tilly (2010) puts forth, protest signs are a fundamental component to the strategic display of dissent. This last analytic section, therefore, extends the theoretical framework developed in earlier chapters to examine how sex workers and sex work activists challenge criminal justice policies, subvert reductive narratives and stereotypical assumptions, and articulate an alternative discourse via protest signs. I unpack the messages conveyed by organizing it into two key themes: (1) Criminalization Harms, Not Helps; and (2) Sex Worker Rights Are Not Exceptional Rights. Throughout, I intend to demonstrate how sex workers assert themselves as political subjects and collectively enact recognition as workers with legitimate claims. This chapter concludes with a brief reflection on a central message that emerges across (both corporeal and written) discursive strategies of protest.

In the sex work activist images, protestors hold medium to large hand-made signs with statements, demands, and/or slogans.<sup>60</sup> Most signs are written in bold with black or red marker, with some featuring hand-drawn red umbrellas or decorative elements such as stapled feather boas. Notably, many protest signs appear regularly throughout the 10-year time period.<sup>61</sup> Indeed, activists publicly gather with protest signs that construct sex workers as political subjects who are worthy of dignity and respect, possess expertise over their own lives, and assert their authority as

---

<sup>60</sup> As a reminder, statements refer to a clear and declarative sentence (e.g., *Someone You Love Is A Sex Worker*); a slogan refers to a short, catchy, or otherwise memorable phrase (e.g., *A Blowjob Is Better Than No Job!*); and finally, demands refer to calls to action (e.g., *Decriminalize Sex Work Now!*).

<sup>61</sup> This is especially significant in light of Foucault (1977, 1978) and Butler's (1990) argument that the repetition of alternative discourse(s) has the potential to transform dominant narratives and social attitudes.

knowers (e.g., *Sex Workers Are Our Best Sex Educators*). Sex worker rights activists also passionately defend sexual labour as a legitimate income-generating activity (e.g., *Sex Work Is Real Work* and *Real Jobs Suck! I Choose Blowjobs*) and even confront stigmatic assumptions which tend to frame sex work as immoral and degrading (e.g., *For Sale: My Services, Not My Body*). It is especially noteworthy how sex workers challenge dominant framings of their work by reclaiming the very language that has historically been used to marginalize and morally condemn them. Slogans such as *No Bad Whores, Only Bad Laws* exemplify what Foucault (1978) refers to as “reverse discourse,” a process by which disenfranchised groups take up terms used against them to assert their own claims to legitimacy and rights. When sex workers deploy historical narratives and reclaim stigmatizing language such as “whore,” they confront the subtext; namely, the implication that those labeled as such are undeserving of human rights. Moreover, whether intentional or not, this act of reclamation redirects the question of morality, moving it away from sex workers and exposes the government’s moral failing to prioritize their rights and safety. In other words, they make clear that the real moral failure lies not in the decision to engage in sex work, but in the government’s refusal to safeguard those who do.

### **Criminalization Harms, Not Helps**

This critique is often sharpened through sex workers’ explicit opposition to the criminalization of prostitution. Activists argue that punitive laws not only fail to protect sex workers, but actively endanger them. These messages often manifest as direct expressions of opposition to current criminal justice policy, including demanding that the federal government *Repeal PCEPA* and *Listen To Sex Workers!* A persistent and collective message, which was explored in-depth in the preceding chapter, is the rejection of sex workers’ discursive framing as passive or hapless victims in need of rescue. However, what stands out more distinctly in the

protest signs is their direct challenge to the rhetoric of *rescue*. While state intervention is often justified as a moral imperative to “protect” women in the sex trade, activists make clear that these actions lead to further criminalization and violence against sex workers.<sup>62</sup> There is a great deal of emotion exuding from the signs, especially as sex worker rights activists deconstruct this patriarchal notion of protection. Many signs appear to speak directly to policymakers, as they passionately declare that *Bad Laws Put Sex Workers At Risk* and demand *Safety For Sex Workers Now!* Another example is a protest sign declaring, *Your Political Agenda Is Not More Important Than Our Lives*. This sign exemplifies sex work activists calling into question the entire framework which renders sex workers’ lives expendable in the name of morality and political expediency. In this respect, sex workers and sex work activists promote decriminalization as an urgent matter of justice and safety. In short, this appears to be a way in which the embodied and textual elements work in tandem as sex workers reject their subjugation as (sometimes unknowing) victims, as well as challenge “the ideologies that support [such] subordination” (Weitz, 2001, p. 670).

It is perhaps an unsurprising finding, given the timeframe under consideration, that protest signs primarily oppose, challenge, and confront problematic assumptions embedded within PCEPA. They do, however, also heavily criticize the federal government for failing to comply with the *Bedford* decision. To elaborate on the significance of this, it is important to acknowledge that the Supreme Court ruling marks a critical moment in sex worker history for two reasons: It affirmed that the previously enforced *Criminal Code* provisions put sex workers’ safety and well-being at risk, and secondly, it created space for the Canadian government to (finally) recognize

---

<sup>62</sup> One important message that emerges from the sex work activist images, though falls beyond the scope of this thesis to fully unpack, is the harmful (and often counter-productive) impacts of anti-trafficking enforcement measures on im/migrant sex workers. In this context, ‘rescue’ efforts take on the form of surveillance and policing of racialized communities (Lam, 2018; Millar & O’Doherty, 2020), often resulting in the criminalization and deportation of sex workers with precarious status in Canada (Roots, 2022). Protest signs address these concerns in very direct ways, stating, *Sex Work Is Not Trafficking!* and *Criminalization Increases Vulnerability To Violence & Human Trafficking For Migrant Sex Workers*.

sex workers as deserving of labour rights and legal protections. However, the passing of PCEPA in 2014 highlights that the government continues to propose and enforce laws that are informed by problematic and outdated assumptions. In the sex work activist images, protest signs make it known that the promised rights were not realized. Figure 6.1 (below) shows one example of this; an *action-image* of six sex worker rights activists standing together with a large protest sign stating, *9/9 SCC Justices Agree That Sex Worker's Rights = Human Rights.*

**Figure 6.1**



The passing of PCEPA thus highlights a critical juncture in the history of sex worker advocacy where the legal acknowledgment of harm caused by criminalization was overlooked to pursue a repressive and punitive agenda to “end the demand” for prostitution. This statement can be understood, then, as a performative claim to political legibility. It reminds us of the Supreme

Court decision, reinforcing the critical and important argument that sex workers deserve rights and legal protections.

### **Sex Worker Rights Are Not Exceptional Rights**

Activists appear to deliberately draw upon cultural and historical moments, demonstrating their relevance to sex workers' rights. One such example is shown on Figure 6.2 (below), a *posed-* image of a sex work activist standing on concrete steps, smiling and holding a sign that reads, *There's No Place For Justin Trudeau (Or The RCMP) In My Bedroom!* Taken at the 2018 Red Umbrella March, this is clearly a direct reference to former Prime Minister Pierre Trudeau's famous 1967 defence of *Bill C-150*, which proposed the decriminalization of private homosexual acts between two consenting adults. At the time, Trudeau declared: "There's no place for the state in the bedrooms of the nation," later adding that "what's done in private between adults doesn't concern the Criminal Code." As such, Figure 6.2 (below) references a historical moment when Parliament addressed issues of consent, public decency, and sexual freedom (Chambers, 2010). Therefore, when sex worker rights activists reference this moment, they highlight its relevance to sex worker rights and the history of sexual repression they share with LGBTQIA+ Canadians. Such activism can thus be understood as a strategic effort of *enacting* a vision of rights that has yet to be extended to them.

### **Figure 6.2**



Crucially, I argue that the activist is engaged in a process of *enacting* the values of autonomy, privacy, and (sexual) freedom. This observation becomes especially potent when situated alongside the ongoing demonization of clients, whose criminalization reinforces the perception of sex work as inherently dangerous. As Butler (2015) and Foucault (1978) would suggest, the codified framing of sex workers as victims, exploited by those who purchase sexual services, justifies the denial of equality rights that have been afforded to other disenfranchised groups. In this respect, activists reject the notion that harm is inherent to the client-sex worker relationship and instead assert that it is the government's criminalizing framework that creates conditions of their vulnerability to violence. In considering our previous discussion on this topic (see Chapter V, Figure 5.8), in order to advance their argument for decriminalization, it is

necessary to challenge the demonization of clients and affirm the agency of all parties involved in the (consensual) transaction of sexual services.

The above observation indicates a broader strategic effort to not only make political claims, but to discursively enact values that are already “legible” within broader public discourse (Butler, 1993, 2015). Sex worker rights activists further this effort when they draw upon the cultural memory and mobilize the cultural resonance of specific imagery, symbolism, strategies, and slogans used by other protest groups (Blom, 2024; Kubal & Becerra, 2014; Rigney, 2018). This is theorized as a relatively common practice for social movement groups to draw upon familiar or well-known slogans to amplify their own calls for change (Blom, 2024; Kubal & Becerra, 2014; Rigney, 2018). For instance, among the wide diversity of claims, sex worker rights activists frequently march with signs stating, *My Body, My Choice* and *Keep Your Laws Off My Body*. These two slogans are known to many feminist groups, having become “almost synonymous” with the pro-choice movement and the right to access safe and legal abortions (Blom, 2024, p. 1093). In the context of sex worker rights, activists reclaim feminist principles of bodily autonomy and extend it to include the right to choose sex work as an income-generating activity.<sup>63</sup>

It is also relevant to note that sex worker rights activists also deploy variations of the slogan, *Keep Your Laws Off My Body*. For example, a *posed*-image shows two sex worker rights activists standing side-by-side, smiling with their red umbrellas, with the activist on the right holding a protest sign stating, *Keep Your Filthy Laws Off My Silky Drawers* (see Figure 6.3

---

<sup>63</sup> In light of this, I cannot help but reflect on the *action*-image of Kerry Porth wearing a semi-provocative cop costume at the Red Umbrella March in 2016 (see Figure 4.2). While I maintain that the ‘true’ intention behind this choice cannot be known, it can be understood as a satirical expression and visual reminder that sex workers experience state violence and control. In this sense, it symbolizes the ongoing policing of sex working bodies under the guise of protection. Moreover, in recognizing law enforcement as symbols of authority and protection, sex workers may adopt this image to assert their expertise and capacity to ensure their own well-being. It signifies an important argument that sex workers should have sole authority over their own body, as they have the knowledge, experience, and capacity to protect themselves.

below).<sup>64</sup> These words are written on top of a hand-drawn red silhouette of (what appears to be) a female body.

**Figure 6.3**



The playful rewording of a well-known feminist slogan not only asserts sex workers' claims to bodily autonomy, but demonstrates how activists creatively adapt familiar protest language to reflect their own realities, infusing it with humour, wit, and specificity that makes their demands both recognizable and distinct. As Tanisha Blom (2024) suggests, sex workers may be strategically mobilizing such slogans to “tactically link social movements around a shared

---

<sup>64</sup> This protest sign is most likely referencing a lyric from *Look at Me, I'm Sandra Dee*, a popular song from the musical, *Grease*. *Look at Me, I'm Sandra Dee* has been read as a satirical message to cultural and normative conventions promoting sexual innocence of young women (Scheiner, 2001). The song is performed by Rizzo, a character who is understood in the musical as a promiscuous young woman, a striking contrast to Sandra Dee, the embodiment of purity, innocence, and the 1950s “girl-next-door” archetype (Scheiner, 2001). In this context, the activists are playfully and creatively engaging with similar normative and cultural tropes that stigmatize sex workers for failing to conform to narrow ideals of femininity and sexual propriety. At the same time, in demanding that the “filthy laws” get off their “silky drawers,” they redirect scrutiny from their own bodies to the laws that seek to regulate them.

ideology” (p. 1094). In other words, the slogan’s symbolic resonance and general acceptance in mainstream feminist discourse may help legitimize a sex workers’ rights perspective. Importantly, slogans that echo the words of abortion and gay rights cannot be viewed or treated as appropriation, as sex workers have long been vocalizing these very claims. Rather, the protest signs draw our attention to how these issues remain relevant for sex workers, at the same time as they mobilize the cultural memory of such sentiments to reveal that they encounter and resist the same forces of authority as other disenfranchised groups.

### **Concluding Remarks: A Labour Rights Perspective**

The above analysis has attempted to tease out some of the messages conveyed in the protest signs. Drawing on Butler (2015), when sex workers mobilize and gather in public space with protest signs such as the ones presented above, they enact a collective demand for recognition. This includes the right to work safely, to bodily autonomy, to be viewed as political subjects worthy of rights, and the (social and legal) acknowledgement as workers. Indeed, despite the wide range of statements, slogans, and demands, sex workers and sex work activists consistently bring the conversation back to labour. Most times, these messages manifest as direct expressions: *Sex Work Is Real Work* and *Sex Workers Deserve Labour Rights, Too!* Other times, signs add nuance and humour in their challenge to dominant narratives about the nature of their work (e.g., *A Blowjob Is Better Than No Job*). Another example is an *action*-image of a sex worker rights activist raising a protest sign confidently above her head that states: *These Titties Paid For Rent And It Should Not Be A Problem!* (see Figure 6.4 below).

### **Figure 6.4**



Figure 6.4 (above) represents a moment in which sex workers and sex work activists frame the commercial exchange of sexual services as an economic necessity. This framing has a normalizing effect as it situates sex work within the broader reality of labour that people engage in to support themselves. It also exposes the contradictions of a (capitalist and legal) system in which people are criminalized for doing what others are compelled to do: work in order to live. In this sense, it reminds us that sex work is situated within a far more complex socio-political landscape than moral or reductive narratives often allow. Furthermore, the protest sign shown on Figure 6.4 (above) pushes the boundaries of the moral sensibilities of the public, evoking the familiar trope of a woman ‘selling her body,’ while simultaneously rejecting that framing by insisting her economic agency. Put differently, the sex work activist is asserting her right to sell sexual services in exchange for financial stability.

Signs such as the one above also position sex workers as contributing members of society (rather than nuisances to be “removed” from their homes or places of work). This is especially

evident in protest signs emphasizing sex workers' role in the formal economy (e.g., *Massage Parlour Workers Pay Taxes!*); notwithstanding that the current legal framework invalidates sex work as a legitimate (and legal) means of income generation. Raven's (2017) poem, *Once Upon A Time*, adds to this finding when she writes that sex workers are "working under abolitionist law, encouraging sex work cessation. Our government's predation impacts our vocation."

Of course, we cannot forget that sex workers' demand for decriminalization is not solely rooted in attaining economic recognition, but necessary to work safely and with dignity. As repeatedly noted, the criminalization of prostitution pushes sex workers into dangerous working environments and increases their risk of violence, abuse, and exploitation. One protest sign captures this dual demand in striking clarity: *Violence Should Not Be An Occupational Hazard*. This statement, in just a few words, bridges the consequences of criminalization (e.g., violence) and the call for labour recognition (affirming that sex work is real work). It is relevant to note that the phrase "occupational hazard" places sex work within the familiar lexicon of workplace safety and rights. This discursively aligns sex work with other (socially and politically) recognized forms of labour. This underscores a persistent theme, which is that sex workers routinely reveal that their struggles for equality are connected to broader social and economic concerns. While they face unique challenges due to the ongoing criminalization of prostitution in Canada, the protest signs provoke critical thought regarding how sex workers are not fighting for a distinct set of rights. As we saw in both analytic discussions, in their calls for decriminalization, they demand equality rights and labour protections that other workers and disenfranchised groups have fought for. By invoking familiar principles through shared slogans and symbolic communication practices, sex workers position their claims within (rather than outside of) dominant frameworks of rights and recognition.

In short, this final analytic section sought to demonstrate that when protestors pose their challenge to criminal justice policies that endanger sex workers' lives, they enact an alternative set of values and bring forth counter narratives, ultimately stressing the need to socially recognize sex work as a legitimate income generating activity. Although this thesis critically examined the protest signs and embodied nature of resistance in separate sections, I understand them as part of a unified analysis. As such, the written messages of dissent gain force and urgency through the performative presence of those who carry them. Butler's (1993, 2015) work has particularly been useful here, offering this thesis a way to conceptualize discursive practices beyond speech and as something that is corporeally enacted through the performance of the subject-self. As Raven (2017) powerfully reminds us, sex workers demand that the state "keep [its] laws off our bodies, our clients, our money," not because their claims are exceptional but precisely because, as she concludes, "we are workers."

## **Conclusion**

This thesis applied a theoretical lens grounded in the respective works of Michel Foucault and Judith Butler to examine how sex worker rights activists articulate messages of dissent and challenge dominant discourse through symbolic communication and embodied performance. This called for an investigation of the (sometimes) subtle and often overlooked practices of resistance. Of course, like many other disenfranchised groups, the findings show that sex worker rights activists engage in acts of resistance that are typical of public demonstrations. This includes marching through the streets with various noisemakers, chanting and speaking into megaphones, as well as carrying protest signs with key statements, slogans, and demands. However, central to this project was my commitment to taking sex workers' agency, (hidden) creativity, and humour seriously. In doing so, I was able to tease out the layers of meaning embedded in their performances and protest signs. Crucially, this thesis found that sex workers resist stereotypes and challenge reductive discourses through the performance of the subject-self. They enact resistance and communicate solidarity through the deliberate use of the colour red and props emblematic of their fight for sex workers' rights (e.g., the red umbrella). From this, it became clear that sex workers reclaim authority and ascribe new meanings to their subject positions. In short, the conceptual lens, informed by Foucault and Butler, shed light on the ways playful, creative, and symbolic aspects of sex work activism are serious and significant forms of political expression.

## **Future Research**

A logical extension of this research would be to conduct interviews with the sex worker rights activists captured in the images. In fact, several activists were identified in the visual material, including for example, Monica Forrester of Maggie's Toronto Sex Workers Action Project, Anna Smith, the Director of Triple-X Workers' Solidarity Association of B.C, and of

course, Kerry Porth, a long-time sex work activist first introduced in Chapter IV. Interviews with these and other activists would afford the opportunity to ask about specific choices, especially as it relates to the red wardrobe, wearing items associated with sexual labour (e.g., fishnet pantyhose and stilettos), and costumes. Questions for Ms. Porth, for example, might focus on the message she aimed to convey when she arrived at the 2016 Red Umbrella March dressed in a police costume (shown on Figure 4.2). Reflecting on her email response to my thesis supervisor, I found myself curious about why she was going for the “cop vibe” that day and how her reasoning would have shaped and contributed to the analysis. In this way, future research could examine how the sex worker rights activists understand and interpret their own (embodied) actions at public demonstrations. Guiding questions might include: How do the sex worker rights activists view the role of non-verbal and embodied forms of resistance? How intentional or deliberate are their choices around their appearance and attire? What messages do they hope to convey?

At the same time, interviews would likely reveal other non-verbal and symbolic communication strategies that may have been overlooked or missed in the analysis of the visual data. This includes messages that, as Loizos (2000) would suggest, I may not have been “equipped” to uncover (p. 6), especially as a non-sex worker and white academic researcher (on this topic, see: Singh, Richmond, & Burnes, 2013). In short, building on the theoretical concepts utilized, future research holds the potential to generate a more in-depth and nuanced understanding of how resistance is corporeally enacted in the contemporary movement for sex workers’ rights.

Another promising avenue for future research would be an examination of audio-visual material depicting sex work activism in Canada. As noted in Chapter IV, two videos in particular come to mind. The first example is the 2016 short-film documentary, *Our Bodies, Our Business*, which features footage of sex worker rights protests during the 5<sup>th</sup> annual International AIDS

Conference in Montréal, Québec, in 1989. The introduction of this thesis highlighted one such moment of resistance; however, the film captures other instances of unannounced protest that would be valuable for future visual analysis. Here, Butler's (2015) theoretical insights on how subjects transform and reconfigure the material environment through collective action would be particularly relevant. Additionally, the footage compiled in this documentary would open an opportunity for future research to investigate the social tensions and power dynamics that become visible when sex worker rights activists disrupt the (expected) flow and order of the space.

A second example for future research is video footage of Terri-Jean Bedford testifying against the proposal of the *Protection of Communities and Exploited Persons Act* (PCEPA) in 2014. Invited to share her views on the proposed legislation at the Senate committee meeting (O'Malley, 2014), Bedford arrived with her signature riding crop and wore a long, black leather coat and gloves.<sup>65</sup> During the hearing, she asserted her right to speak beyond the allotted time, stating, "I have 30 years of your abusive laws, so I should be allowed at least an extra five minutes to talk about it." After repeated warnings, the session was adjourned and Bedford was escorted out. Unsurprisingly, her removal drew widespread media attention, with digital news sources circulating short video clips of the heated exchange. If taken up in future research, I would encourage attention toward Bedford's (sometimes subtle) transgressive actions. The deliberate use of her riding crop, an object that is associated with her former work as a dominatrix, is especially significant. For example, video footage shows Bedford occasionally and repeatedly tapping it against the palm of her hand. At one point, she even cracks it sharply on the desk in front of her as she expressed frustration with the proposed law and its anticipated impact on the lives of sex workers. Drawing upon Butler's (1990) lens of performativity, Bedford's attire, assertive tone, and

---

<sup>65</sup> This appears to be the same outfit she wore during the constitutional challenge against Canada's former prostitution laws.

overall demeanor during the committee hearing can be seen as *performing* her professional identity as a (former) dominatrix. The relevance and significance of this is further underscored when she uttered: “Let me get my notes in order because I told myself that I would try to act more like a lady while I was here and not a dominatrix.” With this in mind, I am particularly intrigued by how this thesis’s concept of performing of the subject-self can be expanded and enhanced, especially when applied to moments in which resistance manifests as direct conflict or confrontations with authority.

### **A Final Reflection**

It is my hope that the concepts employed in this thesis will inspire future studies to examine actions that have escaped scholarly attention and contribute to a renewed understanding of resistance. However, I want to be clear that the potential contributions of this research were never its driving force. This project was not undertaken simply to fill a gap in the literature or to satisfy academic curiosity. It was born out of my deep respect for sex workers who have bravely fought (and continue to fight) for their labour and equality rights. As the saying goes, “a picture is worth a thousand words,” and I repeatedly paused to acknowledge the emotion, depth, and complexity of issues conveyed in the sex work activist images. In recognizing the agency and creativity of sex workers, I learned that resistance is not just about communicating struggle. It is an expression of hope, connection, and self-determination. That said, this thesis is ultimately a reflection of my deep respect for the movement.

## References

- Abrams, L. (2000). Guardians of virtue: The social reformers and the 'girl problem,' 1890-1920. *Social Service Review*, 74(3), 436-452.
- Alam, M., Dwyer, P., & Roots, K. (2023). Introduction. In M. Alam, P. Dwyer, & K. Roots (Eds.), *Violence, imagination, and resistance: Socio-legal interrogations of power* (pp. 1-31). AU Press: Athabasca University.
- Alexander, J. C. (2006). Cultural pragmatics: Social performance between ritual and strategy. In J.C. Alexander, G. Bernhard, & J. L. Mast (Eds.), *Social movements: Symbolic action, cultural pragmatics, and ritual* (pp. 29-90). Cambridge University Press.
- Aroney, E. (2020). The 1975 French sex workers' revolt: A narrative of influence. *Sexualities*, 23(1/2), 64-80.
- Arthur, J., Davis, S., & Shannon, E. (2013). Overcoming challenges: Vancouver's sex worker movement. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: experience, advocacy, and research on sex work in Canada* (pp. 130-146). UBC Press.
- Agustín, L. M. (2007). *Sex at margins: Migration, labour markets, and the rescue industry*. Zed Books.
- Awad, S. H., Wagoner, B., & Glaveanu, V. (2017). The street art of resistance. In N. Chaudhary, P. Hviid, G. Marsico, & J. W. Villadsen (Eds.), *Resistance in everyday life: Constructing cultural experiences* (pp. 161-180). Springer.
- Backhouse, C. (1985). Nineteenth-century Canadian prostitution law reflection of a discriminatory society. *Social History*, 18(36), 387-423.
- Baaz, M., Lilja, M., & Vinthagen, S. (2017). *Researching resistance and social change: A critical approach to theory and practice*. Rowman & Littlefield.

- Ball, M. S., & Smith, G. H. (1992). *Analyzing visual data*. SAGE Publications, Inc.
- Banks, M. (2007). *Using visual data in qualitative research*. (U. Flick, Ed.). SAGE Publications.
- Bateman, V. (2021). How decriminalisation reduces harm within and beyond sex work: Sex work abolitionism as the “cult of female modesty” in feminist form. *Sexuality Research and Social Policy*, 18, 819-836.
- BBC News. (2016, September 2). *NFL player Colin Kaepernick snubs national anthem again*.  
<https://www.bbc.com/news/world-us-canada-37256022>
- Beaver Hall Gallery. (n.d.). Sex worker, truth & archetype: Scotiabank nuit blanche.  
<https://beaverhallgallery.ca/post/179708403622/sex-worker/amp>
- Beer, S. (2010). *The sex worker rights movement in Canada: Challenging the ‘prostitution laws.’* [Doctoral dissertation, University of Windsor].
- Beer, S. (2018). Action, advocacy, and allies: Building a movement for sex worker rights. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 329-339). UBC Press.
- Beer, S., & Tremblay, F. (2014). Sex workers’ rights organizations and government funding in Canada. In C. R. Showden & S. Majic (Eds.), *Negotiating sex work* (pp. 287-309). University of Minnesota Press.
- Belak, B. (2018). Bedford v. Canada: A breakthrough in the legal discourse. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 47-56). UBC Press.
- Bell, P. (2004). Content analysis of visual images. In T. Van Leeuwen, & C. Jewitt (Eds.), *The handbook of visual analysis* (pp. 1-34). SAGE Publications, Ltd.
- Benoit, C., Smith, M., Jansson, M., Healey, P., & Magnuson, D. (2018). ‘The prostitution

- problem': Claims, evidence, and policy outcomes. *Archives of Sexual Behaviour*, 48, 1905-1923.
- Berg, H. (2014). Working for love, loving for work: Discourses of labour in feminist sex work activism. *Feminist Studies*, 40(3), 693-721.
- Bill C-36, *Protection of Communities and Exploited Persons Act*, SC 2014, c. 25.
- Bindel, J. (2017). *The pimping of prostitution: Abolishing the sex work myth*. London: Palgrave Macmillan.
- Blom, T. (2024). My body, my choice: The hostile appropriation of feminist cultural memory in American anti-vaccine movements. *Memory Studies*, 17(5), 1089-1104.
- Boone, A. (2016, February 7). The alluring history of fishnets. *Medium*.  
<https://medium.com/this-tailored-life/the-alluring-history-of-fishnets-5d92da9e6407>
- Bosworth, M. (1999). *Engendering resistance: Agency and power in women's prisons*. Ashgate Publishing.
- Bosworth, M., & Carrabine, E. (2001). Reassessing resistance: Race, gender and sexuality in prison. *Punishment and Society*, 3(4), 501-515.
- Brest, P., & Vandenberg, A. (1987). Politics, feminism, and the constitution: The anti-pornography movement in Minneapolis. *Stanford Law Review*, 39(3), 607-661.
- Bristow, J. (1990). [Review of the book *Myths of sexuality: Representation of women in Victorian Britain.*, by L. Nead]. *Textual Practice*, 279-286.
- Brock, D. (1998). *Making work, making trouble: Prostitution as a social problem*. University of Toronto Press.
- Bruckert, C. (2015). Protection of communities and exploited persons act: Misogynistic law making in action. *Canadian Journal of Law and Society*, 30(1), 1-3.

- Bruckert, C., & Chabot, F. (2010). *Challenges: Ottawa area sex workers speak out*. Prostitutes of Ottawa/Gatineau Work, Educate and Resist.
- Bruckert, C., & Hannem, S. (2013). Rethinking the prostitution debates: Transcending structural stigma in systemic responses to sex work. *Canadian Journal of Law and Society*, 28(1), 43-63.
- Bunch, M. (2014). Communicating for the purposes of human rights: Sex work and discursive justice in Canada. *Canadian Journal of Human Rights*, 3(1), 39-74.
- Buntman, F. (2019). Prison and law, repression and resistance: Colonialism and beyond. *Journal of Imperial and Commonwealth History*, 47(2), 213-246.
- Butler, J. (1990). *Gender trouble: Feminism and the subversion of identity*. Routledge.
- Butler, J. (1993). *Bodies that matter: The discursive limits of "sex"*. Routledge.
- Butler, J. (2004). *Precarious life: The powers of mourning and violence*. London: Verso.
- Butler, J. (2015). *Notes toward a performative theory of assembly*. Harvard University Press.
- Cadena-Roa, J., & Puga, C. (2021). Protest and performativity. In S. Rai, M. Gluhovic, S. Jestrovic, & M. Saward (Eds.), *The Oxford handbook of politics and performance* (pp. 106-116). Oxford University Press.
- Campbell, A. (2015). Sex work's governance: Stuff and nuisance. *Feminist Legal Studies*, 23, 27-45.
- Campbell, W. C. (2014, June 15). *Sex workers take to Canada's streets to protest prostitution legislation*. The Globe and Mail. <https://www.theglobeandmail.com/news/politics/sex-workers-take-to-canadas-streets-to-protest-prostitution-legislation/article19177042/>
- Canada (Attorney General) v. Bedford*, 2013 SCC 72, [2013] 3 SCR 1101.
- Canadian Alliance Sex Work Law Reform. (2015a). *Criminalizing the purchase of sex: Impacts*

*and consequences*. [Fact Sheet]. <http://sexworklawreform.com/wp-content/uploads/2025/04/Purchase.pdf>

Canadian Alliance Sex Work Law Reform. (2015b). *Criminalizing advertising of sexual services: Impacts and consequences*. [Fact Sheet]. <http://sexworklawreform.com/wp-content/uploads/2025/04/Advertising.pdf>

Canadian Alliance Sex Work Law Reform. (n.d.). *About us*. <https://sexworklawreform.com>  
*Canadian Charter of Rights and Freedoms*, part 1 of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982* (UK), 1982, c. 11

Carrabine, E. (2005). Prison riots, social order and the problem of legitimacy. *Centre for Crime and Justice Studies*, 45, 896-913.

Case, B. S. (2019). Nonviolent civil resistance: Beyond violence and nonviolence in the age of street rebellion. In H. Johnston (Ed.), *Social movements, nonviolent resistance, and the state* (pp. 190-210). Routledge.

CBC News. (2011, October 3). *Wall Street protests take zombie turn*.

<https://www.cbc.ca/news/business/wall-street-protests-take-zombie-turn-1.996015>

Chambers, S. (2010). Pierre Elliot Trudeau and Bill C-150: A rational approach to homosexual acts, 1968-69. *Journal of Homosexuality*, 57, 249-266.

Chateauvert, M. (2013). *Sex workers unite: A history of the movement workers from stonewall to slut walk*. Boston, MA: Beacon Press.

Chaudhary, N., & Valsiner, J. (2017). Rhythms of resistance: A way forward. In N. Chaudhary, P. Hviid, G. Marsico, & J. W. Villadsen (Eds.), *Resistance in everyday life: Constructing cultural experiences* (pp. 319-328). Springer.

Clement, M. (2016). *A people's history of riots, protest and the law: The sound of the crowd*.

London: Macmillian Publishers.

Cohen, S. (2002). *Folk devils and moral panics* (3rd ed.). Routledge.

Cohen, S. (2019, January 21). Our bodies, our business: Sascha Cohen reviews “revolting prostitutes: the fight for sex workers’ rights. *Los Angeles Review of Books*.

<https://lareviewofbooks.org/article/our-bodies-our-business/>

Collins, B. G. (1990). Pornography and social policy: Three feminist approaches. *Affilia*, 5(4), 8-26

Comella, L. (2015). Revisiting the feminist sex wars. *Feminist Studies*, 41(2), 437-462.

Crago, A. L., & Clamen, J. (2013). Ne dans le redlight: The sex workers’ movement in Montreal. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 147-164). UBC Press.

Cresswell, T. (1996). *In place/out of place: Geography, ideology, and transgression*. University of Minnesota Press.

Crewe, B. (2007). Power, adaptation and resistance in a late-modern men’s prison. *Centre for Crime and Justice Studies*, 47, 256-275.

*Criminal Code*, R.S.C 1970, c. C-34.

*Criminal Code*, R.S.C 1985, c. C-46.

Culhane, D. (2003). Their spirits live within us: Aboriginal women in Downtown Eastside Vancouver emerging into visibility. *American Indian Quarterly*, 27(3-4), 593-606.

Davidson, T. (2014, June 14). *Toronto sex workers protest new prostitution legislation*. Toronto Sun. <https://torontosun.com/2014/06/14/toronto-sex-workers-protest-new-prostitution-legislation>

Davis, S., & Bowen, R. (2007). *Developing capacity for change: Cooperative development*

*exploration report*. BC Coalition of Experiential Communities.

Davis, S., & Bowen, R. (2019). Controlling our destinies: How the BC coalition of experiential communities (BCCEC) shaped sex worker rights organizing in Vancouver, British Columbia. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 139-161). ARP Books.

Department of Justice Canada. (2017). *Technical paper: Bill C-36, Protection of Communities and Exploited Person's Act*. Government of Canada. <https://www.justice.gc.ca/eng/rp-pr/other-autre/protect/p1.html>

Department of Justice Canada. (2023). *Prostitution criminal law reform: Bill C-36, the Protection of Communities and Exploited Persons Act*. Government of Canada. [https://www.justice.gc.ca/eng/rp-pr/other-autre/c36fs\\_fi/c36fs\\_fi\\_eng.pdf](https://www.justice.gc.ca/eng/rp-pr/other-autre/c36fs_fi/c36fs_fi_eng.pdf)

Department of Justice Canada. (2024). *Section 2(d) – freedom of association*. Government of Canada. <https://www.justice.gc.ca/eng/csjs-jc/rfc-dlc/ccrf-ccd1/check/art2d.html>

Drew, J. (1998). Cultural composition: Stuart Hall on ethnicity and the discursive turn. *JAC*, *18*(2), 171-196.

Duff, P., Shoveller, J., Chettiar, J., Feng, C., Nicoletti, R., & Shannon, K. (2015). Sex work and motherhood: Social and structural barriers to health and social services for pregnant and parenting street and off-street sex workers. *Health Care for Women International*, *36*, 1039-1055.

Durisin, E. M., van der Meulen, E., & Bruckert, C. (2018). Contextualizing sex work: Challenging discourses and confronting Narratives. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 3-24). UBC Press.

- Dutt, B. (2021). Performance gestures at protests and other sites. In S. Rai, M. Gluhovic, S. Jestrovic, & M. Saward (Eds.), *The Oxford handbook of politics and performance* (pp. 517-530). Oxford University Press.
- Dworkin, A. (1993). Prostitution and male supremacy. *Michigan Journal of Gender & Law*, 1(1), 1-12.
- Ellerby, J. M. (2015). *Embroidering the scarlet A: Unwed mothers and illegitimate children in American fiction and film*. University of Michigan Press.
- Elizabeth Fry Society of Toronto. (1987). *Street work outreach with adult female street prostitutes*. Public Safety Canada.  
<https://www.publicsafety.gc.ca/lbrr/archives/hq%20150.t67%20e45%201987-eng.pdf>
- Emmison, M. (2004). The conceptualization and analysis of visual data. In D. Silverman (Ed.), *Qualitative research: Theory, method and practice* (2nd ed.) (pp. 246-265). SAGE Publications.
- Emmison, M., & Smith, P. (2000). *Researching the visual: Images, objects, contexts and interactions in social and cultural inquiry*. SAGE Publications.
- European Sex Workers Rights Alliance. (n.d.). *About ESWA*.  
[https://www.eswalliance.org/about\\_eswa](https://www.eswalliance.org/about_eswa)
- Eyerman, R. (2006). Performing opposition or, how social movements move. In J.C. Alexander, G. Bernhard, & J. L. Mast (Eds.), *Social movements: Symbolic action, cultural pragmatics, and ritual* (pp. 193-217). Cambridge University Press.
- Fahs, B. (2022). *Unshaved: Resistance and revolution in women's body hair politics*. University of Washington Press.
- Faulkner, S. (2023, September 4). The raised fist: A history of the symbol. *People's History*

*Museum*. <https://phm.org.uk/blogposts/the-raised-fist-a-history-of-the-symbol/>

Feder, E. K. (2011). Power/knowledge. In Taylor, D. (Ed.). *Michel Foucault: Key concepts* (pp. 55-68). Acumen Publishing Limited.

Foucault, M. (1972). *The archaeology of knowledge and discourse on language*. (A. M. Sheridan Smith, Trans.). New York: Pantheon Books. (Original work published 1969).

Foucault, M. (1978). *The history of sexuality. Volume I: An introduction* (R. Hurley, Trans.). New York: Pantheon Books. (Original work published 1976).

Foucault, M. (1977). *Discipline and punish: The birth of the prison*. (A. Sheridan, Trans.). New York: Random House. (Original work published 1975).

Foucault, M. (1980). *Power/knowledge: Selected interviews and other writings, 1972 to 1977* (C. Gordon, Ed.). (E. Gordon, L. Marshall, J. Mepham, & K. Soper, Trans.). New York: Pantheon Books.

Galbally, P. (2016). Playing the victim: A critical analysis of Canada's Bill C-36 from an international human rights perspective. *Melbourne Journal of International Law*, 17(1), 1-23.

Gall, G. (2014). Collective interest organization among sex workers. In C. R. Showden & S. Majic (Eds.), *Negotiating sex work* (pp. 221-241). University of Minnesota Press.

Gao, H. (2018). An analysis of symbolic images in the scarlet letter. *Theory and Practice in Language Studies*, 8(12), 1725-1731.

Generations of Stelliennes at Stella, l'aime de Maimie. (2019). Stella, l'aime de Maimie: Creating space and movement for working women. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 262-288). ARP Books.

Gengler, A. M. (2012). Defying (dis)empowerment in a battered women's shelter: Moral

- rhetorics, intersectionality, and processes of control and resistance. *Social Problems*, 59(4), 501-521.
- Gibson, L., & Goldstein, T. (2007). *Living in community: Balancing perspectives on Vancouver's sex industry*. Living in Community.
- Gillies, K., & Bruckert, C. (2018). Pimps, partners and procurers: Criminalizing street-based sex workers' relationships with partners and third parties. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 82-93). UBC Press.
- Goodyear, M., & Auger, C. (2013). Regulating women's sexuality: Social movements and internal exclusion. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 211-229). UBC Press.
- Gray, J. (1971). *Red lights on the prairies*. Macmillan of Canada.
- Gregg, N. (1993). "Trying to put first things first:" Negotiating subjectivities in a workplace organizing campaign. In S. Fisher & K. Davis (Eds.), *Negotiating at the margins: The gendered discourses of power and resistance* (pp. 172-204). Rutgers University Press.
- Green, N. (2021, February 23). Struggle, solidarity, power: The history of the iconic raised fist. <https://www.nicolagreen.com/blog/struggle-solidarity-power-the-history-of-the-iconic-raised-fist>
- Haugaard, M. (2022). Foucault and power: A critique and retheorization. *Critical Review*, 34(3/4), 341-371.
- Hall, S. (1997). *Representation: Cultural representations and signifying practices*. The Open University.
- Hannem, S., & Bruckert, C. (2013). Legal moralism, feminist rhetoric, and the criminalization of

- consensual sex in Canada. *Women and the Law*, 318-343.
- Hawthorne, N. (1851). *The scarlet letter: A romance*. Boston: Ticknor, Reed, and Fields.
- Heath, C., Hindmarsh, J., & Luff, P. (2010). *Video in qualitative research: Analysing social interaction in everyday life*. SAGE Publications.
- Heath, M., Braimoh, J., & Gouweloos, J. (2016). Judging women's sexual agency: Contemporary sex wars in the legal terrain of prostitution and polygamy. *Journal of Women in Culture and Society*, 42(1), 199-225.
- Heuer, C. A., McClure, K. J., & Puhl, R. M. (2011). Obesity stigma in online news: A visual content analysis. *Journal of Health Communication*, 16(9), 976-987.
- Hollander, J. A., & Einwohner, R. L. (2004). Conceptualizing resistance. *Sociological Forum*, 19(4), 533-554.
- Hudson, G. & van der Meulen, E. (2013). Sex work law, and violence: Bedford v. Canada and the human rights of sex workers. *Windsor Yearbook Access to Justice*, 31(1), 115-145.
- Hughes, D. M., Mladjenović, L., & Mršević, Z. (1995). Feminist resistance in Serbia. *The European Journal of Women's Studies*, 2, 509-532.
- Hunt, A. (1997). Moral regulation and making-up the new person: Putting Gramsci to work. *Theoretical Criminology*, 1(3), 275-301.
- Hunt, A. (2002). Regulating heterosocial space: Sexual politics in the early twentieth century. *Journal of Historical Sociology*, 15(1), 1-34.
- Jeffrey, L. (2004). Prostitution as public nuisance: Prostitution policy in Canada. In J. Outshoorn (Ed.), *The politics of prostitution: Women's movements, democratic states and the globalisation of sex commerce* (pp. 83-102). Cambridge University Press.
- Jenness, V. (1990). From sex as sin to sex as work: Coyote and the reorganization of

- prostitution as social problem. *Social Problems*, 37(3), 403-420.
- Johansson, A., & Vinthagen, S. (2016). Dimensions of everyday resistance: An analytical framework. *Critical Sociology*, 42(3), 417-435.
- Johnson, G. F. (2014). Governing sex work: An agonistic policy community and its relational dynamics. *Critical Policy Studies*, 1-19.
- Khan, U. (2018). From average joe to deviant john: The changing construction of sex trade clients in Canada. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 67-81). UBC Press.
- Kim, J. L., Bay-Cheng, L. Y., & Ginn, H. G. (2022). Picturing sexual agency: A visual content analysis of adults' sexual stereotypes of young women. *Sex Roles*, 87, 565-582.
- Kissil, K., & Davey, M. (2010). The prostitution debate in feminism: Current trends, policy and clinical issues facing an invisible population. *Journal of Feminist Family Therapy*, 22(1), 1-21.
- Koken, J. A. (2010). The meaning of the 'whore': How feminist theories on prostitution shape research on female sex workers. In M. H. Ditmore, A. Levy, & A. Willman (Eds.), *Sex work matters: Exploring money, power and intimacy in the sex industry* (pp. 28-64). Zed Books.
- Kong, F. Y. J. (2021). *Soundscapes of feminist protests in London: Collective identity construction through sonic resonance*. [Doctoral dissertation, London School of Economics and Political Science].
- Krüsi, A., Belak, B., & Sex Workers United Against Violence. (2018). "Harassing the clients is

- exactly the same as harassing the workers”: Street-based sex workers in Vancouver. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 213-223). UBC Press.
- Krüsi, A., Pacey, K., Bird, L., Taylor, C., Chettiar, J., Allan, S., Bennett, D., Montaner, J. S., Kerr, T., & Shannon, K. (2014). Criminalization of clients: Reproducing vulnerabilities for violence and poor health among street-based sex workers in Canada – a qualitative study. *BMJ Open*, 4, 1-10.
- Kubal, T., & Becerra, R. (2014). Social movements and collective memory. *Sociology Compass*, 8(6), 865-875.
- Kunreuther, L. (2018). Sounds of democracy: Performance, protest, and political subjectivity. *Cultural Anthropology*, 33(1), 1-31.
- Lam, E. (2018). *Behind the rescue: How anti-trafficking investigations and policies harm migrant workers*. Butterfly Print.  
[https://www.butterflysw.org/\\_files/ugd/5bd754\\_bbd71c0235c740e3a7d444956d95236b.pdf](https://www.butterflysw.org/_files/ugd/5bd754_bbd71c0235c740e3a7d444956d95236b.pdf)
- Lam, E., Sun, N., & Milliken, S. (2019). From caterpillar to butterfly: The birth of a migrant sex workers’ organization in Canada. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 206-219). ARP Books.
- Law, T., & Bruckert, C. (2016). The surveillance web: Surveillance, risk, and resistance in Ontario strip clubs. In E. van der Meulen & R. Heynen (Eds.), *Expanding the gaze: Gender and the politics of surveillance* (pp. 253-317). University of Toronto Press.
- Leavy, P. L. (2007). The feminist practice of content analysis. In S. Hesse-Biber, P. L. Leavy (Eds.), *Feminist research practice: A primer* (pp. 223-248). Sage Publications, Inc.

- Legislative Committee on Bill C-49. (1985, September 19 & October 10). *Minutes of proceedings and evidence of the Legislative Committee on Bill C-49: An Act to amend the Criminal Code (prostitution)* (Issue No. 1). House of Commons, Canada.
- Lewis, J., Shaver, F. M., & Maticka-Tyndale, E. (2013). Going 'round again: The persistence of prostitution-related stigma. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 211-229). UBC Press.
- Lilja, M., Baaz, M., & Vinthagen, S. (2015). Fighting with and against the time: The Japanese environmental movement's queering of time as resistance. *Journal of Civil Society*, 11(4), 408-423.
- Lodi, M. (2021, August 2). Here's to the stripper heel. *Buzzfeed News*.  
<https://www.buzzfeednews.com/article/mariemlodi/stripper-heels-history>
- Loizos, P. (2000). Video, film, and photographs as research documents. In M. W. Bauer, & G. Gaskell (Eds.), *Qualitative researching with text, image, and sound* (pp. 94-107). SAGE Publications, Ltd.
- Love, V. (2018). Champagne, strawberries, and truck-stop motels: On subjectivity and sex work. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 181-188). UBC Press.
- Lowman, J. (1986). Prostitution in Vancouver: Some notes on the genesis of a social problem. *Canadian Journal of Criminology*, 28(1), 1-16.
- Lowman, J. (1989). *Street prostitution: Assessing the impact of the law*. Department of Justice Canada. [https://publications.gc.ca/collections/collection\\_2022/jus/J23-7-2-1989-eng.pdf](https://publications.gc.ca/collections/collection_2022/jus/J23-7-2-1989-eng.pdf)
- Lowman, J. (1998). Prostitution law reform in Canada. *Toward Comparative Law in the 21<sup>st</sup>*

*Century*, 1-23.

Lowman J. (2000). Violence and the outlaw status of (street) prostitution in Canada. *Sage Publications*, 6(9), 987-1011.

Lowman, J. (2013). Crown expert witness testimony in *Bedford v. Canada*: Evidence-based argument or victim-paradigm hyperbole? In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 230-250). UBC Press.

Lowman J., & Fraser, L. (1995). *Violence against persons who prostitute: The experience in British Columbia*. Department of Justice Canada.

[https://publications.gc.ca/collections/collection\\_2014/jus/J3-7-1996-14-eng.pdf](https://publications.gc.ca/collections/collection_2014/jus/J3-7-1996-14-eng.pdf)

Lynch, R. A. (2011). Foucault's theory of power. In D. Taylor (Ed.), *Michel Foucault: Key concepts* (pp. 13-26). Acumen Publishing Limited.

MacDonald, G., Jeffrey, L. A., Martin, K., & Ross, R. (2013). Stepping all over the stones: Negotiating feminism and harm reduction in Halifax. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 165-180). UBC Press.

Mackenzie, K., & Ham, J. (2019). SWAN Vancouver: Supporting immigrant and migrant women in the sex industry. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 104-117). ARP Books.

MacKinnon, C. (1989). *Toward a feminist theory of the state*. Harvard University Press.

MacKinnon, C. (2011). Trafficking, prostitution, and inequality. *Harvard Civil Rights-Civil Liberties Law Review*, 46, 271-309.

Maggie's (2019). Maggie's: Toronto Action Project. In A. Lebovitch & S. Ferris (Eds.), *Sex*

- work activism in Canada: Speaking out, standing up* (pp. 220-231). ARP Books.
- Mathieu, L. (2003). The emergence and uncertain outcomes of prostitutes' social movements. *The European Journal of Women's Studies*, 10(1), 29-50.
- McAdam, D. (1982). *Political process and the development of Black insurgency, 1930-1970*. (2nd ed). University of Chicago Press.
- McCotter, S. S. (2001). The journey of a beginning researcher. *The Qualitative Report*, 6(2), 1-24.
- McEvoy, K. (2001). *Paramilitary imprisonment in Northern Ireland*. Oxford University Press.
- McKenna, E. (2022). The white-painters of Cabbagetown: Neighborhood policing and sex worker resistance in Toronto, 1986-1987. *Sexualities*, 25(7), 867-891.
- McHoul, A., & Grace, W. (1993). *A Foucault primer: Discourse, power and the subject*. Melbourne University Press.
- McLaren, J. (1986). Chasing the social evil: Moral fervour and the evolution of Canada's prostitution laws, 1867-1917. *Cambridge University Press*, 1, 125-165.
- McLaren, J. (1995). Recalculating the wages of sin: The social and legal construction of prostitution, 1850-1920. *Manitoba Law Journal*, 23, 524-555.
- Mellor, M. (2024). A brief history of the colour red. *Arts & Collections*.  
<https://www.artsandcollections.com/article/a-history-of-the-colour-red/>
- Mensah, M. N., Toupin, L., Leduc, V., Gauvin, M., Barraud, S., Marceau, J., Nepton, N., & Vallee, M. Alliance féministe solidaire pour les droits des travailleuses et travailleurs du sexe (AFS) – courte histoire. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 302-313). ARB Books.
- Messerschmidt, J. (1987). Feminism, criminology, and the rise of the female 'delinquent,' 1880-

1930. *Contemporary Crises*, 11, 243-263.
- Millar, H., & O'Doherty, T. (2020). Racialized, gendered, and sensationalized: An examination of Canadian anti-trafficking laws, their enforcement, and their (re)presentation. *Canadian Journal of Law and Society*, 35(1), 23-44.
- Montalvo, D. (2021, June 2). How AIDS activists used 'die-ins' to demand attention to the growing epidemic. *History Channel*. <https://www.history.com/articles/aids-activism-protests-act-up-die-ins>
- Mooney, H. (2018, June 9). *Red umbrella march celebrates history of Vancouver sex workers*. Vancouver Sun. <https://vancouversun.com/news/local-news/red-umbrella-march-celebrates-history-of-vancouver-sex-workers>
- Munn, M. (2014). Epistemological violence, psychological whips, and other moments of angst: Reflections on PhD research. In S. C. Fabian, M. Felices-Luna, & J. M. Kilty (Eds.), *Demarginalizing voices: Commitment, emotion, and action in qualitative research* (pp. 295-314). UBC Press.
- Munn, M., & Bruckert, C. (2010). Beyond conceptual ambiguity: Exemplifying the 'resistance pyramid' through the reflections of (ex) prisoners agency. *Qualitative Sociology Review*, 6(2), 137-149).
- Naegler, L. (2021). Resistance and the radical imagination: A reflection on the role of the critical criminologist in social movements. *Critical Criminology*, 30, 225-235.
- Nault, C. (2018). *Queercore: Queer punk media subculture*. Routledge.
- Nead, L. (1988). *Myths of sexuality: Representation of women in Victorian Britain*. Basil Blackwell, Ltd.
- Nelson, T. E., Oxley, Z. M., & Clawson, R. A. (1997). Toward a psychology of framing effects.

*Political Behaviour*, 19(3), 221-246.

Nipissing University. (2018). *Project ArmHer performance coming to NU*.

<https://www.nipissingu.ca/news/2018/project-armher-performance-coming-nu>

Nilsen, D. (1980). The 'social evil': Prostitution in Vancouver, 1900-1920. *In Her Own Right:*

*Selected Essays on Women's History in B.C.*, Camosun College, Victoria, 1980. (pp. 205-228).

NWSP. (2016). *National Day of Action*. Global Network of Sex Work Projects.

<https://www.nswp.org/news/national-day-action-canada>

NWSP. (2021, October 22). *Twenty years of activism under red umbrellas*. Global Network of

Sex Work Projects. <https://www.nswp.org/news/twenty-years-activism-under-red-umbrellas>

NWSP. (2025). *History*. Global Network of Sex Work Projects. <https://www.nswp.org/history>

O'Connell, S. (1988). The impact of Bill C-49 on street prostitution: "What's law got to do with it." *Journal of Law and Social Policy*, 4(4), 109-145.

O'Doherty, T., & Millar, H. (2024). Prosecuting trafficking in persons offences: Problems and pitfalls in the post-PCEPA era. In K. Roots, A. De Shalit, & E. van der Meulen (Eds.), *Trafficking harms: Critical politics, perspectives, experiences* (pp. 82-97). Fernwood Publishing.

O'Malley, K. (2014, September 10). Terri-Jean Bedford kicked out of prostitution bill hearing.

*CBC News*. <https://www.cbc.ca/news/politics/terri-jean-bedford-kicked-out-of-prostitution-bill-hearing-1.2761325>

Orie, A. (2024, June 1). Canadian serial killer Robert Pickton dies aged 74 after prison assault.

*CNN*. <https://www.cnn.com/2024/06/01/americas/serial-killer-robert-pickton-dies-intl>

- Oksala, J. (2011). Freedom and bodies. In Taylor, D. (Ed). *Michel Foucault: Key concepts* (pp. 85-98). Acumen Publishing Limited.
- Page, M. (2018). Fighting for Homewood: Gentrification and the history of violent struggle over trans sex workers' strolls in Canada. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 272-280). UBC Press.
- Parent, C., & Bruckert, C. (2012). The current debate on sex work. In C. Parent, C. Bruckert, M. Mensah, P. Corriveau, & L. Toupin (Eds.), *Sex work: Rethinking the job, respecting the workers* (pp. 9-29). UBC Press.
- Parry, K. (2020). Quantitative content analysis of the visual. In L. Pauwels, & D. Mannay (Eds.), *The SAGE handbook of visual research methods* (2nd Ed.) (pp. 352-366). SAGE Publications, Ltd.
- Pastoureau, M. (2000). *Red: The history of colour*. Princeton University Press.
- Paterson, J. (2019). Peers Victoria: 20 years of community, support, and activism by and for sex workers. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 36-49). ARP Books.
- Pepper Development. (2024, April 22). Cultural significance of feather boas in various societies. *Fancy Feather*. <https://fancyfeather.com/blogs/fancy-blog/cultural-significance-of-feather-boas-in-various-societies#:~:text=Feather%20boas%2C%20specifically%2C%20are%20part,great%20personal%20and%20communal%20significance.>
- Perry, S. L., & McElroy, E. E. (2021). Protection or patriarchy? Gender ideology and support for

- anti-pornography legislation, 1988-2018. *Sexuality Research and Social Policy*, 19, 233-247.
- Piderit, S. K. (2000). Rethinking resistance and recognizing ambivalence: A multidimensional view of attitudes toward an organizational change. *Academy of Management Review*, 25(4), 783-794.
- Pietrass, M. (2009). Digital literacy as “framing”: Suggestions for an interactive approach based on E. Goffman’s frame theory. *Digital Kompetanse*, 3(4), 131-142.
- Piven, F. F. (2012). Protest movements and violence. In S. Seferiades & H. Johnston (Eds.), *Violent protest, contentious politics, and the neoliberal state* (pp. 19-28). Farnham, UK: Ashgate.
- Pivot Legal Society (n.d.). *Our story: Who we are*. [https://www.pivotlegal.org/our\\_story](https://www.pivotlegal.org/our_story)
- Pivot Legal Society. (2004). *Voices for dignity: A call to end the harms caused by Canada’s sex trade laws*. Pivot Legal Society Sex Work Subcommittee.  
<https://assets.nationbuilder.com/pivotlegal/pages/85/attachments/original/1345748515/voicesfordignity.pdf?1345748515>
- Poulantzas, N. (1978). *State, power, socialism*. London: Verso.
- Prosser, J., & Schwartz, D. (2004). Photographs within the sociological research process. In S. Hesse-Biber, & P. Leavy (Eds.), *Approaches to qualitative research: A reader on theory and practice* (pp. 334-349). Oxford University Press.
- Purvis, L., Bruckert, C., & Chabot, F. (2015). *The toolkit: Ottawa area sex workers speak out*. Prostitutes of Ottawa/Gatineau Work, Educate and Resist.
- R v. Hutt* [1978] 2 SCR 476
- R v. Skinner* (1987) 79 N.S.R. (2d) 8 (CA)

*R v. Skinner* [1990] 1 SCR 1235

Rabinovitch, J., & Strega, S. (2004). The PEERS story: Effective services sidestep to the controversies. *Violence Against Women*, 10(2), 140-159.

Raby, R. (2005). What is resistance? *Journal of Youth Studies*, 8(2), 151-171.

Raven. (2017). Once upon a time. In PACE Society (Ed.), *Sex worker wisdom: A collection of poetry and prose by sex workers in Vancouver* (pp. 22-23). PACE Society.

Reavey, P., & Johnson, K. (2017). Visual approaches: Using and interpreting images. In C. Willig & W. Stainton-Rogers (Eds.), *The SAGE handbook of qualitative research in psychology* (pp. 354-372). SAGE Publications.

Red Umbrella Fund. (2022). *International committee on the rights of sex workers (ICRSE)*.  
<https://www.redumbrellafund.org/grantees/icrse-3/>

Redwood, R. (2018). Myths and realities of male sex work: A personal perspective. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 167-180). UBC Press.

Reinharz, S. (1992). *Feminist methods in social research*. Oxford University Press.

Renegade, R. & Pottenger, K. (2019). Sex work is work. *New Labour Form*, 28(1), 98-102.

Rodrigues, A. I. (2018). Insights and perspectives about textual with visual data analysis: The use of photos as an example. In A. P. Costa, P. L. Reis, F. N. Souza, A. Moreira. (Eds.), *Computer supported qualitative research* (pp. 291-305). Springer International Publishing.

Roots, K. (2022). *The domestication of human trafficking: Law, policing, and prosecution in Canada*. University of Toronto Press.

Rose, G. (2001). *Visual methodologies: An introduction to the interpretation of visual materials*.

SAGE Publications.

Rose, D. (2004). Analyses of moving images In S. Hesse-Biber, & P. Leavy (Eds.), *Approaches to qualitative research: A reader on theory and practice* (pp. 350-366). Oxford University Press.

Ross, B. (2010). Sex and (evacuation from) the city: The moral and legal regulation of sex workers in Vancouver's west end, 1975-1985. *Sexualities*, 13(2), 197-218.

Ross, B. (2018). Whorganizers and gay activists. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 256-271). UBC Press.

Ross, B., & Sullivan, R. (2012). Tracing lines of horizontal hostility: How sex workers and gay activists battled for space, voice, and belonging in Vancouver, 1975-1985. *Sexualities*, 15(5/6), 604-621.

Rowe, K. K. (1990). Roseanne: unruly women as domestic goddess. *Screen*, 31(4), 408-409.

Rubin, J. W. (1996). Defining resistance: Contested interpretations of everyday acts. *Studies in Law, Politics, and Society*, 15, 237-260.

Russell, J. (1982). The offence of keeping a common bawdy-house in Canadian criminal law. *Ottawa Law Review*, 14, 270-313.

Russo, M. (1986). Female grotesques: Carnival and theory. In T. de Laurentis (Ed.), *Feminist studies: Critical studies* (pp. 213-229). Indiana University Press.

San Francisco Bay Area Sex Worker Film & Arts Festival (n.d.). *About sex worker fest.*

<http://sexworkerfest.com/about/festival>

Sangster, J. (2001). *Regulating girls and women: Sexuality, family, and the law in Ontario, 1920-1960*. Oxford University Press.

- Schaefer, G. (2016, September 17). *West End sex workers honoured with memorial*. Vancouver Sun. <https://vancouversun.com/news/local-news/west-end-sex-workers-honoured-with-memorial>
- Scheiner, G. (2001). Look at me, I'm Sandra Dee: Beyond a white, teen icon. *Journal of Women's Studies*, 22(2), 87-106.
- Scott, J. C. (1985). *Weapons of the weak: Everyday forms of peasant resistance*. Yale University Press.
- Scott, J. C. (1990). *Domination and the arts of resistance: Hidden transcripts*. Yale University Press.
- Scott, V. (2019). Whoreistory: Time capsules of Toronto sex work activism, 1983 to 1998. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 232-261). ARP Books.
- Scoular, J. (2010). What's law got to do with it?: How and why law matters in the regulation of sex work. *Journal of Law and Society*, 37(1), 12-39.
- Secomb, L. (2008). Words that matter: Reading the performativity of humanity through Butler and Blanchot. In B. Davis (Ed.), *Judith Butler in conversation: Analyzing the text and talk of everyday life* (pp. 145-162). Routledge.
- Sex Workers' Rights Advocacy Network. (n.d.). *The red umbrella: History in the making*. <https://swannet.org/the-red-umbrella-history-in-the-making/#:~:text=The%20Red%20Umbrella%3A%20History%20in%20the%20making%20%2D%20SWAN&text=More-.The%20red%20umbrella%20was%20used%20by%20sex%20workers%20of%20Venice,streets%20together%20out%20and%20proud.>

- Shannon, E., Zangger, C., & Arthur, J. (2019). FIRST history: A passion for organizing. In A. Lebovitch & S. Ferris (Eds.), *Sex work activism in Canada: Speaking out, standing up* (pp. 65-77). ARP Books.
- Shannon, K., Kerr, T., Allinott, S., Chettiar, J., Shoveller, J., & Tyndall, M. (2008). Social and structural violence and power relations in mitigating HIV risk of drug-using women in survival sex work. *Social Science & Medicine*, *66*, 911-921.
- Shaver, F. M. (1994). The regulation of prostitution: Avoiding the morality traps. *Cambridge University Press*, *9*(1), 123-145.
- Shaver, F. M. (2019). 'The prostitution problem': Why isn't evidence used to inform policy? *Archives of Sexual Behaviour*, *48*, 1955-1959.
- Shazly, I. E. (2022, June 29). Colors representations in different cultures. *Globalization Partners International*. <https://www.globalizationpartners.com/2022/06/29/colors-representations-in-different-cultures/>
- Short, K. G. (2019). Critical content analysis of visual images. In H. Johnson, J. Mathis, K. G. Short (Eds.), *Critical content analysis of visual images in books for young people* (pp. 3-22). Routledge.
- Singh, A., Richmond, K., & Burnes, T. (2013). Feminist Participatory Action Research with Transgender Communities: Fostering the Practice of Ethical and Empowering Research Designs. *International Journal of Transgenderism*, *14*(3), 93-104.
- Snow, N. M., Steely, M. K., & Bense, T. T. (2020). The right to life, liberty and security for prostitution: Canada v. Bedford. *Women & Criminal Justice*, 1-8.
- Snider, L. (1990). The potential of the criminal justice system to promote feminist concerns. *Studies in Law, Politics, and Society*, *10*, 143-172.

Sorfleet, A. (2019, September 15). Vancouver red umbrella march 2019 celebrate its 7th year!

*The Naked Truth*. [https://walnet.org/csis/news/vancouver\\_2019/nakedtruth-190915.html](https://walnet.org/csis/news/vancouver_2019/nakedtruth-190915.html)

Stamos, G. (Director). (2016). *Our bodies, our business*. [Film]. Triple-X Workers' Solidarity Association and Dalla Lana School of Public Health, University of Toronto.

Stephan, M. J., & Chenoweth, E. (2008). Why civil resistance works: The strategic logic of nonviolent conflict. *International Security*, 33(1), 7-44.

Sterling, A. (2018). New risk-spaces, new spaces for harm: The effects of the advertising offence on independent escorts. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 94-103). UBC Press.

Stoddard, C. (2016, January 19). Pasties and merkins – a history. *HuffPost*.

[https://www.huffpost.com/entry/pasties-and-merkinsa-hist\\_b\\_8994866](https://www.huffpost.com/entry/pasties-and-merkinsa-hist_b_8994866)

Stout, J. (2020, July 30). The history of the raised fist, a global symbol of fighting oppression.

*National Geographic*. <https://www.nationalgeographic.com/history/article/history-of-raised-fist-global-symbol-fighting-oppression>

Strong, M., & McLaren, K. (2013). Taking to the streets. In S. Maddison & M. Sawyer (Eds.), *The women's movement in protest, institutions and the internet: Australia in transnational perspective* (pp. 54-69). Routledge.

Swan, E. (2022). *Birds without wings: An exploration into the relationship between orientalism, liberal peacebuilding, resistance, and masculinities in the West Bank*. [Doctoral dissertation, University of Ottawa].

Take Back The Night. (2025). International history of TBTN.

<https://takebackthenight.org/history/>

Takeuchi, C. (2016, September 19). *City of Vancouver unveils West End sex workers memorial*.

- The Georgia Straight. <https://www.straight.com/news/785351/city-vancouver-unveils-west-end-sex-workers-memorial#>
- Tarrow, S. (1998). *Power in movement: Social movements and contentious politics*. (2nd ed). Cambridge University Press.
- The Criminal Code*, 1892, S.C. 1892, c. 29.
- Thorne, S. (2016). *Interpretive description: Qualitative research for applied practice* (2nd Ed.). Routledge.
- Tigchelaar, A. (2019). Sex worker resistance in the neoliberal creative city: An auto/ethnography. *Anti-Trafficking Review*, 12, 15-36.
- Tilly, C. (1978). *From mobilization to revolution*. Addison Wesley Publishing Company.
- Tilly, C. (2010). *Regimes and repertoires*. University of Chicago Press.
- Triple-X Workers' Solidarity Association of B.C (2014, June 17). *2nd annual red umbrella march for sex work solidarity*. <https://triple-x.org/about/redumbrella2014.html>
- Triple-X Workers' Solidarity Association of B.C (2018, December 10). *6th annual red umbrella march for sex work solidarity: Saturday, June 9*. <https://triple-x.org/about/redumbrella2018.html>
- Triple-X Workers' Solidarity Association of B.C (2019). *Red umbrella march: 35 years*. <https://triple-x.org/pdf/RUM35years2019.pdf>
- Useem, B., & Kimball, P. (1989). *States of siege: U.S. prison riots, 1971-1986*. Oxford University Press.
- van der Meulen, E. (2011). Sex work and Canadian policy: Recommendations for labour legitimacy and social change. *Sexuality Research and Social Policy*, 8, 348-358.
- van der Meulen, E., & Durisin, E. M. (2008). Why decriminalize?: How Canada's municipal and

- federal regulations increase sex workers' vulnerability. *Canadian Journal of Women and the Law*, 20(2), 289-311.
- van der Meulen, E., & Durisin, E. M., Love, V. (2013). Introduction. In E. van der Meulen, E. M. Durisin, & V. Love (Eds.), *Selling sex: Experience, advocacy, and research on sex work in Canada* (pp. 1-28). UBC Press.
- van der Meulen, E., & Durisin, E. M. (2018). Sex work policy: Tracing historical and contemporary developments. In E. M. Durisin, E. van der Meulen, & C. Bruckert (Eds.), *Red light labour: Sex work regulation, agency, and resistance* (pp. 27-47). UBC Press.
- Vanwesenbeeck, I. (2017). Sex work criminalization is barking up the wrong tree. *Archives of Sexual Behaviour*, 46, 1631-1640.
- Vinthagen, S., & Johansson, A. (2013). "Everyday resistance": Exploration of a concept and its theories. *Resistance Studies Magazine*, 1, 1-46.
- Walkowitz J. (2016). Politics of prostitution and sexual labour. *History Workshop Journal*, 82, 188-198.
- Walnet. (2000). Danny & the prostitutes' safe sex project.  
[https://www.walnet.org/97\\_walnut/danny\\_cockerline/dannyandpssp.html](https://www.walnet.org/97_walnut/danny_cockerline/dannyandpssp.html)
- Weitz, R. (2001). Women and their hair: Seeking power through resistance and accommodation. *Gender & Society*, 15(5), 667-686.
- Weitzer, R. (1991). Prostitutes' rights in the United States: The failure of a movement. *The Sociological Quarterly*, 32(1), 23-41.
- Weitzer, R. (2018). Resistance to sex work stigma. *Sexualities*, 21(5-6), 717-729.
- Women & The American Story (n.d.). Take Back the Night.

<https://wams.nyhistory.org/end-of-the-twentieth-century/a-conservative-turn/take-back-the-night/>