

Approaches Utilized in Other Jurisdictions

Model	Country	Legislative Approaches	Public Education/Awareness	Social Services	Enforcement Practices
Nordic Model	Sweden	- Prostitution (selling sex) is legalized 1999 Sex Purchase Act criminalizes - buying sex (pimping/profitting) - promoting or exploiting relations for payment - trafficking persons for the purposes of sexual exploitation - penalties range from fines to imprisonment in more serious cases - Aliens Act (Immigration law) - Foreign or migrant people can be deported without work permits - Municipal bylaws regulate noise/disturbance issues - Prosecutors are a national authority and can utilize arrest warrants - Non-swedish persons cannot sell sex legally	- Buying another person is stigmatized - Perception that prostitutes are a vulnerable group of women - All sex trade work is viewed as violence against women - Reducing demand will result in eliminating prostitution - School programs on gender equality - Criminalizing buyer and pimp targets individuals whom the government deems responsible for prostitution. - Focus on victim protection, prevention, prosecution and partnerships	Stockholm: - State run exit programs and poverty reduction measures prevent entry into the sex trade. - Outreach program for buyers - Programs to develop plans that include shelter, health needs, counselling for sex trade workers - Programs that provide linkages to mental health and addictions programs. - Programs established for police to increase understanding of the conditions that make women vulnerable - Volunteer street program in underground malls, strain stations to talk with teens and young adults Malmö: - Program provides support and counselling and support for sellers, buyers and families or relatives who have concerns - Outreach workers provide prevention packages (condoms, security guide) and work with police, probation and health. - Safe injection sites and drug addiction programs	Stockholm: - National police and municipal police (vice unit) work together with prosecutors and social services on human trafficking - Vice unit: - street presence, - conduct internet searches - works with sex trade workers to change lifestyle and investigations - works with outreach program for buyers (KAST) - provides training program to hotels to assist in identifying buyers and sellers Malmö: - CID Border police focus on human trafficking - CID Internet Operations Group monitor and analyze human trafficking - No dedicated vice unit - Enforcement practices similar to Stockholm
	Norway	- Prostitution (selling) is legalized - Norwegian General Civil Penal Code criminalizes - buying sex and pimping - human trafficking - penalties range from fines to imprisonment in more serious cases - Immigration laws - foreigners can be deported for breaches of peace	- Buying another person is stigmatized - Perception that prostitutes are a vulnerable group of women - All sex trade work is viewed as violence against women - Reducing demand will result in eliminating prostitution - School programs on gender equality - Criminalizing buyer and pimp targets individuals whom the government deems responsible for prostitution. - Focus on victim protection, prevention, prosecution and partnerships	Gothenburg: - State run exit programs and poverty reduction measures prevent entry into the sex trade. - Outreach program for buyers - Programs to develop plans that include shelter, health needs, counselling for sex trade workers - Programs that provide linkages to mental health and addictions programs. - Programs established for police to increase understanding of the conditions that make women vulnerable Gothenburg: - No dedicated vice unit - Resources work with prosecutors and social services at a municipal level - Prostitution appears to be taking place in hotels, apartments rather than on the street - Majority of selling/buying appears to include the use of internet and cell phones	- No dedicated vice unit - Police authorized to use wire-tapping to gain evidence - Human trafficking higher priority if identified - Citizens caught paying for prostitutes locally or abroad can face a hefty fine or six-month prison sentence

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Regulatory Model	Denmark	- Prostitution (selling) and buying is decriminalized - There are some laws against pimping and brothels - Immigrations laws are similar to Sweden and Norway	- General perception that prostitutes are a vulnerable group of women - Stronger view of human rights and independent choice - Most of the sex trade workers are foreign women	- Centre for foreign women funded through government and private donations - Focus on harm reduction (testing for STD's, HIV) - Shelters spaces - Live-in program provides social workers, teacher, support for exiting the trade - KAST program for buyers	Human Trafficking Unit focusing on younger girls
Regulatory Model	Switzerland	- Prostitution is legalized - Prostitution regulations fall under cantonal (state) and municipal jurisdiction - The Swiss Criminal Code sets fines for violators and prohibits inciting someone to become a prostitute against their will or preventing someone from quitting - Regulations vary across cantons with main focus on improving working conditions of sex workers and reduce the negative effects of the sex trade	- Prostitution is considered an ordinary form of economic activity - Increasing awareness of the need to criminalize clients - A National Action Plan to fight human trafficking was approved	- Non-Governmental Organizations (NGO's) report that the current regulations make it easier for them to reach victims of trafficking and carry out protection and registration activities - NGO's work in co-operation with law enforcement services - NGO's works closely with national anti-trafficking authorities and police to raise awareness and victim protection.	- Local police are responsible for trade and industry controls and inspection of sex trade activities - People paying for sex with minors may be sentenced up to 3 years of imprisonment; anyone inciting prostitution by minors will face up to 10 years
Regulatory Model	Netherlands	- Legalized prostitution - Laws which prohibited owning or managing a brothel have been lifted - Municipalities can regulate and control the sex trade through licensed brothels subject to health and safety regulations - Some Dutch municipalities have created zones of tolerance, "tippelzones," where street prostitution is permitted - The Penal Code punishes those who coerce or induce someone into prostitution municipalities are primarily responsible for regulating sex work within their boundaries. - For the vast majority of these communities (approximately 95%), prostitution is regulated through the issuing of licences - Ministry of Justice developed a handbook on prostitution, to help municipalities to develop their own policies for dealing with the sex industry. Some of the most common local regulations include: - restricting the number and location of brothels; - imposing criminal background checks on prospective owners and managers; - introducing stringent health, hygiene, and safety requirements; and - limiting whom brothel owners can employ - A draft bill which will introduce a series of restrictions on prostitution including raising the age to 21 years is currently being debated. - New legislation will make mandatory to register as a sex worker, people will also have to speak Dutch, English, German or Spanish; these requirements are aimed at making human trafficking more difficult.	- Between 50% and 90% licensed prostitutes work involuntarily - Link between prostitution and human trafficking has become increasingly strong. - Higher age limit may allow individual to make more responsible choices - About 25% of sex workers who receive the assistance of the prostitution health Centre in Amsterdam are male.	- Nurses, doctors and social workers provide needle exchanges, drop-in shower facilities, and advice to women who want to stop taking drugs or receive mental health treatment. - Addicted prostitutes are connected with social welfare benefits to help them leave the sex industry.	- Brothel owners and operators are to be held responsible for minors or illegal immigrants working in their establishments. - Penalties range from a warning, to a fine, to a temporary or permanent revocation of the licence. - In cases involving involuntary prostitution, the owner and/or operator can be charged under the Penal Code.

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Regulatory Model	New Zealand	- Prostitution (selling) is legalized - Prostitution Reform Act was created to: - protect sex workers from exploitation, and safeguard their human rights - promote the safety, health and welfare of sex workers - create a prostitution framework that is conducive to public health - prohibit the use in prostitution of persons under 18 - implement a licensing regime for brothels - Local governments may regulate advertising through bylaws - Occupational Health and Safety Codes have been expanded and inspectors have authority to enter premises to ensure compliance of regulations and ensure prostitutes and clients have adopted safe sex practices (eg. accessible free condoms and condoms are being used by the buyer). - Local government can implement zoning regulations - Brothels have to factor in employment rights and health/safety guidelines - Several cities have implemented regulations banning the location of prostitution establishments within the vicinity of schools, daycares, government buildings, and places of worship, as well as in residential areas.	- Treats the sex industry in a similar way to other sectors - Lower levels of exploitation		- Focus of prostitution-related policing is harm-related - Police and sex-worker relationships are improved
		Nevada - Legalized prostitution (except Las Vegas) only permitted in licensed brothels - All prostitutes must register with police and pass a mandatory HIV/STD test and - Regular monthly testing is enforced. - Brothels are subject to safety measures to protect prostitutes from customer violence. - Condom use and regular testing of prostitutes for sexually transmitted diseases such as HIV are required by law. - The Nevada Revised Statutes prohibits the operation of brothels within 400 yards of any school or place of worship.		- Polaris Project is a multicultural grassroots organization combating human trafficking and modern-day slavery. Based in the United States and Japan, their staff combine street-level experience and technical expertise, working everyday from morning to past midnight to provide victim services, conduct advocacy, and build the anti-trafficking movement. - Sex Workers Anonymous helps sex workers get out of the business and/or find recovery and support afterward. - MASIE (Minorities & Survivors Improving Empowerment) promotes education and awareness regarding sex-trafficking and prostitution. Provides public education and support for non-governmental agencies. Provides ongoing legal advocacy for immigrant victims of crime/trafficking and referral services to non-immigrant victims.	Police carry out monthly undercover sting operations
Regulatory Model	USA	Tennessee The Tennessee Code: - exchanging sex for money (or other items of value)-- is a Class B misdemeanor - prostitution committed within 100 feet of a church, or one-and-a-half miles of a school, is a Class A misdemeanor - pimping and promoting is a Class E felony activities include: - owning, controlling, managing, supervising, or in any way keeping, alone or in association with others, a business for the purpose of engaging in prostitution, or a house of prostitution - procuring an inmate for a house of prostitution - encouraging, inducing, or otherwise purposely causing another to become a prostitute - soliciting a person to patronize a prostitute - procuring a prostitute for a patron, and - soliciting, receiving, or agreeing to receive any benefit for engaging in any of these activities			

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Hybrid Regulatory Model	Germany	- Consensual "adult" prostitution is legalized - The Prostitution Act goal is to improve the legal and social status and working conditions - Legal contracts between prostitutes and clients can be established - Local authorities retain the right to establish exclusion zones in which sex work cannot be practised. - States Trade law regulate some aspects related to sex work by means of their respective states. - Sex workers are subject to taxation by the state, health and safety regulations and protection of employees' rights.	- Germany law recognizes prostitution as a legitimate employment choice - Germany has been labelled "Europe's biggest brothel" and has become a destination for sex tourism from many European countries. - Only 44% of prostitutes are registered for social insurance as private health companies would refuse to them as customers at reasonable rates due to the health risks linked to their work. - Sex workers become commodities - Even with legal contracts, brothel owners are only required to pay prostitutes daily wages regardless of how many customers. - Brothels launch a flat rate and customer can have unlimited sex with as many sex workers. - Prostitution has tripled over the last 20 years. - Over 50% of female workers have no permanent residence and travel from place to place. - Most sex workers are put under strong pressure from partners or family members to earn money.	- Certain non-governmental organizations runs cafés in the red-light district to provide support from isolation and a place to meet. - Organizations set up to help victims of trafficking and sex work leave prostitution.	- Reports indicate that law enforcement officers have almost no access to brothels and inspections by police require a specific reason. - A number of trafficking cases go undetected as people who have chosen to be employed as prostitutes work side by side with others who are forced. - The government has announced that brothels will be prohibited from offering flat rates in the revised legislation starting in April 2014.