

### **EU LGBTIQ Equality Strategy 2026-2030**

# European Sex Workers' Rights Alliance (ESWA) contribution to advance LGBTIQ Equality beyond 2025

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#### 1. Introduction

The European Sex Workers Rights Alliance (ESWA) is a network of sex workers' organisations representing over 111 groups in 30 countries across Europe and Central Asia. Over 50% of ESWA's member organisations are led by sex workers. The ESWA board and the majority of its staff are sex workers from a variety of backgrounds and with a range of experiences. ESWA aims to ensure that the voices of all sex workers are heard, and that their human, health and labour rights are recognised and protected.

In this feedback, ESWA focuses on a number of priority areas that are most relevant to our core mandate and summarise ESWA's key findings in the area of LGBTIQ sex workers' rights. Additionally, ESWA fully supports all the <u>priorities</u>, recommendations and legal, policy and budgetary <u>actions</u> identified by ILGA-Europe to protect and advance the fundamental rights of LGBTI people across all EU policy areas.

Sex work is a multi-gendered phenomenon, and sex workers of all genders and sexual orientations offer sexual services and are actively involved in the sex workers' rights movement.

The homophobic and transphobic social climate LGBTIQ individuals live in and the social marginalisation they face is one of the main reasons why many LGBTIQ people use sex work as a livelihood option. Members of the LGBTIQ community are likely to face rejection from their family, obstacles to access to education and employment in the heteronormatively arranged social structures. In many countries, they therefore have limited economic and employment opportunities. This is particularly true for trans women, LGBTIQ people of colour or of migrant status, and those who had to become economically independent at an early age without any support from their family.

#### 2. The Growing Recognition of LGBTIQ and Sex Workers' Rights

Historically, LGBTIQ and sex worker communities have shared common struggles and have stood together in the face of systemic repression. The Stonewall riots of 1969—widely commemorated as a turning point in the LGBTIQ rights movement—were led in large part by trans sex workers of colour, such as Marsha P. Johnson and Sylvia Rivera. This legacy continues to be honoured during Pride events across the globe.

In recent years, there has been increasing recognition across Europe and globally that the rights of LGBTIQ people and sex workers are interlinked, and that advancing equality in one area requires addressing the intersecting forms of stigma and exclusion experienced in the other. LGBTIQ people have long been active participants in the sex workers' rights movement, and sex workers of all genders and sexual orientations continue to be on the front lines of both struggles. This recognition is being affirmed not only by community-based organisations but also by regional advocacy bodies and human rights institutions<sup>1</sup>.

LGBTIQ individuals—particularly those who are trans, migrants, or racialised—often engage in sex work as a result of systemic social and economic exclusion (*Empowering LGBTI Sex Workers: Towards the Full Respect of Their Human Rights,* ILGA, 2018). Sex work is a multigendered phenomenon, involving people of all genders and sexual orientations, many of whom face significant barriers in other parts of the labour market due to stigma, discrimination, and lack of legal protection. Within this context, LGBTIQ sex workers require recognition both as part of the broader LGBTIQ community and as workers whose labour rights must be upheld. According to ILGA-Europe Policy Paper (2018) rights-based approach that prioritises self-determination, bodily autonomy, safety, and the decriminalisation of sex work is essential to ensuring their full human rights.

TGEU (Transgender Europe and Central Asia), along with the European Sex Workers' Rights Alliance (ESWA), has similarly emphasized the need to decriminalise sex work to protect trans lives. In a 2023 joint statement, we have pointed to the alarming data from the Trans Murder Monitoring project: 58% of trans people murdered worldwide are known to have been sex workers. This staggering figure speaks not only to the violence faced by trans individuals globally, but to the compounded risks that arise at the intersection of transphobia and whorephobia. TGEU and ESWA affirm that the criminalisation of sex work endangers trans people's lives and undermines their access to justice, housing, and

<sup>&</sup>lt;sup>1</sup> E.g. ILGA-Europe 'Empowering LGBTI sex workers towards the full respect of their human rights' (2018), TGEU, The vicious circle of violence: Trans and gender-diverse people, migration, and sex work (2017), UN Expert on Protection against violence and discrimination based on sexual orientation and gender identity (IE SOGI): A guide on the human rights of sex workers (2024), Council of Europe Human Rights Commissioner: Protecting the Human Rights of Sex Workers (2024)

healthcare. The statement urges European governments to uphold the dignity and autonomy of all sex workers, including trans women, through full decriminalisation and anti-discrimination measures.

The ongoing criminalisation, stigma, and economic exclusion that sex workers in particular LGBTIQ face—especially trans women, people of colour, and migrants—are often the very factors that push them toward sex work as a means of survival. Homophobic and transphobic family rejection, barriers to education and formal employment, and the heteronormative structures of many societies leave LGBTIQ individuals with few economic alternatives. For many, sex work becomes a livelihood strategy in the absence of other viable options, but one that is often criminalised and stigmatised, leaving individuals at heightened risk of violence, housing insecurity, and systemic abuse.

It is within this broader context that the need to address the intersection between LGBTIQ rights and sex workers' rights becomes urgent and unavoidable. Recognising the realities of LGBTIQ sex workers, affirming their agency, and ensuring their protection must be central to any comprehensive human rights and equality agenda in Europe. This includes integrating the voices and experiences of LGBTIQ sex workers into policymaking processes, ensuring access to justice and housing, and dismantling the intersecting structures of oppression that marginalise them. The European Union's LGBTIQ Equality Strategy provides a crucial platform from which to advance this intersectional approach, grounded in dignity, rights, and lived experience.

#### 3. Housing Discrimination at the Intersection of LGBTIQ Identity and Sex Work

According to the <u>Intersections: LGBTI II Survey – Homelessness Analysis</u> (ILGA-Europe & FEANTSA, 2023), housing insecurity and homelessness are urgent and under-recognized issues facing LGBTIQ people across Europe. Drawing on data from the EU Fundamental Rights Agency's LGBTI II Survey, the report reveals that one in five LGBTI individuals in the EU have experienced homelessness, a figure that rises to one in three among trans people and nearly 40% among intersex people. The research identifies multiple contributing factors, including family rejection, discrimination, poverty, and the lack of inclusive, supportive housing and shelter systems. These factors combine to push LGBTIQ individuals into precarious living situations, often without access to basic safety or privacy.

Building on these findings, the European Sex Workers' Rights Alliance (ESWA) offers additional insight in its 2025 ESWA report No Place to Call Home, explores the lived realities of sex workers and reveals how the forms of housing discrimination are compounded when intersecting with stigma against sex work. ESWA's research delves deeper into how structural discrimination against LGBTIQ people—especially trans and migrant individuals—not only leads to housing exclusion but also increases economic vulnerability. In many cases, this discrimination forces people into sex work as a survival strategy, due to the lack of secure housing and employment opportunities.

Crucially, ESWA documents how discrimination based on gender identity is not only a barrier to accessing housing, but also a pathway into sex work for many trans people. One of the interviewees, a trans woman, explains: "If I rent an Airbnb and they realise that I am transgender, they make the connection of me using the house to do sex work so they won't allow it." This illustrates how transphobia and whorephobia often overlap, with trans individuals automatically perceived as sex workers, regardless of whether or not they are

engaged in sex work. This assumption alone can be grounds for eviction or denial of accommodation. Legal models such as the Swedish model, which criminalise the purchase of sex and the profit made from prostitution, claim to protect sex workers, particularly the most vulnerable. However, these models have consistently failed migrant and LGBTIQ sex workers. The criminalisation of third parties (those who profit from the prostitution of others) can lead to state-sanctioned violence. Police often threaten landlords with prosecution under these laws, resulting in sex workers being evicted from their homes. Such laws significantly increase barriers, particularly for trans people, who are often associated with sex work, causing landlords to fear prosecution. Additionally, brothel-keeping laws affect sex workers themselves, as working and living together for safety reasons often leads to their prosecution for brothel-keeping, which can result in eviction and deportation.

ESWA's findings further show that even when trans people are engaged in sex work, their access to housing is undermined by systemic racism, xenophobia, and the informal nature of their employment. A Black trans woman and migrant in Italy, shared: "I have always had difficulties finding a house. I went to several real estate agencies, and the first problem was being trans. Second, being Black. Third, being a foreigner. Fourth, not having 'administrative security'—an employment contract." Without formal documentation of employment, trans sex workers are particularly vulnerable to exploitation by landlords. Another trans woman, added regarding excessive high rent: "We, as trans persons, do not have a contract, we do not have a paycheck from work...thus a landlord can easily profit from us... But I have no other choice. Without a paycheck or a steady job I cannot have a house paying less than this."

For those who turn to emergency shelters, the situation is often no better. Shelters are rarely designed to accommodate the specific needs of trans or gender-diverse individuals and may perpetuate discrimination under the guise of cultural or religious sensitivities. A Serbian trans woman described being evicted from a shelter in Italy after she began presenting publicly as a woman: "After five minutes they called me into the office... they told me: 'This is a centre where we host the people we help, but here, as you can see, there are many Muslims and we cannot accept a person like you because you are either a prostitute or a trans, or something of that sort. Isn't it?" This testimony not only reveals institutional transphobia, but also how perceptions of sex work—whether accurate or assumed—continue to justify exclusion from basic services.

There is a need for an intersectional approach in European housing and anti-discrimination policy. Together, they make clear that the discrimination LGBTIQ people face in housing is both a driver and a consequence of structural marginalization—and that for many, especially trans and migrant individuals, this is inseparable from their experiences with sex work. The EU LGBTIQ Equality Strategy must therefore address the full spectrum of this intersection: by ensuring that sex workers' rights are explicitly protected, by expanding access to inclusive shelter and housing systems, and by challenging the entwined stigmas of transphobia and whorephobia that continue to deny basic human rights to some of the most vulnerable members of our communities.

### 4. Access to Justice: Policing and Structural Barriers Faced by LGBTIQ Sex Workers

Another important report published by the European Sex Workers' Rights Alliance, Exposed From All Sides: The Role of Policing in Sex Workers' Access to Justice (2024), sheds light on the pervasive and systemic nature of police discrimination and violence experienced by sex workers across Europe. As part of the broader context of the EU LGBTIQ Equality Strategy, the report demonstrates how law enforcement often acts not as a source of protection but as a source of harm—particularly for LGBTIQ sex workers. Drawing on 199 interviews conducted across 11 European countries and within four legal models of sex work (criminalisation, partial criminalisation, the Swedish model, and regulation), the report shows that policing practices are shaped by intersecting factors, including gender identity, migration status, sexuality, and working arrangements.

The report explores whether current law enforcement practices help remove barriers to justice or, instead, contribute to miscarriages of justice. The findings show that sex workers often experience violence and abuse at the hands of police, and that these experiences are compounded for trans and queer individuals. Trans women, non-binary, and gender non-conforming people in particular face layered stigma and profiling, exposing them to disproportionate targeting and violations by law enforcement officials.

#### Transphobia

Discriminative treatment on the basis of gender expression and characteristics was experienced by all trans participants, who made up 29.1% of the overall sample size, with 58 identifying as trans, non-binary, or gender non-conforming. The greatest proportion of trans participants were trans women (46).

Forms of transphobia mentioned by participants included being insulted, mocked, or misgendered, or having their gender questioned; being treated as a social ill or threat to the public; experiencing overall worse police treatment than cis women as well as violence from the general public; being profiled as sex workers.

The forms of transphobia, and in particular transmisogyny, that were present in the data mirrors in many ways the stigma attached to sex work. Additionally, due to transmisogyny, trans women were, similarly to racialised women, particularly often profiled as sex workers and thus treated with disdain, even if they were not actively sex working at the time.

"Whenever I travel, almost in any country that you go to, border guards stop you. When they look at your papers, your passport, and you have a male name or the gender marker on your passport isn't aligned with your gender presentation, they treat you as someone who has come there to work. They treat you as a whore. [...] I said, 'So a trans woman can't go on holiday?' But that's the problem: transsexuals are always seen as sex workers." — Catalina, Netherlands

Data shows that trans sex workers were particularly vulnerable to police maltreatment and abuse. Rates of violent incidents with the police were consistently higher for transgender participants than for cisgender participants. Trans sex workers also experienced higher rates of discriminatory police treatment, with 87.2% of trans women and 58.3% of trans men, nonbinary, and gender non-conforming participants reporting such experiences.

Trans sex workers reported being treated as undeserving or unworthy and being ridiculed and dehumanised by police. Transphobic behaviours from police included insults, mocking, and misgendering.

"Whenever they see us on the street they call us men's names. They make fun of us and laugh at us." — Ángela, Spain

It was also reported that police sometimes go as far as outing trans sex workers to clients, insisting that they are 'tricking' them; this, in turn, is potentially inciting transphobic violence from clients or passers-by.

It was also not uncommon that stigmatisation and discriminatory treatment translated into violent police behaviours, with trans sex workers being beaten by officers during routine patrolling or ID checks.

"A police officer asked me for my documents, and when I gave them to him he said to me, 'You fucking faggot, shut up.' I said, 'In my documents, it doesn't say 'faggot'.' Then the officer hit me. That's when I told him, 'You don't have the right to hit me." — Lilith, Spain

Prevalent transphobia among police was one of the main underlying factors for participants not to report violence and seek help from police when violated. It was not uncommon for trans sex workers to feel dismissed when reporting harassment, violence, or abuse to the police, or being denied any support altogether.

#### Homophobia

Homophobia and general bigotry directed against LGBTIQ people were key reasons why participants avoided the police as much as possible, as Aris explained.

"What makes it difficult is that you're afraid of getting homophobia in the face, so you don't go out and report it. I think part of it is the homophobia itself and the patriarchal ideas that they have about it. Police will say, 'Come on... you're a man, you have to fend for yourself. Why are you crying like a woman?' I'm afraid I'll hear such words." — Aris, Greece

The link between homophobia and sexism are clearly evident here. 'Crying like a woman' is considered unacceptable for a man like Aris.

Being treated differently than 'ordinary citizens' leaves LGBTIQ sex workers more isolated and lacking protection from homo- or transphobic attacks. This extends to police officers.

"I have had encounters with police officers who were homophobic and a bit racist." — Cesibel, Spain

"The police in Poland – not all of them, but the majority – are quite ignorant and treat individuals in the LGBT community as subhuman, and I have experienced this myself. So, if a sex worker is also an LGBT person, their likelihood of being mistreated doubles." — Rena, Poland

The homophobia experienced by participants from police confirms findings of earlier reports (<u>ESWA</u>, 2020) and points towards a pervasive and systemic character of homophobia in police forces across Europe. This affects how LGBT sex workers are being

treated and policed on an everyday basis, and hampers their access to justice, exposing them to discrimination and mistreatment when they seek protection or assistance from police.

The Exposed From All Sides report highlights the violence and harms faced by sex workers in Europe as a result of policing, emphasising how law enforcement- as gatekeepers to justice- restricts their access to justice and legal protection. Abusive policing practices, deeply rooted in criminalisation and systemic prejudice, stem directly from discriminatory laws and biassed policing structures. This report calls for transformative justice as an alternative to current policing methods, aiming to address the underlying conditions of harm without relying on punitive measures. Sex workers' lack of access to justice occurs within a broader context of expanding police powers and an increased reliance on criminal law at the expense of social justice. Like other marginalised groups, sex workers fear retribution, harassment, and incrimination, which leads them to avoid seeking help from the police.

This research highlights the violent, corrupt, and discriminatory nature of policing. Efforts such as increasing police diversity, community policing, and ethics training have been shown to have limited impact because they fail to address the systemic stigma surrounding sex work, as well as racism, sexism, xenophobia, transphobia, and homophobia, all of which contribute to the mistreatment of sex worker communities in Europe.

Beyond full decriminalisation of sex work and the repeal of excessive police powers, a transformative justice approach to securing sex workers' access to justice requires reallocating funding from the police to non-carceral, community-led, and social justice-oriented services. Sex worker-led organisations are pivotal in shaping policies and supporting their communities. They also play a crucial role in improving sex workers' access to justice and equality before the law.

# 5. Access to Healthcare: Navigating Stigma at the Intersection of Sex Work and LGBTIQ Identity

Healthcare remains a critical frontier where the overlapping identities of being a sex worker and LGBTIQ intensify barriers to accessing safe and respectful care. ESWA's report <u>Two Pairs of Gloves</u>: Sex Workers' Experiences of Stigma and Discrimination in Healthcare Settings in Europe (2023) investigates these barriers, revealing stigma as a central obstacle. When sex workers disclose their occupation, they frequently face denial of care, disrespectful or abusive language, breaches of confidentiality, and substandard treatment quality. Such experiences erode trust in healthcare systems and deter individuals from seeking future care.

"Preconceived notions that people have about us, that we're unreasonable, irresponsible, as if we were putting ourselves in danger or mutilating ourselves by our choice of work, that it's the hidden cause of our "somatic" health problems, that we're alienated, that we're accomplices in the exploitation of women, that we need to be saved." Bisexual, disabled, migrant, sex worker, France

Sex workers' experiences of stigma and discrimination in healthcare settings are deeply shaped by intersecting systems of oppression, including ableism, classism, racism, cis-

sexism, homophobia, transphobia, fatphobia, and xenophobia. For LGBTIQ sex workers, these overlapping oppressions compound barriers to accessing quality care. As one respondent articulated:

"Understand we aren't just marginalised for doing sex work, we were already marginalised before and that's why we are doing sex work." — Queer, non-binary, disabled, sex worker, U.K.

Fear of discrimination often leads to strategic concealment of both sex work and other minoritised identities in healthcare settings. Many participants expressed distrust toward providers and anticipated that disclosure would lead to judgment or inadequate care:

"I don't bother telling health services I'm non-binary because I don't think they'll respect it." — Queer, non-binary, disabled, sex worker, U.K.

Quantitative data from the study supports these concerns: 38% of lesbian, gay, bisexual, and queer sex workers chose to hide their sexual orientation in healthcare environments, while 30% of trans, non-binary, and intersex sex workers concealed their gender identity or sex characteristics. For many, disclosure becomes a calculated decision, often choosing to reveal one aspect of their identity while hiding another.

This kind of strategic non-disclosure was often aimed at minimising anticipated stigma and harm, particularly in contexts where multiple identities are simultaneously stigmatised:

"In my country in general being LGBTQIA+ brings shame, so being a sex worker too, is a big shame combo." — Queer, non-binary, disabled, sex worker, Poland.

The compounding effects of stigma meant that some LGBTIQ sex workers reported being denied care not for their work, but due to their sexuality—because they chose not to disclose being a sex worker in hopes of avoiding further discrimination:

"They refused to run certain tests because I'm a lesbian, and hadn't outed myself as a sexworker." — Non-binary, lesbian, migrant, sex worker, France.

Trans and non-binary sex workers, in particular, faced a unique set of challenges when seeking healthcare. Their treatment often depended on their perceived ability to "pass" according to gender norms. Those whose gender expression visibly diverged from societal expectations reported greater exposure to discrimination: "These [humiliating comments] mostly happened when I dressed as a woman." — Trans woman, migrant, sex worker, France.

A common source of distress was the mismatch between legal gender markers on identity documents and individuals' gender identity or presentation. This mismatch frequently led to deadnaming, including in public settings such as waiting rooms, which participants described as deliberate and humiliating.

Moreover, trans and non-binary sex workers reported being subjected to invasive, unnecessary, and fetishising questions:

"Questions like how I masturbate, how often etc, which were not needed for the diagnosis." — Queer, trans-masc, disabled, sex worker, Poland.

Access to gender-affirming care was often contingent on compliance with healthcare providers' gatekeeping behaviours. Trans and non-binary participants expressed feeling pressured to answer intrusive questions or tolerate inappropriate behaviour in order to access essential services like hormone replacement therapy.

Building on these insights, ESWA's <u>UnPrEPared report</u> (2025) examines how sex workers—especially those who are LGBTIQ—face exclusion from PrEP (pre-exposure prophylaxis) programs, HIV prevention, and broader health services. The report emphasises that criminalisation, stigma, and systemic invisibility compound health vulnerabilities. When profession or identity are criminalised, access to critical prevention and treatment services dwindles—overlooked in broader public health responses.

Sex workers are recognized as a key population in the HIV field. Legal barriers, stigma, and violence contribute to their vulnerability - even more so for trans and gender diverse sex workers, who face overlapping discriminations. The result is a higher HIV risk, and not much reliable data: oppressive structures drive sex workers underground, away from medical facilities.

To further advance the intersectional agenda, ESWA toolkit Implementing Inclusive Programming for Trans and Gender Diverse Sex Workers (ESWA, 2024) lays out how health services can embrace trans and gender diverse needs. The importance of community for individual and collective empowerment is reaffirmed throughout the leading data and guidance that underpin global health policy. The centrality of community empowerment and leadership to human rights responses, including effective and human rights based HIV and STI programming with and for trans and gender diverse sex workers, is the guiding principle of this toolkit, which is intended as a resource for sex working and queer communities and their allies, and can be used as an advocacy tool with policymakers, funders, and healthcare providers. The toolkit weaves together leading international HIV guidance with current data and community resources and sets forth the key elements and considerations of effective HIV programming developed and delivered with and for trans and gender diverse sex workers. Trans and gender diverse sex workers are experts in their lives and should be engaged at all stages of the governance, planning, delivery and evaluation of health programming, which should comprehensively address their diverse needs throughout their life course.

Together, ESWA's research reveals how stigma and discrimination in healthcare are not limited to professional bias—they are systemic. The ESWAs' reports carry deeper meaning for LGBTIQ sex workers, who face multiple layers of exclusion: as sex workers, as queer or trans individuals, and often as migrants or racialised people. These barriers manifest not only in clinical spaces but also in public health policy, reinforcing cycles of invisibility, poor health outcomes, and distrust in the health system.

For the EU LGBTIQ Equality Strategy, these findings make it clear that addressing health inequalities for LGBTIQ sex workers—particularly trans and gender diverse individuals—requires more than clinical service provision. It demands systemic change rooted in meaningful inclusion. Trans and gender diverse sex workers must be recognised not merely as recipients of care but as experts in their own lives and needs. Their meaningful participation in the design, governance, delivery, and evaluation of health programming is essential to ensuring that services are appropriate, respectful, and effective. As outlined in ESWA's guidance, community empowerment and leadership are central to rights-based

responses, especially in HIV and STI programming. Inclusive, well-funded, and community-led health interventions must comprehensively address the realities LGBTIQ sex workers face across their life course. For the EU LGBTIQ Equality Strategy to be truly effective, it must centre the lived experiences of LGBTIQ sex workers and ensure their full inclusion in all relevant policy processes.

The current advances of reactionary discourses coming from the USA and the UK specially, where any gender affirming care, not only for minors, but for everyone is getting extended beyond those countries borders and are starting to permeate to EU Member States, this situation produces a de-facto erasure of trans people, women in particular, from public life.

# 6. LGBTIQ Sex Workers and Digital Rights: Addressing Censorship, Exclusion, and Platform Accountability

While the Digital Services Act (DSA) has introduced mechanisms to increase transparency and accountability in online platforms, LGBTIQ sex workers continue to face systemic exclusion, censorship, and discrimination in digital spaces. This digital marginalisation severely affects fundamental rights including freedom of expression, freedom of assembly, access to information, access to livelihood, and safety online.

Sex workers—particularly those who are trans, non-binary, migrant, racialised, or otherwise marginalised—are disproportionately targeted by platform content moderation policies, surveillance technologies, and algorithmic bias. The removal or suppression of content created by LGBTIQ sex workers often occurs without due process, with no meaningful transparency or appeal mechanisms. These discriminatory practices echo broader patterns of offline exclusion, further entrenching social and economic inequality.

In "Sex Workers Belong on Social Media: Recommendations for Platform Accountability" (ESWA, 2025), ESWA highlights the urgent need for rights-based, community-informed approaches to platform governance:

Sex workers' experiences demonstrate that technical fixes alone (such as algorithmic tweaks or anti-bias training) are insufficient without deeper structural change. Any reform must take into account the technical, legal, political and social dimensions of platform accountability, and must involve sex workers themselves as stakeholders in the creation and oversight of these measures.

In ESWA's earlier report "The Impact of Online Censorship and Digital Discrimination on Sex Workers" (ESWA, 2022), LGBTIQ sex workers reported that deplatforming, shadowbanning, and targeted content suppression impacted their mental health, social support networks, visibility, and income generation. Particularly affected were those using digital tools for safety alerts, political organising, or health promotion.

These issues are not incidental—they reflect a broader systemic bias embedded in the content moderation practices and risk-averse compliance frameworks of major tech platforms. Despite the DSA's principles of transparency and accountability, its implementation must go further in protecting marginalised voices, especially those already targeted by intersecting forms of oppression.

#### 7. Key Recommendations for the EU LGBTIQ Equality Strategy

Recognise the Intersection of LGBTIQ Rights and Sex Workers' Rights
The EU must explicitly acknowledge that many LGBTIQ individuals—especially
trans, non-binary, and racialised people—engage in sex work due to structural
inequalities. Their lived realities are shaped by intersecting forms of discrimination
including homophobia, transphobia, xenophobia, and anti-sex worker stigma.
These must be addressed holistically in all relevant policy areas.

### 2. Invest in Community-Led Solutions and Fund LGBTIQ and Sex Worker-Led Interventions

Community empowerment is central to ensuring the effectiveness of human rights responses. Trans and gender diverse sex workers, in particular, should be supported as experts in their own lives and should be involved in all levels of decision-making—from governance and planning to implementation and evaluation. Targeted funding mechanisms must be created to support LGBTIQ and sex worker-led organisations.

- 3. Ensure Full Inclusion of LGBTIQ Sex Workers in Policy-Making The voices of LGBTIQ sex workers must be meaningfully included in the development, monitoring, and revision of EU and national policies. This includes legal, social, health, and justice frameworks. Mechanisms for structured consultation should be established to ensure their experiences shape policy.
- 4. Integrate LGBTIQ and sex workers Specific Needs in the Implementation of Gender-Based Violence Legislation

During the transposition and implementation phases of the *Directive on Combating Violence Against Women and Domestic Violence* and the *revised Victims' Rights Directive*, it is vital to address the specific vulnerabilities of LBTIQ and sex workers—particularly sex workers, trans people, and LBTI women.

### 5. Provide Dedicated and Sustainable Funding for Community-Based and Non-Carceral Justice Solutions

The EU should reallocate funding from punitive policing towards community-based, non-carceral solutions that promote safety and justice for sex workers and LGBTIQ people. This includes peer-led legal support, housing, healthcare, and anti-violence services.

- 6. Recognise Sex Worker Rights Defenders as Human Rights Defenders Activists and community organisations advocating for sex workers' rights—many of whom are LGBTIQ individuals—must be officially recognised and protected as human rights defenders. EU policies should ensure they are included in civil society dialogues and protected from reprisals.
- 7. Ensure Inclusive Access to Healthcare and Address Discrimination in Health Systems

EU public health policies must explicitly tackle the multiple forms of stigma LGBTIQ sex workers face in accessing healthcare. This includes:

- o Combatting transphobia, homophobia, and anti-sex worker stigma in healthcare systems.
- o Supporting gender-affirming, trauma-informed, and non-discriminatory services.
- Funding research and services that reflect the lived realities of LGBTIQ sex workers, including in the areas of HIV, STI prevention, reproductive health, and mental health.
- 8. Incorporate Housing Security into LGBTIQ and Social Inclusion Agendas Housing insecurity—particularly among trans, migrant, and racialised sex workers—must be addressed in the EU's housing strategies. Policies should promote non-discriminatory housing access and fund emergency and long-term housing solutions tailored to LGBTIQ sex workers.
- 9. The EU LGBTIQ Strategy should address Censorship, Exclusion, and Platform Accountability. The EU LGBTIQ Equality Strategy should recognise the disproportionate impact of online censorship, deplatforming, and algorithmic discrimination on LGBTIQ sex workers. In the implementation of the Digital Services Act and related digital policies, the European Commission should promote inclusive, rights-based platform governance that addresses the specific vulnerabilities of marginalised LGBTIQ communities. This includes supporting meaningful participation of LGBTIQ-led and sex worker-led organisations in digital policy processes, and encouraging Member States and platforms to prevent discriminatory content moderation and ensure transparent, accessible redress mechanisms.