

Civil Society Strategy 2026-2030

European Sex Workers' Rights Alliance (ESWA) contribution to advance the EU CSO Strategy beyond 2025

Submission to the EU Civil Society Strategy on behalf of the European Sex Workers' Rights Alliance (ESWA)

The European Sex Workers' Rights Alliance (ESWA) is a sex worker-led network that proudly represents over 111 organisations across 30 countries in Europe and Central Asia. Out of these, more than 60 are sex worker/community-led, with 47 located in EU member states. ESWA's core aim is to ensure that all sex worker voices are heard, and that their human, health, and labour rights are recognised and protected. The ESWA board and the majority of its staff are sex workers from diverse backgrounds and experiences.

Sex work is a multi-gendered phenomenon, involving individuals of all genders and sexual orientations. Sex workers are a community deeply impacted by social and economic exclusion, often working in a highly criminalised sector, and frequently comprising (undocumented) migrants, LGBTQI+ individuals (particularly trans persons), racialised individuals, single-parents, and people with disabilities. Cisgender women form the majority of sex workers globally and in Europe, often entering sex work due to economic necessity, flexibility, or as one of few viable income options due to structural inequalities and discrimination in mainstream labour markets.

This submission focuses on critical barriers to political participation and equal representation faced by sex workers, both offline and online, and proposes recommendations for the EU Civil Society Strategy to ensure their meaningful inclusion and protection.

1. Political Participation and Equal Representation

Sex workers across Europe encounter profound barriers to political participation and representation, stemming from deeply entrenched stigma, legal discrimination, and escalating political hostility. These challenges are exacerbated by various factors, including the influence of far-right ideologies, trans-exclusionary

Contact

Irena Feríčková Konečná, Senior Policy Officer · irena@eswalliance.org

feminist narratives, and growing anti-gender movements, which often portray sex workers as a threat to traditional values or as helpless victims in need of rescue, thereby excluding them from meaningful societal and political engagement. The European Parliamentary Forum for Sexual and Reproductive Rights' "Next Wave Report" (2025) warns of the coordinated rise of ultra-conservative actors across Europe, whose campaigns target sexual and reproductive rights, LGBTIQ+ communities, and feminists. Though less often acknowledged, sex workers are also seen as part of this ideological "crusade", portrayed as a threat to traditional family values and exploited as symbolic targets in moral panic campaigns.

Key Barriers to Political Participation:

Ideological Narratives Legitimising Exclusion:

The regressive approach has been also legitimised recently by the UN Special Rapporteur on violence against women and girls. Her recent report controversially adopted a "sex-based" framing of violence, which undermines decades of intersectional, inclusive feminist advocacy and erases the realities of trans and sex working communities ([Joint Statement, 2025](#)). The mandate holder is also known as trans-exclusionary radical feminist and by her reports and interventions legitimises an exclusion of trans people. And lastly, the current mandate holder is also sex workers exclusionary feminist, conflating all sex work with violence against women and denying the voices of the communities. Such positions align, whether intentionally or not, with the positions of anti-rights actors like the European Centre for Law and Justice (ECLJ), whose 2025 report "*Prostitution: A New Right for Women?*" rejects the legitimacy of sex workers' voices, rights, and identities and dehumanises sex workers right defenders ([ECLJ, 2025](#)). Rather than recognising sex workers as rights-holders, such narratives cast them as either threats to the social order or helpless victims needing rescue—excluding them from meaningful participation.

Gender-critical feminists, who frequently oppose the recognition of trans rights, often align with ultra-conservative organisations in their anti-sex work stance. This unlikely alliance reinforces the institutional ambiguity around sex workers' rights, deepening discrimination in EU institutions, national policies, and civil society spaces. Similarly, another legitimisation of sex workers from political participation, which specifically targets sex workers can be also observed in the EU institutional texts. The European Parliament's 2023 resolution on 'Cross-border implications and impact on gender equality and women's rights' discredits sex workers' voices by stating that those who refer to themselves as "sex worker" represent only a minority of people in prostitution, despite being "well organised and publicly visible". ESWA counters this by highlighting its representation of 111 organisations, with an estimated reach of 100,000 to 150,000 people annually across Europe.

Contact

Irena Feríčková Konečná, Senior Policy Officer · irena@eswalliance.org

ESWA argues that using such logic would delegitimise trade unions, which also represent only a percentage of the total workers.

Decisions about sex work laws, policies, and interventions (such as HIV programming) are often made on behalf of sex workers or behind their backs, discrediting them as potential partners in social debates.

Institutional Discrimination and Silencing:

The ideological ambiguity that legitimises the exclusion of certain groups from political participation is also reproduced within institutional practices, including EU funding procedures. Although the EU is committed to supporting civil society organisations through its programmes, the evaluation process remains vulnerable to bias. Reliance on external experts, whose personal positions may influence assessments, risks disadvantaging certain groups of applicants. In the large volume of applications, such bias can be overlooked rather than corrected.

An evaluation report obtained by ESWA contains discriminatory remarks that are both unacceptable and incompatible with the EU's commitment to equality and fundamental rights. This demonstrates the urgent need for stronger safeguards and stricter oversight in the evaluation process to guarantee fairness, inclusivity, and equal treatment of all applicants.

In 2021, ESWA received an evaluation report for its CERV Operating Grant application (proposal number 101051251), which informed us of the proposal's rejection. The basis for this rejection is deeply concerning and included statements such as: ***“The main risk remains that of including sex workers in the project activities and their inclusion in policy making.”*** This rationale starkly contradicts the core principles of the CERV programme, which are rooted in non-discrimination, inclusion, and support for civil society.

The case illustrates not only how sex workers are systematically marginalised and denied recognition as human rights defenders but also points to the bottlenecks of the existing CERV evaluation system, which falls short to prevent biases of such kind.

Denial of Self-Organisation and Advocacy:

Beyond challenges in accessing fair and unbiased funding, sex workers' organisations and advocates across Europe face systemic barriers to exercising their fundamental rights to self-organisation, advocacy, and participation in democratic life. These barriers take the form of institutional discrediting, exclusion from policymaking processes, denial of union rights, refusal of emergency support, and even legal intimidation. Such practices not only undermine the EU's commitments to democracy, equality, and fundamental rights but also actively

Contact

Irena Feríčková Konečná, Senior Policy Officer · irena@eswalliance.org

silence some of the most marginalised voices in Europe. The following country examples illustrate how these patterns of exclusion manifest in practice.

- In **Sweden**, sex workers seeking to oppose the dominant narrative (that they are victims of male oppression) are discredited and infantilised, with state institutions depicting them as "self-destructive or self-deceiving". **Red Umbrella Sweden**, a sex worker-led organisation, was ignored by governmental agencies and politicians regarding legal changes, with one member receiving an email that completely dismissed their lived experience. Red Umbrella Sweden members are also **barred from hanging flyers at health centres** that provide services to sex workers, due to their advocacy for sex workers' rights and decriminalisation, which goes against the state's anti-sex work view.
- A member of Red Umbrella Sweden experienced being **publicly identified by police during a raid**, despite not being a criminal, leading to their name, pictures, and address being published. This resulted in them being **fired from their regular job**, making them dependent on sex work, in what was perceived as an attempt to "shame" them out of the industry.
- In **Spain**, the first 100% independent union led by sex workers, OTRAS, had its union status initially annulled by the Labor Ministry in 2018, with the Labour Minister conflating consensual sex work with trafficking. Although the Supreme Court of Spain later **recognised the right of sex workers to form unions in 2021**.
- In **France**, during the COVID-19 pandemic, the government **refused emergency funding to sex workers**, citing fears of "pimping" or that funds would be recovered by traffickers, despite sex work being recognised as legal work by URSSAF and tax authorities. This narrative of "prostitution as violence against women" actively blocks meaningful consultation and funding for sex worker organisations, despite their crucial role in defending marginalised groups.
- In **Germany**, a sex worker human rights defender faced a Strategic Lawsuit Against Public Participation (**SLAPP**) case, demonstrating how legal systems can be misused to silence activists.

Such deliberate exclusion from democratic participation, denial of the right to unionise, silencing through litigation, and punishment for visibility create a hostile environment where advocacy is penalised, making it difficult for sex workers to disclose their occupation, self-organise, and advocate for their rights.

Recommendations for Political Participation:

The EU Civil Society Strategy must adopt a transformative justice approach that centres the voices and needs of affected communities. To address these profound barriers, ESWA proposes the following:

- **Recognise Sex Worker Human Rights Defenders (HRDs):** Explicitly recognise sex workers, particularly those leading advocacy and organising

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efforts, as Women's Rights and Human Rights Defenders within EU policies and funding frameworks. This includes their full inclusion in civil society consultations, equal access to EU programmes (such as CERV), and protection from institutional discrimination and retaliation, aligning with Front Line Defenders (2021) standards and the EU Guidelines on HRDs.

- **Establish Safeguards in EU Funding Evaluations:** Implement robust safeguards within the European Commission to ensure that funding evaluation processes, especially for programmes like CERV, are free from bias and discrimination. This should involve:
 - Adopting clear, rights-based evaluation criteria aligned with the EU Charter of Fundamental Rights and anti-discrimination principles.
 - Ensuring the **diversity and impartiality of evaluation panels**, particularly in areas affected by polarising socio-political debates (e.g., sex workers' rights, trans rights).
 - Introducing transparency and accountability mechanisms for rejections based on the inclusion of stigmatised or marginalised groups.
 - Recognising that marginalised communities should **never be treated as "risks"** to participation or policy-making.
- **Promote Meaningful Engagement:** The European Commission should elaborate on the meaning of "*meaningful engagement*" of communities in policy-making, consistent with definitions from organisations like the World Health Organisation, which emphasise respectful, dignified, and equitable inclusion of individuals with lived experience, valuing their expertise, and transferring power to them. (See also 3023 FRA Civic Space Report)
- **Support Civil Society Monitoring:** the strategy should support the establishment of a civil society-led, bottom-up monitoring system for civic space. This system should be funded in the long term to identify systemic issues and European trends, especially those concerning vulnerable groups, societal polarisation, and the influence of disinformation and traditional and extremist narratives that question democratic principles. The monitoring body should also include and cooperate with organisations that monitor attacks on civil society. This monitoring should inform preventative and reactive follow-up action at EU level, including public statements and the use of legal instruments.
- **Boosting EU-level funding for civil society organisations (CSOs) in countries where the rule of law is at risk** and/or where the EU has launched infringement proceedings. When the EU imposes funding cuts on member states for breaching EU law and undermining the rule of law, civil society organisations may be

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unintentionally affected. Yet CSOs play a vital and irreplaceable role in defending democracy and upholding the rule of law. To ensure their sustainability and effectiveness, the EU should make dedicated funding available—through programmes such as CERV and others—in countries where the rule of law is under threat.

2. Online Political Participation and Digital Discrimination

The internet has become a vital arena for advocacy and organising, especially for communities historically excluded from traditional policymaking spaces. However, for sex workers, particularly racialised, trans, or migrant individuals, online platforms are increasingly hostile and exclusionary.

Key Barriers to Online Political Participation:

- **Algorithmic Discrimination and Content Moderation:** Sex workers and sex worker-led organisations are disproportionately targeted by algorithmic discrimination and content moderation systems. These systems often treat any mention of sex work as inherently harmful, exploitative, or violative of platform policies, even when shared for harm reduction, advocacy, or labour rights. Recently a Study on the Censorship of the womens' sexual and reproductive health and rights is also illuminating in a way how algorithmic discrimination extends to various areas of women's rights. Again, as highlighted in the previous chapter, such discrimination must be seen in the context of the political climate, growing far-rights and conservative sentiment. Lastly and importantly, the algorithmic discrimination was also very apparent and visible in the issue concerning Gaza and Palestine.
- **Digital Exclusion and Suppression of Rights:** ESWA's 2022 report, "The Impact of Online Censorship and Digital Discrimination on Sex Workers," documents how platform censorship prevents sex workers from exercising fundamental rights, including:
 - **Freedom of expression**, to speak about experiences and challenge harmful stereotypes.
 - **Freedom of assembly**, to organise community actions and campaigns.
 - **Right to access information**, especially on health, safety, and legal rights.
 - **Freedom of association and unionisation**, impacting the visibility and ability of sex worker-led organisations to advocate.
- **Biased Systems:** ESWA's 2025 report, "Sex Workers Belong On Social Media," highlights that automated systems routinely flag and suppress posts by sex workers or allies, often without human review or appeal.

Contact

Irena Feríčková Konečná, Senior Policy Officer · irena@eswalliance.org

Racialised and gender-diverse sex workers are particularly targeted, as their bodies and expressions are more likely to be misclassified under opaque, biased moderation criteria. **"These algorithmic systems are not neutral—they reproduce the very biases that marginalise sex workers offline,"**

Case Study: The Suspension of ESWA's Instagram Account

One clear example of this systemic discrimination occurred on **1 June 2025**, just **one day before ESWA's biggest coordinated action** commemorating the 50th anniversary of **International Sex Workers' Rights Day**.

To honour the historic church occupation in Lyon on 2 June 1975—where sex workers protested police violence and demanded dignity and labour rights—ESWA coordinated a Europe-wide mobilisation. Sex worker-led groups across 30 countries organised symbolic reclaiming of public and religious spaces, live-streamed events, and released advocacy materials across social media.

Yet on the eve of the action, **ESWA's main Instagram account—with over 10,000 followers—was suddenly suspended without warning or explanation**. All prepared content, live streams, and outreach were rendered invisible. Member organisations reported similar experiences, suggesting a **coordinated mass-reporting campaign likely exploited platform moderation systems** to silence the mobilisation.

This action amounted to a **digital erasure of sex workers' political agency** and a violation of their fundamental rights. It blocked:

- **Collective expression** on a globally recognised day of protest;
- **Public education and visibility**, including awareness campaigns and harm reduction information;
- **Democratic participation**, by excluding sex workers from online spaces where civil society increasingly operates.

By silencing the voices of over 120 sex worker-led organisations across 30 countries, this takedown demonstrates the precarity of online organising for stigmatised communities—and the need for structural accountability. These acts are not isolated incidents, but part of a broader trend in which sex worker voices, but also sexual and reproductive health and rights content are algorithmically excluded from the digital public sphere.

Recommendations for Online Political Participation:

To combat these forms of digital discrimination and ensure equitable online participation, ESWA proposes:

Contact

Irena Feríčková Konečná, Senior Policy Officer · irena@eswalliance.org

- **Addressing Algorithmic discrimination of CSOs and their content:** The new CSO Strategy should, among others, address the algorithmic discrimination. In particular the EC should pro-actively strengthen enforcement of the DSA to prevent algorithmic discrimination against marginalised groups, including sex workers, trans people, and racialised communities. Content moderation systems must be transparent, accountable, and subject to human rights impact assessments. Independent oversight mechanisms are crucial to ensure that content moderation practices do not disproportionately silence advocacy, unionisation, and public health communication by stigmatised groups.
- **Addressing Digital Attacks:** the Civil Society Strategy should acknowledge increasing attacks in the online space and explore how mechanisms under the Digital Services Act could address these. Digital support should be a flexible component of protection mechanisms for CSOs and human rights defenders.