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Shape-shifting and Strategic In/visibility: Comparing Sex Work Activism in Singapore and the Philippines

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Abstract

Research on public health, crime, and policing regularly discusses sex workers in Southeast Asia but rarely recognises them as agents of social and political activism. This paper shows that sex workers and their allies in Singapore and the Philippines have long and rich histories of challenging their criminalisation and stigmatisation through cultural activism, political advocacy, consciousness-raising, and the provision of direct services to fellow sex workers. Using feminist ethnography, including interviews and participant observation with Project X in Singapore and the Philippine Sex Workers Collective, this paper explores how sex work activists have strategically adapted to their political environments. In Singapore, they maintain resistance through 'shape-shifting,' working within state-sanctioned mechanisms, positioning themselves as public health service providers, and creating spaces for radical political advocacy. In the Philippines, where an anti-sex work position is more deeply entrenched within dominant social blocs, sex work activists aggressively criticise state policies on social media and in carefully vetted forums but remain strategically invisible to avoid exposure, harassment, misrepresentation, and prosecution. This paper looks at how sex work activists engage in claims-making — underscoring the differences in the political resonance of human rights in both countries — and interrogates how sex work activism challenges social hierarchies, especially concerning migrants and trans individuals. Overall, it contributes to a richer understanding of non-traditional forms of political activism in Southeast Asia and makes visible sex workers' contributions to feminism and labour movements in the global south and non-Western contexts.

Keywords: sex work; trafficking; activism; social movements; Singapore; Philippines

Introduction

In 2013, Women Hookers Organizing for their Rights and Empowerment (WHORE), an organisation of sex workers in the Philippines based in Baguio City, launched a PhotoVoice Competition themed "Zero Voice. Zero Stigma" (WHORE 2013a). The competition aimed to raise awareness about the impacts of stigma on Filipino sex workers' lives and was part of a broader campaign that WHORE envisioned to fully decriminalise sex work in the Philippines. The backlash was swift and aggressive: women's rights groups and the Catholic Church condemned the move and categorically declared that prostitution should never be understood as work because "women in prostitution" are victims of third parties and clients exploiting their poverty (Dumlao 2013; Quitasol 2013). WHORE had to cancel the competition and withdraw from public spaces, except for social media. One year earlier, in Singapore, Project X, a local nongovernmental organisation (NGO) that advocates for sex workers' rights and provides direct services to street-based sex workers, held an eight-day exhibition that featured recorded interviews with sex workers titled Unheard Voices of the Red-Light District. The exhibition, funded by an independent donor, drew 150 people on the opening night and another 150 attendees afterwards (Project X 2012: 2). In 2012, Project X also received invitations to a civil society roundtable on trafficking and to speak at various events at Singapore's top university, the National University of Singapore (Project X 2012: 2-3).

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Formed in 2008, Project X is a legally registered organisation in Singapore. Their vision is a fair and safe sex industry and a society that respects sex workers and their clients, partners, and families. The organisation's leadership team and Board of Directors comprises sex workers and non-sex workers whose names appear on their website. Their websites and social media accounts contain annual reports and extensive, up-to-date information on their projects and research. Media reports on sex work and related issues in Singapore regularly cite Project X, and the Singaporean government recognises their members as legitimate spokespersons for issues related to sex work.

In contrast, WHORE, the first sex worker-led organisation in the Philippines, was founded in 1989. After facing a huge backlash for their public statements, they retreated from public interaction to focus on expanding their base. WHORE formed the Philippine Sex Workers Collective (hereinafter "the Collective") in 2013. The Collective comprises male sex workers (Red Nobles), trans sex workers (Shawuskha), female student sex workers (Deviant Daughters), and male student sex workers (Deviant Dudes) (WHORE 2013b). The Collective is not legally registered and has not been invited to government consultations despite its active social media presence. All leaders and members are publicly anonymous because the Philippines criminalises sex work, and they risk arrest if exposed. The organisation communicates primarily through their Twitter and Facebook accounts and occasionally grants interviews with journalists and researchers. Some individual members advocate for rights for sex workers, transwomen, and HIV+ individuals on personal platforms without explicitly revealing their membership in the Collective.

At first glance, it is puzzling that sex worker rights activists in the Philippines have faced greater barriers in mobilising resources and engaging in political advocacy than their counterparts in Singapore. The Philippines is home to the largest number and range of civil society organisations (CSOs) in Southeast Asia and has fewer constraints on activism than its neighbours (Rodan 2013: 23; Weiss 2017: 383), while Singapore is regularly described as "quasi-authoritarian" (Luger 2016: 191; Rodan 2013: 30).

Drawing on McCammon's (2012: 18) conceptualisation of "strategic adaptation," this paper emphasises how sex worker rights activists engage in "proactive, self-conscious decision-making and tactical revision." This focus involves looking at how they perceive and interpret political opportunities and constraints in their institutional environments, determine and implement their tactics based on these assessments, and adapt and change tactics based on feedback and initial outcomes (McCammon 2012: 19). Political opportunities open up a group's access to power. They can result from shifts in political alignments, cleavages among the elites, the emergence of influential allies, and the availability of resources for mobilisation (Tarrow 1994: 164-165). On the other hand, threats or repression increase the costs of activism (Tilly 1978: 55). This paper considers organisations' attempts to **create** political opportunities in addition to responding to existing ones (Khagram *et al.* 2002: 17).

By examining how Project X and the Collective engage in claims-making and position themselves in relation to state actors, funders, and such relevant activists as women's and anti-trafficking organisations, this paper makes sense of the different progress sex worker activists achieved in both countries. Sex workers are a subaltern group even in the broader world of political activists because the dominant approach of women's movements in Asia has been to reject prostitution (Roces 2010a: 8). Therefore, the tactics and strategies of sex work activists also challenge and enrich the existing conceptual frameworks for understanding activism in Southeast Asia. Finally, by making visible the work of sex work activists, this paper provides a partial account of their contributions to broader social movements that advocate for rights for women, LGBT individuals, workers, and people with HIV.

Theorising Sex Work Activism in Singapore and the Philippines

Increasingly, scholars recognise that theory-building about Southeast Asian activism requires attentiveness to the region's various historical experiences and regime types (Ford 2013: 2). These variances may shape activists' political opportunities differently than in Western models and require alternative forms of strategic adaptation, especially for criminalised and stigmatised populations.

First, there are no clear boundaries between civil society and the state in Southeast Asia because the state regularly incorporates activists. For example, Singapore systematically manages political dissent through "administrative and societal incorporation." At the same time, many CSOs and NGOs in the

Philippines are involved in non-adversarial partnerships with government agencies or multilateral aid agencies (Rodan 2013: 30-34). Moreover, social activism in Southeast Asia, especially post-Cold War, is generally middle-class led, usually through CSOs (Rodan 2013: 23). CSOs have generally not sought fundamental and structural transformations of the political order and instead focused on technical questions around good governance (Rodan 2013: 24). In this paper, I show how Project X has leveraged opportunities for engagement and collaboration between the Singapore government and civil society. I also reveal how, in contrast, the Collective has been shut out of this process in the Philippines, even though better-organised and legally registered anti-sex work women's, children's, and migrants' rights groups have gained control of these opportunities. The Collective's response to criminalisation and stigmatisation has been to engage in "strategic invisibility" (Lollar 2015). This strategy involves challenging public policies on social media but keeping individual leaders and members anonymous to avoid exposure, harassment, and prosecution. Moreover, the group refuses to engage with journalists and researchers, except for a select few, to avoid the misrepresentation and distortion of their messages. This paper explores how the Collective's experience points to conceptual and political possibilities of invisibility as an activist tactic.

Second, the political acceptability of rights claims, especially sexual rights, diverge. Singapore lacks cultural resonance for civil-political rights, particularly sexual rights (Chua 2012: 713). There are strict legal restrictions on public speech and political organising, and Singapore's limited physical space (approximately 214 square miles) facilitates high levels of state control over the use and occupation of urban spaces (Luger 2016: 188). Thus, activists mobilising in Singapore generally avoid public, overt, and large-scale strategies such as public protests, the actions that scholarship on activism usually highlight (Chua 2012). In line with the scholarly focus on more subtle forms of mobilisation (Chua 2012) and the "quiet politics" (Jung 2022) that LGBT/queer groups wield in Singapore to push for social change, I track how Project X's 'institutionalisation' into a nonprofit that engages in service provision has allowed them to raise funds and appeal to the Singaporean government without undermining its authority, appealing to its managerial rather than moralistic approach to sex (Teng 2010). I reflect on whether 'institutionalisation' necessarily precludes resistance and draw on Majic's (2014: 24) concept of 'resistance maintenance' to show that Project X has retained their oppositional consciousness while adopting institutionalisation to secure their political survival and widen their space for transformative advocacy.

In comparison, human rights are a prominent component of the political grammar of activism in the Philippines (Claudio 2017). Filipino feminists are instrumental in shaping international women's rights instruments, and they occupy a central role in transnational feminist advocacy, particularly on trafficking and feminised labour migration (Roces 2010b: 47-48). However, this paper complicates our assumptions about the promise of transnational activism in the name of human rights by showing that while mainstream Filipino feminist movements' strong transnational links and government partnerships have contributed to robust women's rights legislation on many issues, it has had a disabling effect on sex work activism.

Third, the dynamics of development funding in Southeast Asia are complex. The availability of international aid across most of the global south has implications ranging from allowing activists some independence from the state to entrenching donor-driven agendas (Banks *et al.* 2015). In the context of competition for resources and influence amongst civil society organisations in the Philippines (Roldan 2013: 23), there is little political space for risky advocacies, such as rights for sex workers (Parmanand 2021). This paper shows that the Singaporean government's aversion to foreign funding for CSOs and to foreign influence in general (Singapore Ministry of Home Affairs 2016) has paradoxically reduced obstacles to sex work activism, while these obstacles have been entrenched in the Philippines, which relies heavily on United States (US) government funding tied to an anti-prostitution framework (Khan and Iyer 2019).

Finally, the Philippines is a "messy democracy" (Ford 2013: 7) and one of Asia's oldest electoral democracies. Weak political parties, low state capacity, and less stringent free speech controls create favourable conditions for civil societal activism relative to other Southeast Asian countries (Weiss 2007: 383). These factors also allow religious institutions, especially the Catholic Church, to wield significant political power and shape public discourse on gender and sexual rights (Leviste 2016), thus shrinking the space for sex work activism. On the flip side, the Singaporean government has actively curbed the influence of religion in politics (Lyons 2013: 197), reducing obstacles for Project X.

Methodology

Methods

This paper draws on in-depth interviews with Vanessa Ho, Executive Director of Project X, and seven leaders and members of the Philippine Sex Workers Collective. It also makes use of participant observation in the Collective's internal meetings, some of Project X's public-facing events from 2016 to 2022, and an analysis of both organisations' public statements, which are in English for Project X and a mix of English and Filipino for the Collective. I interviewed Vanessa in English and conversed with the Collective in a mix of English and Filipino. I use pseudonyms for all my interlocutors from the Collective. My engagement with the Collective was more extensive, having worked as a volunteer for the organisation since 2015 and enjoying generous access to their meetings and internal conversations. I spent roughly 30 hours speaking to Vanessa and attending Project X events such as film screenings, public lectures, and exhibits (in person and online), and over 150 hours in conversations, meetings, and panel discussions with members and leaders of the Collective. I also analysed relevant laws, policies, and activist campaigns on sex work or issues that affect sex workers in Singapore and the Philippines from 2000-2022.

For my documentary sources, I tracked the language used to describe sex work, the parties involved, and prescribed or mandated key interventions. For my interviews and participant observation with Project X and the Collective, I transcribed my field notes and recordings from each interaction and used reflexive thematic analysis (Braun and Clarke 2016) to identify themes and, eventually, core concepts. I wanted to focus on specific domains of discussion: political opportunities, threats, and activist strategies. Within these themes, key categories appeared, including formal laws, laws in practice, funding, anti-trafficking framework, HIV/AIDS, allies, opponents, space for engagement with the state, and exclusion. Strategies included outreach, confrontation, silence and anonymity, health and safety framing, engagement with the state, and challenging discrimination against migrants. Based on these codes, I identified broader themes of institutionalisation, confrontation, exclusion, and self-preservation. I then began theorising Project X's balancing act as resistance maintenance and the Collective's strategic in/visibility as resistance.

Epistemic Injustice

My research's methodological starting point was that sex workers, especially in the Philippines, have experienced epistemic injustice (Fricker 2007). Critical policy and scholarly conversations exclude them, make claims about the nature of their work, and prescribe interventions that target them. Fricker describes testimonial injustice as the lack of credibility accorded to certain actors based on prejudice against their identity (Fricker 2007: 17). For example, the Philippine Commission on Women (n.d.) describes female sex workers "as having been deceived or forced into prostitution... until such time when [they] start believing that there is no other life for them outside of prostitution," thereby preemptively devaluing sex workers' testimonies when advocating for labour rights. According to Fricker, hermeneutical injustice obscures a significant area of one's lived experience from collective understanding because of a lack of social resources to make sense of it (Fricker 2007: 154). The criminalisation and stigmatisation of sex workers make it challenging for sex workers to advocate publicly for themselves and shape societal understandings of their work in the Philippines. In Singapore, sex workers, especially migrant sex workers, face discriminatory gender, race, and class biases in social attitudes and policies.

When I first contacted the Collective through their Facebook account, "Tex" responded on behalf of the organisation that "[We] do not trust academics and researchers." They had encountered researchers in the past who "mined" their members for data, profited professionally, and then disappeared. "Why should researchers be able to advance their careers from sex workers' knowledge and experiences of suffering?" the group asked me in a Facebook message (10 August 2015). They were also concerned about intellectual accountability: On 11 August, Tex elaborated, "After we trusted them, many of these

¹There are other activist individual sex workers and feminists in Singapore and the Philippines. Nonetheless, these two organisations are the most organised, visible, and consistent advocates for sex worker rights, so I chose to focus on them.

researchers distorted our stories, especially about clients and pimps, to fit their anti-prostitution agenda; usually the victim narrative that is popular in the anti-trafficking sector, and what's worse is they take platforms that belong to us and speak for us" (see also Jeffreys 2010, for similar observations). I acknowledged these concerns, and despite the Collective's initial hesitation, they agreed to a research collaboration with me: "We would be happy to grant your request, but we are careful not to have this construed as a benevolent action on your part to help or aid us - we don't need saving" (26 August 2015). They also invited me to work with them as a volunteer to assist with grant applications, translate English materials into local languages for members, and help review research and media requests. Project X has an internal system of vetting researchers and granted my request after I provided them with information about my research project.

Participatory Research with the Collective

I envisioned my research as a response to the epistemic injustice that sex workers experience, especially the Collective. To avoid reproducing violence and extractivism in research with stigmatised populations, I made two crucial decisions at the outset. First, I began from the point of "conscious partiality" (Mies 1983: 122) towards my interlocutors while preserving space for critical and academic reflection. I remained open to their stories' messiness, tensions, and contradictions and agreed beforehand that I might probe and critique their responses in our conversations and my writing.

Second, I chose a participatory research method in my work with the Collective that explicitly positions them as a knowledge partner rather than an object of intervention (O'Neill 2010). This methodology entailed working with them to ensure that the research objectives reflected their needs and interests, helping me produce research that is valuable to academia and the sex worker community (Lowthers *et al.* 2017: 3). I presented the organisation with a rough list of questions I wanted to ask, which they modified and extended. We also discussed appropriate compensation for their time and intellectual labour. Throughout the research process, I received guidance from them on how to safeguard their privacy and security, and I consulted with them about publishing sensitive information that could politically impact them personally and organisationally. I interviewed Vanessa in Project X's office and the Collective's leaders and members in restaurants, bars, parks, and homes because they do not have an office. I have provided the Collective with a summary of my conclusions in Filipino, and they regularly draw on our collaborative research in their advocacy and fundraising. Despite the research's formal conclusion, the Collective and I have ongoing conversations about power and representation in discussing the issue of sex work and my research in public forums (when to speak with, when to speak for, when to cede platforms exclusively to sex workers) (Alcoff 1991).

The recognition that my "social and institutional situatedness shapes the results of my analysis" and my relationships with my interlocutors also informs my research (Varga-Dobai 2012: 4). Sex work researchers have documented that respondents from hidden and stigmatised populations may "tell you what they think you want to hear," especially if they have concerns about privacy, confidentiality, and the researcher's social judgment (Shaver 2005: 297). I strove to avoid this issue and minimise power asymmetries in the research process, especially since the Collective is in a socially and politically more precarious location than Project X. Therefore, I opted for *pakikipagkwentuhan* (roughly, storytelling and chatting, usually in groups and occasionally, individually), a more collaborative and participatory method than conventional interviews.² I wanted a more reciprocal relationship with them and clarified that I viewed them as dialogue partners who could also ask questions and introduce topics (Wahab 2003: 632-633). Group conversations are a useful feminist method because they reduce the researcher's power over participants and generate interactive and in-depth data (Wilkinson 1998: 14). These provided a setting for my interlocutors to ask each other questions, support each other, and even tease and disagree with each other, enabling them to help steer the direction of the conversation and my research process.

²I still use "interview" in my references because there is no English equivalent for the term *pakikipagkwentuhan* as a research method.

A Note on Language

The language frequently describing individuals who sell sex depends on whether one considers it 'work,' leading feminists to disagree (Global Network of Sex Work Projects 2013). Those who argue that society should never consider the sale of sex as work because it is exploitative in a way that is distinct from all other forms of labour prefer the term 'individuals in prostitution' or 'prostituted women' to emphasise the absence of individuals' agency (Mackinnon 2011: 272-274). I use 'sex worker' throughout this paper because the organisations I collaborated with prefer this term to describe individuals who exchange sexual services for money or something of value. The term acknowledges their work and rejects stigmatising or paternalistic language (Leigh 1997: 230). I use 'prostitute' or 'prostitution' when specific groups prefer those words. This paper does not rehash the debate on whether society should consider sex work as work (for a summary of the different perspectives, see Showden 2011: 135-155). Instead, it accepts the objective of sex work activists to destigmatise and decriminalise sex work and examines how they frame their advocacy and adapt to political, legal, and social constraints.

Overview of sex worker demographics in both countries

The Philippines is a middle-income country, with a fifth of its population living under the national poverty line (Philippine Statistics Authority 2018). Conversely, Singapore is a high-income country with a huge migrant population across different occupational sites. Sex workers in both countries operate on the streets, online, and in establishments such as bars, massage parlours, and brothels. In both countries, sex workers are predominantly women, including transwomen, and there is a significant minority of male sex workers. The estimated 400,000 adult sex workers in the Philippines are predominantly local, with many having migrated from rural areas to urban centres (Hugo 2017: 21; Modino, 2010). Sex workers in Singapore include some locals and migrants from China, the Philippines, Vietnam, Malaysia, Thailand, Indonesia, Cambodia, Bangladesh, and Sri Lanka (Yea 2020: 119). Of the 10,000 estimated sex workers, only 1,000 work in regulated brothels (Teo et al. 2019). More recently, sex workers have moved from red-light districts such as Geylang to suburban areas with concentrated subsidised public housing (HDB heartlands) to avoid police raids, high rent, and fierce competition for clients (Yea 2020: 131-132). Due to social distancing requirements in 2020-2021 during the height of the COVID pandemic, sex work surged online globally, including in Singapore and the Philippines (Tan et al. 2022). In-person sexual transactions have resumed since pandemic regulations eased.

Overview of the Institutional Environments for Sex Work Activism in the Philippines and Singapore

In this section, I present the relevant features of the institutional environments (i.e., laws, policies, practices, dominant ideational structures, and relevant civil society stakeholders and funding streams) in both countries (March and Olsen 2006: 3). I do so to compare opportunities and threats to activism, especially in gender and human rights spaces, and situate prospects for sex work activism within these contexts.

The Philippines

Currently, a confusing mix of laws governs sex work in the Philippines. The Revised Penal Code (RPC) of 1930 criminalises the sale of sex and prohibits immoral doctrines, obscene publications, and indecent shows (Articles 201 and 202). The Anti-Trafficking Law of 2003 considers paying for or profiting from the prostitution of others as a trafficking offence, casting clients and third parties as traffickers and, therefore, prostitutes as victims. The Magna Carta of Women, enacted in 2009, also constructs prostitutes as victims by citing prostitution as an act of violence against women for which they require protection. The latter two laws are in tension with the criminalisation of selling sex in the RPC, which remains valid because it has not been repealed. Under any of these laws, police raids are a core intervention against sex work, whether to arrest or rescue sex workers. At the same time, other laws hint at a more pragmatic approach. Under the umbrella of HIV/AIDS prevention, some local municipal and city ordinances require HIV education, condom availability, and STI testing and treatment of sex workers operating in licensed entertainment establishments in exchange for providing them 'health cards' that allow them to work at these venues (Godwin 2012). The confusion over whether the police should treat sex

workers as criminals, victims, or workers gives them vast discretionary powers. For example, a Quezon City ordinance (Ordinance No. SP 15-16, S-2005) mandates that sex workers are victims and that their clients and third parties should be penalised. However, the local police still regularly arrest sex workers, especially street workers, under the RPC (Local Government Academy 2011: 19). As a result, the precarity of sex workers increases because the police in the Philippines have historically engaged in violence against women and gender and sexual minorities. Moreover, a culture of impunity made worse by Rodrigo Duterte's war on drugs protects the police (Cabalza and Enano 2020; Parmanand 2019).

Since the enactment of the Anti-Trafficking Law, the Philippines Inter-Agency Council Against Trafficking (IACAT), the Philippine Commission on Women, and many women's organisations have advocated for an anti-prostitution law that classifies people who sell sex as victims to replace explicitly the RPC provisions that criminalise the sale of sex. This proposed law is pending in Congress, but anti-trafficking and women's rights sectors have tagged it as a "legislative priority" (IACAT Secretariat 2020: 6-7).

While the Collective opposes the criminalisation of sex work under the RPC, they also disagree with viewing sex workers as victims in need of rescuing, and a core aspect of their advocacy is to prevent the anti-prostitution law's passage. The organisation calls for sex workers to be meaningfully included in policy conversations and granted rights as workers. The Anti-Trafficking Law, Magna Carta of Women, and proposed Anti-Prostitution Law passed without any involvement from sex workers, despite public denunciations issued by the Collective on their social media (Global Alliance Against Traffic in Women 2021). Instead, anti-trafficking organisations regularly present testimonies from former prostitutes who identify as trafficking victims in legislative hearings for proposed anti-trafficking and anti-sex worker laws and their public advocacy (Roces 2012: 148), and these are taken to represent the experiences of all individuals in the sex industry.

Most conversations on sex work in the Philippines have been underpinned by nationalist depictions of prostitution as a violent site of colonialism and global inequality, with a focus on foreign predators and prostitution in US bases, sex tourism, mail-order brides, and the sexual exploitation of Filipina workers overseas (Law 1997: 250; Ofreneo and Pineda-Ofreneo 1998: 104; Tigno 2012: 28). The Philippine Left, which is significantly more organised and politically influential than its counterparts in Singapore, rejects the idea of sex work as work. This category includes leftist feminist groups such as GABRIELA, which condemns poverty but does not see sex workers as legitimate workers (Abad 2020). The Philippines is also the headquarters of the Coalition Against Trafficking in Women – Asia Pacific (CATW-AP), affiliated with the global Coalition Against Traffic in Women (CATW). It has successfully lobbied for applying trafficking laws to prostitution in some parts of the world to punish clients and third parties to "end the demand" for sexual services (Raymond 2004: 326). CATW-AP drove the successful campaign for the domestic Anti-Trafficking Law in 2003 and continues to influence conversations on anti-trafficking and women's rights in the Philippines (Roces 2012: 62).

The Church regularly speaks out against prostitution (Catholic News Agency 2010), constraining the Collective's ability to advocate for destignatisation. Even as its political power has declined, it strongly influences Philippine politics and the education system, losing ground only to even more conservative Christian organisations (Cornelio and Dagle 2019). Additionally, feminist nuns have played a central role in the Philippine women's movement, owing to their legacy of using their moral power to resist the Marcos dictatorship in the 1970s-80s through street marches and underground activism (Roces 2012: 36). While they have made valuable contributions in opposing violence against women, they still depict prostitution as inherently immoral. Feminist nuns founded several dominant women's rights organisations such as GABRIELA, Development Action for Women Network (DAWN), and Third World Movement Against the Exploitation of Women (TM-MAE-W), all of whom oppose prostitution (Roces 2012: 48) and campaigned for the anti-trafficking law.

US influence has also entrenched an anti-sex work position within the Philippine anti-trafficking and women's rights sectors. In its *Mandatory Standard Provisions for Non-U.S. Nongovernmental Organizations*, the US government requires organisations that receive federal funds for anti-HIV/AIDS or anti-trafficking programs outside the US to remain silent on prostitution or adopt an organisation-wide policy of opposing its legalisation and practice, describing it as inherently harmful, dehumanising, and contributory to trafficking in persons (US Agency for International Development 2022: 81-82). The

US is the most prominent external source of anti-trafficking funding for the Philippine government and local and international nonprofits in the Philippines. Between 2003 and 2012, the US government allocated at least 16 million USD to anti-trafficking projects and programmes in the Philippines, based on incomplete US government data (US Department of State, n.d.). Since then, it has disbursed at least another 10 million USD through various anti-trafficking programs in the Philippines (US Embassy in the Philippines 2020).

Singapore

The People's Action Party (PAP) has always led the Singapore government, valuing above all economic growth and social stability as key to its political legitimacy (Chua 2012: 718). The PAP established broad restrictions on speech and activism, including state approval for associations of ten or more persons and prohibiting all registered organisations from engaging in "political activity" (Lyons 2013: 196). Other restrictions include administrative discretion and limitations on public assembly and speeches about politics, race, and religion that allow the police to disperse even a single demonstrator and censorship over media content deemed politically sensitive or a threat to social harmony (Chua 2012: 716). The PAP asks CSOs to adhere to a framework known as "out-of-bounds (OB) markers," which Lyons (2013: 196) describes as subjects that are off-limits or may threaten state-defined national values. The ruling party's appointees apply these OB markers, often retrospectively. The PAP, unwilling to share political space with any competing authority, has emphasised that religion has no role in secular aspects of civil society (Lyons 2013: 197). The LGBT movement has borrowed the PAP's rhetoric of social harmony to respond to attacks from religious institutions (Chua 2012: 737). PAP's restrictions on religious influence reduces a common barrier for sex work activists that can be found in other countries such as the Philippines.

Singapore's approach to sex work has been mostly pragmatic, with an intentional state-managed approach to licensing and zoning. Chapman-Schmidt (2015: 1) describes the regulation of sex work in Singapore as "a system of informal rules and protections hidden in the shadow of formal legal institutions." He explains that there are effectively two distinct sets of rules and practices that apply to sex work. The law 'on the books' is largely impermissible: while purchasing heterosexual sex is legal, all the practices necessary to facilitate it are not, including soliciting, operating brothels, or even loitering (Champman-Schmidt 2015: 7). This paradox renders sex work functionally impossible from a strictly legal standpoint. However, an extra-legal framework that significantly departs from the law regulates sex work in practice. The Criminal Investigation Department (CID) oversees an informal arrangement among law enforcement, sex workers, and brothel owners that permits the licensing and zoning of brothels and a sex worker registration system for both local and migrant sex workers (Champman-Schmidt 2015: 7). Ho (2015: 2-3) describes it as a 'yellow card' system, where sex workers (mostly migrants) find a brothel owner willing to employ them and apply to the Anti-Vice Police. However, because the process is opaque and off the books, it leaves migrant workers vulnerable to extortion and deception by middlemen. Furthermore, Section 19 of Singapore's Miscellaneous Offices Act (Public Order and Nuisance) prescribes fines or imprisonment for "any person found persistently loitering or soliciting for the purpose of prostitution" or "any other immoral purpose," rendering street-based sex workers vulnerable. Law enforcers have wielded other laws against public obscenity, gross indecency, and homosexual acts, especially against trans sex workers (Project X, n.d.).

While the Philippines was the first Asia-Pacific country to ratify the Anti-Trafficking Protocol, enact a domestic law, and consistently define anti-trafficking priorities based on the US Trafficking in Persons (TIP) Report (Renshaw 2019: 134), the Singapore government has a vexed relationship with anti-trafficking. The PAP regularly pushes back against the TIP Report (Singapore Ministry of Foreign Affairs 2010 and 2011). However, it also engages in "pretence politics": publicly staged anti-trafficking through tightly regulated stakeholder forums and anti-vice raid operations, while also defining trafficking so narrowly that it applies only to a small number of victims (Yea 2020: 88). Chapman Schmidt (2015: 2) argues that recent police raids on commercial sex establishments are more for image control and performative compliance with the US TIP Report than a commitment to ending the commercial sex industry. He suggests that the extra-legal approach allows the state to deflect criticism from the US TIP Report by pointing to strict official laws against sex work while getting away with enforcing more pragmatic policies on the ground (7). From around 2010-2017, CSOs pushed the Singaporean government to adopt the

anti-trafficking framework to regulate the sex industry and protect other vulnerable migrant workers, such as domestic workers, but they were unsuccessful (Yea 2020: 106).

Furthermore, Singaporean organisations do not receive significant anti-trafficking funding partly because the PAP discourages foreign funding for CSOs. Eventually, the absence of sustained anti-trafficking funding and a lack of interest from the Singapore government meant that the anti-trafficking paradigm "did not really stick" as an approach to the sex industry as it has in other countries by generating momentum for ending prostitution (Interview with Vanessa Ho 2022). Nonetheless, anti-vice raids, whether tied to anti-trafficking or other agendas such as gentrification, continue to perpetuate the stigmatisation and vulnerabilities of sex workers, especially migrants (Yea 2020: 130). Project X regularly condemns these police raids (Project X 2022c).

In my interview with Tex and other leaders of the Collective in 2018, they summarised their most significant threat as the hegemonic dominance of anti-trafficking discourse in the Philippines. They also specified the continued criminalisation of the sale of sex, US donor funding tied to an anti-prostitution pledge, police corruption, a long tradition of religious influence, and anti-sex work feminism with transnational links. Their inability to register the Collective legally because of the criminalisation of sex work forecloses many entry points for funding, resource mobilisation, and sustainable advocacy.

Tex and other leaders of the Collective identified the relatively open cyberspace as their safest option for resistance, as well as engagement with the slowly emerging younger generation of journalists, researchers, and feminist and queer activists less tied to anti-sex work positions. Vanessa Ho (Interview 2022) identified stringent restrictions on offline and online public-facing activism in Singapore, opaque policies on migrant sex workers, and negative attitudes against migrant sex workers (and low-wage migrants in general) as chief threats to activism. However, the absence of a strong anti-sex work lobby, the openness of local feminist and LGBT movements to sex workers, and the PAP's pragmatic rather than moralistic approach to sex work offer vital political opportunities. Globally, funding for sex worker rights has steadily increased (McIntyre 2017). Organisations such as Amnesty International and the World Health Organization declaring their support for the decriminalisation of sex work and warning against excluding sex workers from policy conversations have further spurred such funding (Amnesty International 2016: 2; World Health Organization 2012: 8). Nonetheless, it is still limited and has not reached Project X or the Collective because the former is in a high-income country and not seen as a development priority, and the latter is not legally registered and does not have a clear organisational structure.

In the following sections, I discuss the Collective and Project X's efforts to challenge the criminalisation of sex work, improve sex workers' working conditions, and navigate class, migration, and gender hierarchies within sex work.

Philippine Sex Workers Collective: Trial and Error, Social Media Confrontation, and Strategic Invisibility

Given their narrow space for claims-making, the Collective's tactics are less well-defined than Project X's. They were upfront about the "trial and error" and discontinuous nature of their activism and recognised that they were often forced into a "reactive position" (Interview with Tex and others 2018). To understand the Collective's attempts to adapt strategically to their institutional environment, I will first identify tactics that a lack of political opportunities has foreclosed and then discuss the Collective's twin approach of online confrontational politics and strategic in/visibility.

The Collective's members intended it to be a form of grassroots movement-building. However, a massive lack of resources and the COVID pandemic, which even rendered some leaders and members homeless, undermined this aim (Philippine Sex Workers Collective 2023). The Collective exists in a vicious cycle of needing the resources to access the funding they require to strengthen and expand their organisation. In my interactions with them, the fatigue and precarity experienced by their members was evident, and barring a few interviews with journalists and student researchers, their activities ceased during the pandemic and recovery has been slow (Philippine Sex Workers Collective 2022).

Tex noted that members initially set up the Collective as an alliance of different sex worker organisations that each had a vote. However, the Collective's decisions have fallen to a smaller group of founding

leaders who hold ad hoc consultations with members (Interview with Tex and others 2018). They did not have a clear system for settling disagreements on strategy, but emphasised internal dialogue and consultation (Interview with Diane, Elsa, and Jackie 2019).

The Collective engages in mutual aid sporadically: they raise money to pay for the hospital bills of sex workers harmed by clients or the police, bail out sex workers under arrest, and buy groceries for sex workers who could not afford them during the pandemic (Interview with Jackie 2021). However, they lack access to sustainable funding to do so regularly. They are also unable to position themselves as a public health service provider because other established organisations in the HIV and public health arena already occupy this space and include direct services for sex workers as part of their programming but may not openly advocate for sex worker rights (Interview with Diane, Elsa, and Jackie 2019). Local governments also offer free STI check-ups and treatment through social hygiene clinics. Tex (Interview 2020) noted that while there is a seat reserved for sex workers on the Philippines HIV-AIDS Council, the Collective is ineligible because they are not legally registered. Therefore, the seat is currently occupied by a representative of "people in prostitution", who do not hold the view that sex work is work. Leaders of the Collective pass on their recommendations for HIV/AIDS laws and policies to individuals and organisations that know them.

The Collective emphasises LGBT inclusivity internally but has been less successful in publicly collaborating with traditional sex workers' allies, such as LGBT groups and HIV organisations. In a 2016 interview, Tex explained that several individual members of these organisations privately support decriminalising sex work yet "have indicated to the Collective that it would be politically costly for their organisations to publicly back sex worker rights." Many otherwise progressive organisations in the Philippines maintain an anti-sex work position or at least choose not to support the rights of sex workers publicly (Parmanand 2021). The proponents of a proposed anti-discrimination law refused to include 'work' under their definition of protected categories, despite the Collective's multiple requests, and the Philippine chapter of Amnesty International voted against Amnesty International's institutional stance in favour of decriminalising sex work (Electronic correspondence with Tex 2018). The Collective has also established links with sex worker organisations around the world, such as Thailand's Empower, the UK-based English Collective of Prostitutes, and the US-based Call Off Your Tired Ethics (COYOTE) to share best practices and amplify each other's messages on social media. Nevertheless, there is a limit to transnational organisations' effectiveness because sex worker rights advocacy is particularly vulnerable to accusations of being a Western import (Ruiz-Austria 2006: 107).

Furthermore, despite sending emails to official government accounts and publishing online statements demanding a voice, the Collective has never been invited to government-led anti-trafficking or women's rights policy consultations (Interview with Tex and others 2018). Since collaboration with dominant women's groups, the police, and anti-trafficking groups has proven to be infeasible and unsafe, they engage in direct criticism of government agencies and anti-trafficking and anti-prostitution NGOs, primarily by leveraging social media and avoiding forms of visibility that are harmful.

On 23 September 2016, the Collective posted on their Facebook page, "The Inter-Agency Council Against Trafficking (IACAT) Philippines convention is ongoing. Surely, they would be talking about us and planning what they would do to 'help' us, so we are sending them a series of messages through this page." An image accompanied this message with the words, "Don't talk to me about sewing machines. Talk to me about workers' rights." On 27 March 2018, they posted on Twitter, "It's election time. Now, if these people seeking office hate sex work that much, could we at least demand that they put into their campaign agenda that they would work at setting up a sustainable exit strategy program for women wanting to leave the trade?" The Collective's strongly-worded social media attacks on the anti-trafficking sector and public officials, in general, are a form of claims-making, demanding recognition, challenging the socio-moral order, and engaging in alternative world-building.

Since 2013, these public statements have been somewhat effective. According to Tex (Interview 2023), the Collective has received 10-20 interview requests since 2019 from journalists and student researchers in their Facebook inbox every week, a significant increase from the occasional one or two a month they got in previous years. Before 2021, Facebook regularly took down the organisation's page for "violating community standards" in response to anti-sex work users' targeted reporting. Since then, they have stayed online and expanded their following to 13,500 on Twitter and 3,500 on Facebook. They have

also observed an increasing use of the term "sex worker" in media articles compared to the more commonly used "prostitute" prior to 2016 and rising media references to the Collective's decriminalisation advocacy as a counter-narrative to dominant anti-sex work views (Interview with Diane, Jackie, and Elsa 2019).

One political opportunity that opened through the Collective's social media is activating a younger generation of feminist activists, journalists, filmmakers, and academics (Bagsic 2021; Baua 2021; Now Open 2021; Philippine Sex Workers Collective 2015). Nonetheless, Tex (Interview 2016) noted, "We might have a better chance at persuading younger people, but still, these engagements require labour and resources, which we do not have." Delia (Interview 2021), a student sex worker who recently joined the Collective, declared, "A lot of people who want to do research on us do not offer any compensation or support, and we do not have a way of ensuring that they will truly guarantee our privacy and anonymity, which for many of us is a matter of life and death."

Despite their active and aggressive criticism online, the Collective's members and leaders take various steps to preserve their anonymity, such as wearing masks in photographs, refusing to be photographed or recorded, and concealing their identities in recorded events. Many of their friends and families are unaware of their work. Diane, Elsa, and Jackie are leaders and members of the Collective who work with HIV organisations and serve as peer educators. However, they do not disclose their sex work experience in public forums and are selective about disclosure, even within HIV organisations. Instead, they prefer to speak as part of other key populations such as "migrant women" or "individuals living with HIV" (Interview 2019). Moreover, the Collective's leaders and members generally avoid engaging with actors they consider unsympathetic to sex worker rights and representation.

The Collective sometimes internally disagree on the boundaries of their commitment to strategic invisibility. In 2019, a major international grant-giving body that targets marginalised groups, including sex workers, agreed to fund the Collective for two years, provided that a more established, legally registered host organisation sponsored the group (Interview with Diane, Elsa, and Jackie 2019). The host organisation would handle the financial administration for the grant, contribute to defining the Collective's objectives and activities, and receive a fixed portion of the grant. Some members of the Collective were willing to accept these terms in exchange for sustainable salaries and funding to recruit members and develop the organisation (Interview with Diane, Elsa, and Jackie 2019). Others viewed them as "an arrangement that undermined the authority of sex workers" because they implied sex workers' claims were "valid only when they were presented by more politically legitimate actors working with sex workers" (Interview with Tex 2020). The former agreed with these concerns but believed that because the Collective lacked rigorous financial management systems, reporting mechanisms, and a secure bank account, the host institution requirement was their best bet for funding (Interview with Diane, Elsa, and Jackie 2019). Ultimately, these members chose to access this grant under a host of their choice, a health-focused organisation with a history of collaborating with sex workers but not led by sex workers. However, some leaders of the Collective were not involved.

The Collective's strategic invisibility challenges the idealisation of publicity and visibility as necessary for activism. Lollar (2015: 305) defines 'strategic invisibility' as a "conscious decision to be emotionally, verbally, and/or physically in the background, silent, or unseen." For Lollar (2015: 300), invisibility is not the passive acceptance of one's situation since it involves careful decisions about "where to be involved, who to be actively involved with, and how to voice oneself," a logical way of resisting threats. In this case, the Collective controlled their social media messages but remained individually anonymous and refused to engage with actors they did not trust. The group explained that this strategy was necessary for safety and to "avoid having our stories twisted to justify some form of criminalisation of our work, to avoid being used by opportunistic journalists and researchers who would then speak for us, and to make clear to those who think of themselves as saviours that we do not need or want to be saved" (Interview with Tex and others 2018). Jackie (Interview with Tex and others 2018) previously told a journalist that she was wary of reporting abusive clients to the police, underscoring how criminalisation harms sex workers. The published report characterised Jackie's story as a reason why sex work is violence against women and should not be tolerated, an argument at odds with Jackie's interpretation of her experience. The common assumption about marginalised groups who are silent, such as sex workers, is that they lack agency. However, in this case, their strategic silences are agentic. They reflect a recognition that their discursive resources are limited and a refusal to participate in the possible perpetuation of hegemonic discourses about sex work that they oppose.

Project X: Resistance Management through Pushing the Boundaries of Institutionalisation

As established earlier, the Singapore government maintains a more pragmatic approach to sex work, and anti-sex work organisations have not gained a foothold in policy-making and activist spaces. This situation and the limits of religious influence on politics have created a relatively more open political space for Project X. However, there is not much resonance for sexual rights claims in Singapore, and the PAP and the general public are unlikely to tolerate overtly confrontational tactics, even online (Chua 2012).

In this section, I examine Project X's strategy of embracing "institutionalisation" and service delivery while claiming greater social and economic inclusion for sex workers, many of whom are migrants. Vanessa Ho (Interview 2022) describes Project X's overall approach as "shape-shifting." I draw on Majic's (2014: 27) discussion of 'resistance maintenance' to analyse how Project X sustains its balancing act of fostering contentious ideas without retaliation from the state (2014: 27).

Project X is a registered NGO that abides by state regulations for nonprofits, including having a Board that is relatively involved in strategic discussions. One of Project X's main thrusts is providing direct services to sex workers, such as free STI tests and condoms. These services are valuable because they would otherwise be expensive and inaccessible. While Project X continues to advocate for better state services for sex workers, their engagement in direct services positions them as "indispensable service providers in the public health sphere" (Interview with Vanessa Ho 2022). It also allows them to engage with a hard-to-reach population in a way that state agencies and other organisations cannot.

This arrangement has helped increase Project X's legitimacy and status as an expert on sex work and its related issues. They have a working relationship with the police and several state agencies and ministers and directly participate in government-led consultations on anti-trafficking, pandemic management, and public health. They raise issues pertaining to sex workers' health and safety and migrant sex workers' vulnerability in closed-door meetings. Vanessa (Interview 2022) described the group's comments in these meetings and their public-facing language as "deliberately less antagonistic" toward the state. She explained, "We frame our advocacy strategically to focus on specific improvements in existing practices or interim reforms ... for example, by showing how a lack of transparency in the yellow card system allows third parties to scam migrant sex workers and reduces their bargaining power against employers and customers." Indeed, the PAP has historically been more willing to consider claims from constituents that do not directly challenge its authority or social stability (Chua 2012). Vanessa also shared that Project X "generally avoid[s] strategies that may 'embarrass' the PAP internationally," assessing that the PAP is unlikely to respond positively. Moreover, they want to avoid accusations of "Western imposition" on "Asian values," a strategy that Chua (2012: 738) earlier observed in relation to the local LGBT movement.

Project X regularly advocates for the decriminalisation of sex work in their research documents and public-facing communications (Project X and Allard K. Lowenstein International Human Rights Clinic Yale Law School 2015: 43). However, they are cautious not to "drive the government into a corner when it comes to taking a clear position on sex work" because doing so could backfire and lead to crackdowns and a ban (Interview with Vanessa Ho 2022). In situations where legal/formal demands for decriminalisation could prove harmful by forcing the PAP to respond categorically to a demand lacking widespread support, Project X's focus on pragmatic goals is a form of strategic adaptation. This strategy recalls Chua's (2012: 723) observations about the LGBT movement in Singapore striking a balance between "pushing boundaries" and "toeing the line," requiring activists to interpret signals carefully in their broader environment and account for shifts in legal regulations, government rhetoric, and cultural norms to adjust their tactics.

Furthermore, Project X's nonprofit status and service provision capacity have helped secure more sustainable funding. They rely on Singaporean donors and, occasionally, corporate sponsors. Despite multiple attempts, they have not secured significant funding from international organisations. Framing their work as a form of public health intervention and protection for vulnerable migrants "makes it easier to access funding from local donors who tend to be persuaded by pragmatic goals such as reducing STIs and

unwanted pregnancies" (Interview with Vanessa Ho 2022). This strategy also helps the group cover overhead and staffing costs and provides resources for outreach, especially to street sex workers and migrant sex workers. During the pandemic, a significant number of Singaporeans donated their stimulus cheques to Project X, which was used to assist migrant sex workers in returning to their home countries.

While there are legitimate concerns around the possible depoliticising effects on activists of formally engaging with the state, adopting service delivery as a core function, and relying on pragmatic funders, Project X has maintained their transformative agenda through a process that Majic (2014) describes as 'resistance maintenance.' This happens in multiple ways: even within the institutional constraints of their interactions with state agencies, their mere presence in the room and physical proximity to decisionmakers make it harder for other stakeholders to push for criminalisation and punitive approaches to sex work. Additionally, their presence helps normalise a focus on health and safety "from the inside," exemplifying a dynamic and interactive relationship with the government rather than co-optation (Majic 2014: 33). Project X's provision of free condoms, STI testing, and mental health support for sex workers serves as an entry point for consciousness-raising and community-building. Majic (2014: 34) refers to this intersection between service provision and political outreach as "oppositional implementation," a component of resistance maintenance. By providing essential services, Project X meets and engages with the most vulnerable sex workers, initiates conversations about safety, working conditions, and reporting mechanisms for abuse, and informs them that there is a broader community of sex workers and allies who can assist and advocate with and for them. In addition to service provision, Project X's less confrontational strategies, such as arts-based advocacy and film screenings, have gained support from groups such as students and young professionals with progressive inclinations that may not have initially extended to rights for sex workers. These strategies are a creative form of claims-making and community engagement because they provide a space for sex workers, allies, and potential allies to "gather, develop a sense of community, and be exposed to oppositional political discourse" (Majic 2014: 33). These events regularly emphasise the vulnerabilities of migrants and trans individuals in the sex industry, thereby exposing the harms of popular discourses and social hierarchies, a necessary first step in challenging them.

Project X also works with activists in the LGBT, women's rights, and migrant rights sectors, and they regularly share space in media interviews, panel discussions, and other public fora. Vanessa (Interview 2022) notes that progressive organisations in Singapore are motivated to work together and support each other, partly because of the small number of organisations and activists and the shared need to frame their advocacy as "uniquely tailored to the Singaporean context." AWARE, Singapore's biggest women's rights organisation, does not espouse an anti-sex work agenda. AWARE awarded Ho the "Young Activist Award" in 2014, regularly collaborates with Project X, and platforms Project X's work and expertise (AWARE 2011, 2021). Project X has a visible presence at Singapore's Pink Dot celebration and publicly advocates for repealing Section 377A of Singapore's Penal Code, which criminalises sex between consenting male adults (Project X 2022a). They publicly express vigorous support for trans rights, critique the exclusion of pre-op and non-op transwomen from the "yellow card" system, and have several trans sex workers on board as full-time staff and volunteers (Project X 2022b, 2022c). Disproving the familiar trope of sex workers as "victims of the patriarchy," Project X's political activism demonstrates an ongoing commitment to radical sexual politics and the disruption of heteronormativity, even if circumscribed by the need for pragmatic resistance in the Singaporean context. Their published research, website, blog, and Instagram posts consistently espouse access to justice for migrants and LGBT individuals, groups that continue to face social and legal discrimination in Singapore. Additionally, they articulate sex worker rights within a broader framework of pushing for social protection and political agency for marginalised groups.

Conclusion

In analysing the paradox of why sex work activism seems to have thrived more in Singapore than in the Philippines, this paper complicates our understanding of features within different political environments that enable and disable activism, as well as activists' attempts to adapt strategically.

The experiences of sex workers in the Philippines expose the limitations of foreign funding and transnational advocacy in securing protection for certain marginalised groups. Despite the valorisation of transnational advocacy in the traditional literature on activism (Keck and Sikkink 1999), the Collective's experience shows that certain groups, usually those more "professional" and better organised, are in a stronger position to participate in it, sometimes at the expense of others. The dominance of the carceral, anti-sex work approach to anti-trafficking in the Philippines also shows the power of foreign funding to entrench donor-driven agendas, which may crowd out more rights-based approaches to social problems. The Collective's experience in applying for funding illustrates the potential exclusionary effects of the 'professionalisation' of development that requires organisations to have clearly defined bureaucracies, measurable targets, and a capacity to compile rigorous reports for small sums to participate in the political economy of aid (Banks *et al.* 2015). Conversely, while the PAP's aversion to foreign influence and funding and insistence on social stability and harmony may have curtailed more mainstream forms of activism, such as LGBT and women's rights in Singapore, it has also preemptively hindered some modalities of anti-sex work activism thriving in the Philippines and created space for Project X to establish itself as an authority on sex work and a valuable service provider.

This paper affirms that 'human rights' and 'development' are contested sites and embedded in hierarchies of power, where groups have unequal discursive and material resources. This circumstance gives rise to epistemic injustice that marginalised and stigmatised communities navigate using non-conventional forms of resistance. Project X's experience demonstrates that there are situations in which 'institutionalisation' can facilitate rather than weaken resistance. Institutionalisation requires adopting more instrumental instead of rights-based framings of sex work for some audiences. However, it also ensures organisational survival and sustainable resources, which Project X deploys for direct assistance to marginalised sex workers, outreach, and public advocacy for more structural changes. On the other hand, one should not interpret the Collective's strategic invisibility as an inherent lack of agency within sex work but as an indication of the silencing of sex workers and their willful refusal to engage in conversations that reproduce stigma and violence against them.

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