# Harm and Resilience among Prostituted Teens: Broadening our Understanding of Victimisation and Survival

Linda M. Williams

Department of Criminal Justice and Criminology, University of Massachusetts Lowell E-mail: linda\_williams@uml.edu

Based on qualitative research completed in the United States on pathways into and out of commercial sexual exploitation of children (CSEC), this article focuses on themes of harm, resilience and survival-focused coping by prostituted teens and makes recommendations for policy and practice. The research on which it is based takes a life-course perspective on pathways into and out of CSEC. Analyses of the narratives of homeless, runaway and sexually victimised (prostituted and trafficked) teens suggest the need for a more nuanced understanding of both harm and survival that has important implications for practice and policy communities responding to human trafficking within and across borders.

#### Introduction

Despite some important research on CSEC, for a number of reasons, the sexual victimisation of youth via prostitution has been understudied. As was the case with intra-familial child sexual abuse 30 years ago, sexual violence via prostitution may have escaped attention in large part because of the secrecy of the behaviours, the youth and vulnerability of the victims and the use of a variety of tactics by the perpetrators (including violence, fear, force, and 'grooming'). Further contributing to the neglect of this crime is the fact that often the children who are prostituted are 'thrownaways', or are poor, minority, runaway or drug-involved and garner little sustained public concern or attention because they are not empowered constituencies (Estes and Weiner, 2001).

Conflicting images are evoked by the words 'prostitution' and 'commercial sexual exploitation of children'. When referring to adults, some suggest that 'prostitution' could be reframed as 'sex work' (Agustin, 2008), although research suggests that even when prostitution is legalised it involves harm, violence and coercion that go beyond the average 'job' (Raymond, 1998; Farley, 2004a, b; Sullivan, 2005). While the debate about adult prostitution and its legalisation as 'sex work' is not the focus of this article, the findings presented here about prostituted<sup>1</sup> teens may have some implications for understanding adult prostitution. In this article the focus is on minors, that is youth under 18 years of age (although the exact age that designates adulthood may vary by jurisdiction and nation.)

Minors involved in the sex trade or trafficking, whether internationally or domestically, are often viewed as victims and not offenders.<sup>2</sup> Our social (and even legal) responses to prostituted children and youth, however, often belie this assertion. Indeed, in many states in the US, for example, teens who are found to have traded sex for money and who have attained a certain age (for example 17 in Massachusetts) can be and often are arrested and

charged in criminal courts. Recent research suggests that US law enforcement personnel are inconsistent in their treatment of prostituted juveniles (Finkelhor and Ormrod, 2004; Halter, 2007). This inconsistency may reflect the conflict between law enforcement driven criminalisation of prostituted youth and other statutes and regulations that define sexual contact by an adult with a 17-year-old as a reportable act of child maltreatment. Indeed child welfare agencies may place responsibility on the offending adults or on other adults who failed to protect the youth. Child welfare agencies, therefore, often recognise prostituted juveniles as victims in need of protection. Because of their demeanour and behaviour prostituted girls and boys, however, are often held in great distain by social service providers and the community in general (Friedman, 2005) and they may be seen as offenders. The presentations of the teens as victims and documentation of the negative consequences (Farley, 2004a; Cooper et al., 2005) is seen by some as directly contradicted by statements teens may make about the 'attractions' associated with prostitution. Girls and boys may assert that they are 'doing what they want' or (for girls) that they love their pimp or 'daddy'. They may assert that they do not view themselves as victims. While it has been reported that both girls and boys are insidiously drawn to 'the life' by the deceits and outright lies of those who recruit them — the lures of parties, drugs or even the simple shelter and food that they may also get as part of the payment barter - these notions not only contribute to their assessment that they control their fate as Friedman (2005) asserts, but also to the ambivalence with which they are viewed by the criminal justice system and the community.

United Nations proclamations and recent trafficking legislation around the globe assert that persons under 18 engaged in commercial sex are victims, that those who are underage cannot be seen as volunteering to be trafficked. Yet many nations and legal jurisdictions treat juveniles involved in prostitution as offenders. The discussion of these legal issues is fraught with debate on the level of harm to the victim and the exercise of 'choice'. Questions are raised: Is prostitution of teens a matter of choice or coercion? Who can consent? And, more importantly, the question before us today: Who is harmed? Friedman (2005) and many others present evidence that prostituted girls are victims of pimps and johns who exploit them and that there is usually little individual choice involved. The victim discourse presents evidence that teens usually turn to prostitution as a result of desperation or due to manipulation by adults (Priebe and Suhr, 2005).

This point of view minimises a third though seldom mentioned identity which poses a challenge to the victim—offender dichotomy — that of 'survivor' (Moore, 2006). This notion builds on analytic approaches focusing on 'street youth' as resilient and as possessing capabilities to enact change in their own lives (Panter-Brick, C., 2002). Each of these perspectives on prostituted youth would lead to differing and sometimes opposing social policy responses (Bittle, 2002; Williams, 2009). The overlap of these identities (suggested by Figure 1) is elucidated in the research presented here.

## Pathways study research design and sample

Prior research on violence against women and sexual victimisation has highlighted qualitative research as a useful tool for rich description of phenomena (Dalla, 2002; Banyard and Williams, 2007). In addition, in framing the 'Pathways Study' the literature suggested a need for a life course approach to developing policy and practice responses

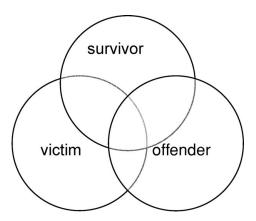


Figure 1. Overlapping identities of prostituted teens

to CSEC via prostitution (Williams, 2003). The Pathways Study was designed to examine pathways into and out of commercial sexual exploitation of children (CSEC) via prostitution and to provide useful information to practice and policy communities for prevention and intervention.

This research uses a mixed method and highly collaborative design with a strong qualitative research focus. It integrated researchers, service providers, grassroots organisers and young women and men who have escaped CSEC into the design, data collection process and data analysis. A critical component of this project is that it reflects the voices of the youth themselves — through their narrative accounts of their lives and pathways to CSEC. The adolescents we interviewed were not predominately involved in large cases known to law enforcement — they were mostly runaway, homeless or 'thrownaway' youth.

Interviews were conducted in the US with 61 teens (15 males, 44 females and 2 transgendered youth) aged 14-19, who have experienced sexual violence as prostituted teens or who are runaways at risk for such victimisation experiences. Following a protocol approved by the Institutional Review Board, interviewers contacted participants at dropin centres or service agencies focused on street outreach and work with high-risk youth. These agencies provided an array of services, ranging from meals and a place to do laundry to shelter, counselling and referral services. The teens who met the criteria for inclusion (away from home at least one week, living outside of parental control, mostly with no fixed abode) and agreed to participate in the 1-2 hour long interview were provided with a \$30 gift card along with information about available services. The interviews took place in the US in the Boston metropolitan area and Washington, DC. Twenty-nine participants (24 females and 4 males and 1 transgendered youth) discussed their own CSEC experiences. They self-identified as Black or African American, Hispanic, White, Asian American, Native American as well as other ethnic and immigrant groups. In this article, the focus is on information from interviews with 24 CSEC involved girls. These 24 females were representative of the entire sample of girls in age and race. The young women were age 14–15 (n = 3), 16–17 (n = 9), 18–19 (n = 11) and unknown (n = 1). All spoke of experiences with CSEC that occurred before the age of 18.

The interview, though semi-structured in regard to specific topic areas to be addressed, was open-ended and could flow into areas that the participant wanted included in her 'story' of her life. The participant was carefully informed that we wanted to hear about life in 'your own words...the way you want to tell it'. Most were very responsive to this opportunity to talk to an adult who wanted to listen to them and use their words to, perhaps, help others. In general, the first 20 minutes of the interview focused on rapport building, discussions of what the young person held to be most important in her life and her identification of the most important factors that shaped her into who she is now. In this part of the interview, the participants frequently volunteered extensive information on family, peer and community interactions and supports. The interviewer asked about experiences with leaving home and running away followed by questions about experiences with trading sex for money, goods or a place to stay. These experiences were probed in detail. The latter parts of the interview generally revealed information on risk/protective/resiliency factors; health, medical and other self-described needs; service access and impediments to access; juvenile/ criminal justice history and perceptions of interaction with juvenile justice systems; and recommendations for changes in systems. At the end of the interview, debriefing occurred and referral services were made available.

The findings presented here come from in-depth, case-oriented study and qualitative analysis of the transcribed interviews. The qualitative software program, AtlasTi was used to assist in organising the data and examining connections between emerging themes (Strauss and Corbin, 1990). In addition, the interview transcripts were reviewed to uncover and analyze the participants' use of the word 'harm' and 'hurt', followed by re-examination of these sections to identify connections to key themes.

## Findings and themes

Key themes of harm, hurt and survival were identified. The analyses suggest the need for a critical examination of commonly held assumptions about offender, victim and survivor roles.

#### Interrogating harm

A key word search for the word 'harm' in the interview transcripts revealed that the word 'harm' is never used by the teens in their narratives. Instead they used the word 'hurt' to describe situations when they felt pain or were in pain, including what appears to be emotional and also physical pain. For example, a young woman age 17, pseudonym 'Betsy', told the interviewer:

He (boyfriend) did me very wrong [voice trembling]...he just did me a dirty... we were together for four years. And he really hurt me he really broke my heart ...

#### And later:

I was hungry and my stomach was growling real bad and I...I had no money to go and get something to eat...it hurt; it really did hurt.

Another young woman, 'Dionne' age 15:

My mother and my brother was hittin' me...I didn't think they was gonna stop hittin' me...I don't even want to think about it cause that's how bad it...it...it still hurts my hair.

Our interviews suggest that teens reveal that they were 'hurt' (and they described many experiences of being hurt, sometimes rather severely), but they never used the term 'harm'. It may be that the word 'harm' is not part of the teen lexicon. However, the word 'harm' also connotes injury and possibly a more enduring or permanent negative impact a sense that something has been altered. At times, the teens in using the word 'hurt' appeared to not refer to lasting harm and or damages or hurt that might be more enduring. The teens also clearly spoke about multiple experiences with what they labelled as 'hurt' and implied that these experiences contributed in some way to their current lives, but they did not, without further probing, mention these experiences resulting in a deeper harm. It is important to note that the interviewers did not probe the hurts mentioned to elicit the youth's reflection on whether there was a deeper or more enduring harm. This was in part because our goal was to hear the voices and attributions made by the youth on their own. Furthermore, we were keenly aware of the potentially vulnerable status of the youth. This kept us from probing the question of lasting harms in depth. It was our judgement that exploring such hurt for evidence of lasting trauma was not appropriate and would require careful assessment of safety and best be conducted by a trained mental health professional (Briere, 1997).

In assessing the harm reflected in the narratives, it is interesting that in two of the quotes (above) there is evidence that although the participants do not use the word harm, they suggest the hurt is still present. The voice of the teen in the first quote is trembling and she is near tears when discussing the hurt she feels because of the way she was treated at age 13 by her older 'boyfriend'. In the third quote, the young woman says her 'hair still hurts', a descriptive reference to the ongoing nature of the memory of the physical hurt. The way the teens talk about these experiences suggests some reluctance to acknowledge to others (and perhaps to themselves) the more lasting 'harm' of these events.

It is notable that the teens did not discuss the hurt they felt or make implications about 'harm' in the way that researchers, practitioners and policy-makers often use the term to reflect the enduring negative impact of child abuse, violence and adversity. This suggests that the attribution of harm made by adult responders may be just that, an attribution. While there is, of course, ample empirical evidence of the long-term negative effects of child maltreatment, the teens' narratives further underscore the point that they do not see themselves as harmed or damaged or at least do not present themselves as harmed. Understanding the presentation of multiple hurts without an underlying self-presentation as 'harmed' or 'damaged' has implications for discussion of how teens are likely to be perceived when they engage with those with whom they come in contact, such as criminal justice system actors (police, attorneys, judges and probation or corrections officers) as well also for our discussion of coping and survival.

Harm - key themes

When the transcripts were reviewed for key themes of harm (based on the researchers attributions about harm or harmful experiences), several themes were revealed:

Being abandoned and thrownaway. The teens expressed on many occasions the problems of being abandoned by a parent or by society, of being unloved or uncared for. Seventeen-year-old 'Rika' said:

My parents both told me when I was younger...'you are the accident that kept this terrible relationship together'...They are like, 'you shouldn't even be here'...You know, sometimes I think maybe she should have gotten that abortion...when I am in need and I ask for help, people are like, 'aw...fuck you!'... something like this shouldn't happen to a person.

Sexual and physical violence as harm. The teens gave many accounts of physical abuse, or being beaten by family members, associates (they do not call these violent associates 'friends'), those who sexually exploit them either as third parties (e.g., 'pimps') or as 'clients', 'customers' or 'johns'. Being prostituted is in and of itself a form of sexual victimisation. However, even beyond the inherent victimisation of the experience of being commercially sexually exploited (sexual conduct in return for a fee, food or clothing), the teens vividly describe rapes, beatings with objects such as baseball bats and cords, being stabbed, shot, burned and tied up. Eighteen-year-old 'Lilli' described the beating as 'death':

I ran into some bad people . . . and I was raped . . . <u>I was beaten to death</u>, like almost to death. I was . . . I was really hurt that day.

They told the interviewers about physical violence and fear. They also spoke about becoming numbed to the pain:

I got in the car. I charged him \$200... We do what we had to do... he was driving down this dirt road and... he pulled out a knife and he grabbed me by my hair and (during a rape) held the knife to my throat... he told me to get out of the car and wait and... I was standing there for like two seconds... And I ran like a bat out of hell. I ended up cutting most of my toe off that day too... I was running so fast I didn't feel it. (Whitney, age 17)

#### And from another teen:

Cause I could have been dead . . . like I don't know . . . like with different people and then . . . like I could have died . . . I was like gettin' into cars and they could have killed me and stuff. (Olivia, 18)

We learned from the narratives that for prostituted youth, sexual victimisation is continuous and on going. For them sexual violence is not a single and solitary, discrete event. Hundreds of men have sexual intercourse, oral sex or anal penetration with prostituted teens in the course of a couple weeks. Adolescent girls also are sexually victimised by the pimps (directly through rapes that the pimps themselves commit and also through the commercial sexual exploitation they purvey), and they are sexually victimised by the 'clients' who pay or otherwise arrange for sex with the teens.

In addition, many who are prostituted also had prior experiences of sexual victimisation by family members, acquaintances, peers and strangers.

When I was four I was raped by my [male relative]...when I told my grandmother what happened...she said I was lying and she beat me...and she tied me up to the pole and then she whipped me. (Zita, age 16)

Many have experienced physical violence and also the numbing of feelings about it:

She (parent) just beated me a lot around the ages of 5 and 10...but then I like got slowly immune to it...so it didn't hurt that much...[I] got choked so much...[later, when] she tried to do somethin' to me...it probably wouldn't hurt. (Dionne, age 15)

When the teens talked about important events in their lives that shaped them into who they are today — they often mentioned experiences with family violence. including: a long history of physical, sexual and emotional abuse; a history of attempting to protect siblings from abuse; and witnessing violence between adults. Many ended up on the street after perpetrating violence (sometimes in self-defence) against parents and parent figures. A number of the teens we interviewed reported that a call to police led to the teens' (not the parents') removal or relocation — often to an unsafe or untenable situation.

Many of the teens we interviewed not only experienced harm and hurt first-hand but also witnessed violence against others. Violence played a key role in the pathway on to the streets (escaping violence in the home) and sometimes, also, getting off the streets.

I've seen people get shot in the head in front of me over it...I've seen girls get shot...And I was just like 'what am I gonna do?' I had nobody so that's the only thing I knew how to do to make good money.

## And:

... she [another young girl who was controlled by the same pimp] was in the tub and I went in the bathroom; ... She was bleeding from her eyes ... she was bleeding from her lips. She was bleeding from her nose. She had scratches on her neck. I was just like 'oh I can't, I can't go through this. I can't.' And after I seen her I had to leave him [pimp] ... even if I didn't have no place to go... (Alisha, age 19)

These experiences foreshadow the next theme that emerged from the data — survival.

## Survival as a key theme

In reviewing the portions of the teens' narratives related to hurt and harm, often adjacent to or within the paragraphs or segments of the transcript on hurt were themes of survival and strength. For example, 19-year-old 'Star' told the interviewer:

The streets are not safe so...I mean survival is the <u>key aspect</u>, you know, of life being out there...I mean, people carry guns and knives...they sell drugs, they do whatever to survive...in my case survival is trying to find a place to sleep every night or trying to...make sure...that I'm not going hungry or...making sure that I'm safe.

So for this teen survival is an everyday task the *key aspect* of life. Simply put, she is a survivor if she is still alive. The dangers of violence, lack of shelter and lack of nutritious food are basic and require daily work.

Notably, at times survival may involve balancing competing risks. The streets are unsafe so where does a teen who has either run away or been pushed out of her home stay? The narratives reveal how the work of survival can lead to more risks and to a vulnerability to CSEC. 'Olivia', who had run away at age 13 and was attempting to survive life on the streets, told us:

I spent the night over their house and then they took me to this other man's house and then that's when...I had sex with that man and then he let me stay in his house for the rest of three weeks...he was really nice...he didn't ask me for nothin' else...He was just, like, whatever I want to do I can do it and then that was it.

This survival strategy (staying with seemingly 'nice' strangers) may have taken her to a more safe and secure place away from knife fights at a shelter or exposure to the elements if she stayed on the streets. It was, for her, survival. This was a common scenario for runaway teens. But often, over time, the demand for sex becomes more frequent and the young person is asked and eventually required to have sex with others bought to the house or who make connection on the streets or over the internet. At that point, 'survival' for the teen may be intertwined with vulnerability and victimisation and with being prostituted. As 'Olivia' went on to tell us:

Like some time I just be like tired and I don't want to do it but its like if I don't do it they gonna put me out. So I just do it  $\dots$ 

Another young woman, 'Lilli', age 18, clearly linked being prostituted to survival:

I was young, and...I just thought it was the right thing. I seen her do it, I was like, 'okay, I guess I can do it too'. You know?...I felt as if I wasn't going to survive if I didn't do it...Who was going to help me?

The concept of 'survival-focused coping' (Goodman et al., 2009) applies to the experiences of these young women. They knew that the basics they needed for safety and survival were uncertain and, as a result, clearly devoted a significant portion of their emotional, cognitive and social resources to navigating daily life. But as Goodman and her colleagues point out in their application of the notion of survival-based coping to impoverished victims of intimate partner violence, they also knew that the fallout of negative decisions or mistakes could be catastrophic. 'Alisha', age 19, told us:

I mean when you get the money it feels good . . . but at the point in time when you're jumpin' in and out of cars, sleepin' with this guy and then goin' to sleep with that guy you feel nasty . . . and that's when the pimp comes in to make you feel like you are wanted.

The concept of survival-focused coping recognises the constant negotiations and adjustments that survivors make to exert control in the face of dramatically limited and high stakes choices.

Survival and 'Independence' from any Pimp. Some teens also spoke about how they moved out of the control of a pimp. Often because of fear, but also at great risk to their safety, they took steps toward independence from a pimp. One young woman told us how, and clearly wanted the interviewer to learn this lesson on survival:

...when you're a female you can make any street a strip ... Any person, if you look good enough and if you're showin' enough, any person's gonna pull over and that's anywhere you are. You know what I mean? Do you understand that?...I didn't have nobody and I needed money...I started doin' it for on my own and for myself. (Alisha, age 19)

# Another described it this way:

See what happened when I left him?...That's when I started doin' everything for myself; like I didn't need a man...for anything, I just started doin' it all by myself. (Whitney, age 17)

# Implications and conclusions

This research identified some key themes that have not been commonly raised or recognised in the CSEC literature to date and which need further development and systematic study. This research suggests that coping and survival is a key theme for these high-risk runaway and homeless teens. The nature of their survival is complex and to some outsiders may barely resemble 'survival'. But, based on their own reports, they see themselves as having 'survived' the extreme difficulties that violence in their natal homes and on the streets have presented and as having negotiated life at a very young age to deal with hunger and poverty. Agencies need to understand how important this identification as 'survivor' is to the approach they take in assisting teens victimised by CSEC and why young women may rebuff their attempts at 'rescue'. Some teens may believe that they have in large part already 'saved' themselves simply by still being alive and this may explain why some commercially sexually exploited girls express resentment at being 'rescued' (Farley et al., 1998).

The teen narratives reflect themes of harm (or hurt) and survival and even agency that portrayal of these teens as one-dimensional 'victims' or 'offenders' misses. Yes, in no uncertain terms they have been victimised and in some jurisdictions they have also violated the law. The complexity of their lives and their survival skills, however, often are not taken into account in common depictions of the prostituted teen. This victim image may garner the support of charities and politicians, but this victim label may do them a great disservice in the long run because the portrayal of the weak, 'innocent', helpless victim is directly challenged by the teen the police or a would-be service provider encounters in the field. Instead of a sad-eyed victim, they confront a strong, wilful, survivor who looks and acts quite differently from the victims portrayed in the media. That survivor may be mislabelled 'offender' because she does not conform to the stereotype of victim (Williams, 2009).

There are even more difficulties when this perception of victims impacts the policies and services that are put in place. To escape this life, teens need a safe place to stay with nutritious food and services that respect their 'survivor' status and foster resilience. But often there are no services that meet the needs of these teens. Some teens see the streets as less harmful and more likely to help them 'survive' than the programs offered in their communities. These teens may be understandably reluctant to turn themselves over to adults, especially when they have found so many adults they have encountered to be untrustworthy.

Older teens need places to stay where they may be able to maintain some (appropriate) levels of autonomy and be empowered to make the situation work. Many prostituted teens have a long history of highly destructive families fraught with violence and dysfunction. Many have been in numerous foster care settings or have lived on the streets or with no permanent home for months and even years. They often have little trust in the child welfare systems that they have encountered in the past. Their experiences and the evidence available about their survival-based coping skills suggest a need for the development of meaningful partnerships between youth and social services. Without such partnerships that provide the youth a pathway to achieve freedom from the life of prostitution and the control of the pimp and without some meaningful control over their lives (including in many cases freedom from their families) (Bittle, 2002), there is little likelihood of success. Service providers need to understand that while victimisation via CSEC is damaging, for some thrownaway youth it can be part of their survival-focused coping/micro control.

Implementing a program that would meet the needs of prostituted teens requires a shift in the way we understand social control of youth and a major cognitive shift in how we view the relationship between the states, teens and their families. The narratives of teens who have been prostituted underscore the urgency of this need along with the complexity of making this policy change and putting the appropriate empowering supports in place.

As has been increasingly recognised in the literature on resilience and coping, there are some who exhibit exemplary outcomes after adversity, those who while not exceptional in their functioning show positive development in the context of adversity, and finally those who may initially show negative consequences of trauma but over time recover adaptive functioning (Banyard and Williams, 2007). Researchers have challenged models of resilience that reflect a linear pattern of increasing growth across time (Harvey, 1996; Barringer, 1992; Banyard and Williams, 2007). Luthar et al. (2000) suggest that there are developmental progressions to adaptation and survival and that new strengths, but also new vulnerabilities, may emerge with changing life circumstances. Patterns of resilience may thus be better represented as a spiral than a straight ascending line. This research on prostituted teens may be best understood in the context of such a spiral of harm and coping, recovery and resilience. Determining the trajectory will require future study of the lives of high-risk runaway and prostituted teens over the lifespan. The narratives of these prostituted teens suggest that being prostituted is not only a form of sexual victimisation and exploitation representing extreme vulnerability, but that it is also, for some, a form of survival-based coping (Goodman et al., 2009).

There are limitations to the current study. The most important of these is that it used a small sample not demographically representative of all prostituted teens or CSEC survivors. More work in this area is needed. However, given the relative paucity of research, the

study does add the voices of victims to discussions of harm, coping and recovery. Future research focusing on the issue of harm and survival for prostituted teens over time will be important. Such research also will have important implications for social responses to survivors of CSEC that are empowering and build on survivor's strengths.

#### Acknowledgements

Sincere thanks go to the many young people who have shared their stories in the hope that they will help others not to have to go through what they experienced.

The author would like to acknowledge the contribution Andrea Powell, coinvestigator and executive director of Fair Fund, Inc. and Mary Frederick, research associate University of Massachusetts Lowell, as well as, the assistance of numerous staff and agencies in Boston and Washington, DC.

This project was supported by Grant No. 2006-MU-FX-0060 awarded by the Office of Juvenile Justice and Delinquency Prevention, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice.

#### Notes

- 1 Discussion of this issue is fraught with language problems. Writing the words 'Child involved in prostitution' may suggest to some a willingness or voluntary involvement on the part of the child. Some prefer the term prostituted child or prostituted teen that makes it clearer that the prostitution is at the hands of someone else the customer, client (or some would call this person the rapist, john or trick) or the third-party exploiter (also called the pimp, panderer, procurer or ponce) who benefits from the acts and takes the money.
- 2 It is interesting that the term 'victim' is also fraught with problems. In a recent governmental document in the US, it was stated 'although the term "victim" is used throughout this solicitation as the one used by the legal system for the wronged party, applicants should demonstrate their understanding of and respect for the resiliency and perseverance of youth affected by CSEC.'

#### References

- **Agustin, L. M.** (2008), Sex at the Margins: Migration, Labour Markets and the Rescue Industry, London: Zed Books
- **Banyard, V. L. and Williams, L. M.** (2007), 'Women's voices on recovery: a multi-method study of the complexity of recovery from child sexual abuse', *Child Abuse and Neglect*, 31, 3, 275–90.
- **Barringer, C. E.** (1992), 'The survivor's voice: breaking the incest taboo', *National Women's Studies Association Journal*, 4, 1, 4–22.
- **Bittle, S.** (2002), 'When protection is punishment: neo-liberalism and secure care approaches to youth prostitution', *Canadian Journal of Criminology*, 44, 3, 317–50.
- **Briere, J.** (1997), 'An integrated approach to treating adults abused as children, with specific reference to self-reported recovered memories', in J. D. Read and D. S. Lindsay (eds.), *Recollections of Trauma*, New York: Plenum Press, pp. 25–41.
- Cooper, S. W., Estes, R. J., Giardino, A. P., Kellogg, N. D. and Vieth, V. I. (eds.) (2005), Medical, Legal, and Social Science Aspects of Child Sexual Exploitation: A Comprehensive Review of Pornography, Prostitution, and Internet Crimes, vols. 1 and 2, Saint Louis, MI: G.W. Medical Publishing.
- **Dalla, R. L.** (2002), 'Night moves: a qualitative investigation of street-level sex work', *Psychology of Women Quarterly*, 26, 1, 63–73.

- Estes, R. J. and Weiner, N. A. (2001), The Commercial Sexual Exploitation of Children in the US, Canada, and Mexico, Philadelphia, PA: University of Pennsylvania, Center for the Study of Youth Policy.
- Farley, M. (2004a), 'Prostitution is sexual violence', Psychiatric Times, special edition, pp. 7–10.
- Farley, M. (2004b), "Bad for the body, bad for the heart": prostitution harms women even if legalized or decriminalized', *Violence Against Women*, 10, 10, 1087–125.
- Farley, M., Baral, I., Kiremire, M. and Sezgin, U. (1998), 'Prostitution in five countries: violence and post-traumatic stress disorder', Feminism and Psychology, 8, 4, 405–26.
- Finkelhor, D. and Ormrod, R. (2004), Prostitution of Juveniles: Patterns from NIBRS Office of Juvenile Justice and Delinquency Prevention, US Department of Justice (June), 12 pages.
- **Friedman, S.** (2005), How the System Fails Sexually Exploited Girls in the United States: Examples from Four American Cities, Brooklyn, NY: ECPAT-USA.
- Goodman, L. A., Smyth, K. F., Borges, A. M. and Singer, R. (2009), 'When crises collide: how intimate partner violence and poverty intersect to shape women's mental health and coping'?, *Trauma, Violence and Abuse: Special Issue on the Mental Health Implications of Violence Against Women*, 10, 4, 306–329.
- **Halter, S.** (2007), 'Youth engaging in prostitution: the social construction of the child sexual abuse victim by law enforcement', paper presented at the annual meeting of the American Society of Criminology, Atlanta, Georgia, 14–17 November 2007.
- **Harvey, M.** (1996), 'An ecological view of psychological trauma and trauma recovery', *Journal of Traumatic Stress*, 9, 1, 3–23.
- **Luthar, S. S., Cicchetti, D. and Becker, B.** (2000), 'The construct of resilience: a critical evaluation and guidelines for future work', *Child Development*, 71, 3, 543–62.
- **Moore, M.** (2006), 'Should young people involved in the sex industry be seen as victims?', *Police Journal*, 79, 1, 77–89.
- Panter-Brick, C. (2002), 'Street children, human rights, and public health: a critique and future directions', *Annual Review of Anthropology*, 31, 147–71.
- **Priebe, A. and Suhr, C.** (2005), 'Hidden in plain view: the commercial sexual exploitation of girls in Atlanta', The Atlanta Women's Agenda, Atlanta, GA (September).
- **Raymond, J.** (1998), 'Prostitution as violence against women: NGO stonewalling in Beijing and elsewhere', *Women's Studies International Forum*, 1, 1, 1–9.
- Strauss, A. and Corbin, J. (1990), Basics of Qualitative Research: Grounded Theory Procedures and Techniques, Newbury Park, CA: Sage Publications.
- Sullivan, M. (2005), What Happens When Prostitution Becomes Work? Amherst, MA: Coalition Against Trafficking in Women.
- Williams, L. M. (2003), 'Understanding child abuse and violence against women: a life-course perspective', *Journal of Interpersonal Violence*, 18, 4, 441–51.
- Williams, L. M. (2009), 'Provide justice for prostituted teens: stop arresting and prosecuting girls', in Natasha A. Frost, Joshua D. Freilich and Todd R. Clear (eds.), Contemporary Issues in Criminal Justice Policy: Policy Proposals from the American Society of Criminology Conference, Belmont, CA: Cengage/Wadsworth, pp. 227–306.