



Resisting State Violence by Making Room for Police Officers' Benevolence: Canadian Indoor Sex Workers of Colour Share Their Experiences

Menaka Raguparan¹

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Abstract

Law enforcement's troubled interactions (characterised by unusually harsh, arbitrary, unjust, and racist interactions and attitudes) with minority and marginalised populations in Canada and other western countries are well documented. Against the backdrop of such scholarship, this paper attempts to make sense of alternative perceptions held by some sex workers of colour about police officers' attitudes or behaviours towards minority and marginalised communities. Using qualitative interview data, this paper explains how some sex workers of colour in Canada actively interpret the character of law and legality to negotiate power imbalances when interacting with police officers. The main aim here is to show how research participants produce a counter-narrative and a polarised image (instead of a fixed one) of police officers as simultaneously 'compassionate' and 'prejudiced' social control agents, bringing out the symbiotic tensions between such dichotomous characteristics.

Keywords Deference · Gender · Policing practices · Race · Resistance · Sex work

I feel super empowered to be in a situation where there are police officers because I don't feel like I am going to get harassed by them, for the most part [...]. I think that police who are going to come after you have, like, this 'save her' mentality, right [participant emphasis]. I think that they would be very patronising in terms of the, like, "you think you are doing such a good thing, but it's going to come back and bite you, and you are going to get into trouble", and like, "if only you knew. You are so young and naive" [participant emphasis]. I think they would be very, like, "Oh sweetie", like, "you think you know [what you are doing], but you don't" [participant emphasis]. I don't think that, in general, they would have an incentive

✉ Menaka Raguparan
raguparanm@uncw.edu

¹ Department of Sociology and Criminology, University of North Carolina at Wilmington, Wilmington, USA

to harm me. But I'm also articulate, able to stand up for myself, fairly assertive, attractive, and I don't come off as somebody who's marginalised. So, I think they'd want to help me and be more compassionate.

[Serena – Black Canadian independent sex worker]

In the quotation above, Serena, a Black Canadian independent sex worker, explains that her past interactions have led her to believe that law enforcement officers, although patronising, are compassionate people who imagine themselves to be saving sex workers from the harms of prostitution. To scholars familiar with existing literature, this view is perhaps counterintuitive, as Canadian police officers' adverse interactions with minority and other marginalised communities are well documented (see Hodgson 2001; Wortley 2006; Chu and Huey-Long Song 2008; Wortley and Owusu-Bempah 2009; Comack 2012; Maynard 2017; Ayoyo 2018; Bundy 2019). However, within this scholarship, police officers' attitudes or behaviours towards minority and marginalised communities are seldom described using words like 'compassionate' or 'empowered'. Instead, existing literature in this area regarding Canada and other western countries highlights law enforcement's unusually harsh, arbitrary, unjust, and racist interactions and attitudes towards minority and marginalised populations (see Johnson 2004; Egharevba 2006; Taylor et al. 2009; Brunson and Gau 2011; Ritchie 2017; Clevinger et al. 2018; De Soto 2018).

Against existing scholarship about police and their troubled interactions with minority and marginalised communities, how might we make sense of Serena's impressions of police officers in Canada? My primary aim in this essay is to explain how some sex workers of colour in Canada actively interpret the character of law and legality to negotiate power imbalances when interacting with police officers. I argue that my research participants' interpretations of police officers' characters produce a counter-narrative and a polarised image (instead of a fixed one) of police officers as simultaneously 'compassionate' and 'prejudiced' social control agents, bringing out the symbiotic tensions between such dichotomous characteristics.

Ewick and Silbey's analysis of *legal consciousness* provides a framework to understand how sex workers of colour form very different perceptions about the characters of justice, law, and law enforcers. Ewick and Silbey (1998) recognise that legality is not merely a structural feature of society but is also shaped by social relations continually produced, invoked, and deployed by individual and group actors. The process of constructing legality, Ewick and Silbey argue, is constituted through (1) everyday practice, which "consists of cultural schemas and resources that operate to define and pattern social life", (2) "repeated invocations of the law and legal concepts and terminology", and (3) "imaginative and unusual associations between legality and other social structures" (1998, 43). In this sense, legal consciousness becomes a cultural practice whereby individuals participate in the construction of social relations.

Therefore, drawing upon the experiences of a subset of Canadian sex workers of colour who participated in a more extensive study, I highlight non-competitive

forms of resistance that shape the overall balance of power and social inequality at the intersections of race, gender, class, citizenship, and sexual conduct. Research participants in this study do not perceive the law as an autonomous, static, and sacred force, but instead draw attention to how legality is formed through social relations. This process is evident as we examine sex workers of colour's interpretations and legitimisations of police officers' attitudes and biases towards marginalised people. Ewick and Silbey (1998, 40–41) argue that investing in power-generating capacity requires cultural schema and resources. Although my participants' enactments of cultural schemas reproduce and maintain traditional notions of police structural powers, these women's capabilities to invoke "schemas in a wide variety of settings" allow for "new resources and thus the ability to change or revise cultural meanings and the distribution of resources" (Ewick and Silbey 1998, 41). At this juncture, Ewick and Silbey's definition of 'resources' and how they can be operationalised is noteworthy: resources include both material assets (such as capital and property) and human capacity (such as legal knowledge, citizenship, looks and accents, and class markers (1998, 40–41).

Though not representative of marginalised experiences with law enforcement, the participant stories featured in this essay reflect substantial efforts to subvert harmful policing practices. The historic infantilisation and/or dehumanisation of marginalised populations have often resulted in erasing lived realities that are counterintuitive to normative portrayals of vulnerability and victimisation. Thus, as members of a marginalised group vulnerable to everyday micro-discriminations arising from the intersections of race and sex work, study participants have valuable resistance strategies to share. The detailed accounts of sex worker–police officer interactions here expose Canadian law enforcement's arbitrary and autocratic use of authority and construct an alternative and more agentic view of female sex workers of colour. Furthermore, these stories invest in participants' senses of intention and purpose by keeping their intelligence, wit, and charm intact. In other words, my research participants, as subordinate individuals, may appear to be following normative social and cultural repertoires of everyday life. However, their successful strategies of subversion involve not only disagreeing with normative ideologies but also keeping the effects of their actions out of sight of those in power. Such small-scale strategies of resistance, while effective, do have their limitations. Therefore, exploring these limits also makes meaningful contributions to studies of resistance.

In the remainder of this essay, I draw on participant interviews to articulate how sex workers of colour use schemas, cultural codes, and scripts that mainly draw on classed, raced, and citizenship-based performances of sexual, gender, and legal propriety. In enacting legal consciousness, my participants reported juxtaposing these performances against dominant controlling narratives of racialised hypersexuality and the incorrigibility of women incapable of adopting normative femininity to garner sympathy and respect and to mitigate or avoid negative legal ramifications. Thus, I first explore the extent to which my research participants' actions/strategies of subversion are intentionally determined and are believed to be effective. Secondly, I examine whether my participants' strategies of resistance can disrupt the status quo. Finally, borrowing from Bosworth and Carrabine (2001), I argue that such questions open up the opportunity to make the idea of resistance

more subtle and accurate and to understand the implications of socio-cultural identities in this process.

Interactions with Law Enforcement: The Canadian Context for Marginalised Communities

Given the long history of police-inflicted violence upon them—which includes practices such as racial profiling, over-policing, under-protection, and abuses of power (see Hodgson 2001; Wortley 2006; Wortley and Owusu-Bempah 2009; Comack 2012; Maynard 2017)—marginalised communities in Canada seldom trust the police to protect them and often avoid interacting with law enforcement at all costs. Studies show that communities of colour strongly believe that the racial biases and attitudes of police officers lead to their differential treatment in encounters with law enforcers (Wortley 1996; Chu and Huey-Long Song 2008; Chow 2012; Owusu-Bempah 2016; Maynard 2017; Ayoyo 2018). Many scholars and activists have argued that such a lack of confidence in law enforcement affects the legitimacy of the entire policing institution (Cao 2011, 2014; Sprott and Doob 2014; Benoit et al. 2016; Alberton et al. 2019).

Anti-racist activists and scholars such as Razack (2002) and Maynard (2017), who have examined Black and Indigenous women's experiences with police officers, argue that contemporary policing patterns and paradigms in Canada are shaped by the continuing operation of controlling images (see Collins 1999) of Black and Indigenous women that are rooted in colonialism and slavery. The continuing operation of these images is further reinforced by scholars focusing on female sex workers' interactions with police officers. For example, it is well documented that law enforcers who imagine themselves to be benevolent protectors and rescuers use gendered and racialised stereotypes to determine who is a plausible or believable 'victim' (Soderlund 2005; O'Brien et al. 2013; Balgamwalla 2016). In this sense, "[w]omen coming from Asian countries are often characterised as being very passive, very innocent, sweet village girls who do not know any better" (Brock et al. 2000, 6), while "Asian women who do sex work are still perceived to be the default trafficking victim regardless of their citizenship status or length of time in the country" (Kempadoo et al. 2017, 10). The consequences of such controlling images of Asian sex workers and misguided attempts to rescue them, according to Kaye (2017), naturalise "structural violence against gendered and racialised bodies" (40). In other words, Canadian sex work scholars argue that policing practices and protocols normalise any violence sex workers experience as an inherent part of their 'risky' occupation, thereby justifying the lack of state protection for this population (Krusi et al. 2016). Such policing practices and protocols not only make life difficult for sex workers, irrespective of their guilt, but they also lead to sex workers lacking trust and confidence in individual police officers (Bruckert and Hannem 2013; also see Dewey and St. Germain 2014; Sherman et al. 2015 Benoit et al. 2016).

Sex Work-Related Laws in Canada and Their Impacts

Current sex work-related laws in Canada are defined under the Protection of Communities and Exploited Persons Act (PCEPA) 2014, which does not criminalise the sale of sex but does criminalise the purchase of sex and other sex work-related activities, including solicitation and third-party involvement. The current study was conducted during a law reform process; as such, except for one participant, all participants' shared interactions with police officers occurred before PCEPA. Before the law changed, prostitution was a quasi-criminal offence, such that engaging in prostitution itself was not illegal, but that other prostitution-related actions—including solicitation for the purpose of prostitution and living off the avails of prostitution—were illegal.

In this essay, I do not compare the effects of the old and new sex work-related laws in Canada. Instead, given the disparities between the law in books and the law in action (see Pound 1910), I seek to understand how my research participants perceive the character of the law and legality. Informed by their personal and vicarious experiences of everyday racism (Essed 1990) and the resultant dehumanising policing practices they have encountered, research participants in this study expressed a belief that police officers will not change their attitudes and behaviours towards people of colour or sex workers. Given such convictions, my participants' small-scale strategies of resistance when interacting with police officers are of interest. In this regard, this study, for which data were collected in 2014–2015, remains relevant. In other words, despite the changes in the law, police officers' attitudes towards sex workers in general, and sex workers of colour in particular, have not changed significantly (Lam 2016; McBride et al. 2020; Crago et al. 2021).

Method

The qualitative interviews used in this article are part of a larger project conducted between August 2014 and April 2015, in which I asked a broad question: How do women of colour and Indigenous women experience the indoor sectors of the Canadian sex industry? To answer this question, I interviewed forty sex workers of colour from nine different cities in Canada (Vancouver, Calgary, Saskatoon, Niagara Falls, Toronto, Kingston, Ottawa, Montreal, and Halifax). Sex workers who self-identified as belonging to a racialised or Indigenous group and as currently or formerly engaged in the indoor sectors of the Canadian sex industry were included. Before the interviews, participants were informed of the study's objectives and were assured that participation was voluntary and that their identities would be kept confidential. Upon completing a written consent form, all participants participated in one interview session. Participants received a cash honorarium of CAD 75.00 for their time and knowledge. This research received ethics approval from Carleton University Research Ethics Board and was vouched for by four different sex workers' rights organisations (SWROs) in Canada.

Participants in this study were recruited using a purposive snowball sampling strategy. Three separate recruitment sources were used to start the snowball: First, I posted the call for participants on several Canadian SWROs' Facebook pages. Second, I used my social and academic networks. Third, I directly contacted sex workers who identified as belonging to a racialised group and advertised their services on third-party sites such as Backpage.com, Eros.com, and Redzone.com. I also carried out internet searches for sex workers' websites and contacted some there. The resulting semi-structured in-depth interviews, which featured a series of open-ended questions, ranged from 40 minutes to two and a half hours. With participants' permission, all conversations were recorded and transcribed for analysis. All interviews were transcribed verbatim and uploaded into NVivo 10 for analysis. Through three stages of inductive coding, the data were organised and separated into different themes that arose throughout the interviews: Stage one used descriptive coding to obtain a broad sense of the primary themes of the interviews (parent nodes); stage two produced two levels of sub-codes (child and grandchild nodes) to narrow down these broad descriptive codes; and stage three involved reorganising the codes into main themes for discussion.

Participant Demography

Of my participants, thirty-eight individuals identified as cis women; two identified as gender non-binary and worked as women in the sex industry. To maintain confidentiality, I have avoided pronoun use or have used female pronouns in reference to all participants in this study. Except for one participant who held a student visa, all participants identified as Canadian citizens or permanent residents. Participants self-identified as belonging to the following racial groups: Arab (2), Indigenous (3), East Asian (4), South Asian (6), Black (13), and mixed-race (12). The inclusion of Indigenous and a broad range of other women of colour marks the first empirical study of its kind in Canada. Further, research participants in this study have worked in various sectors within the Canadian sex industry, such as independent in-call/out-call sectors, escort agencies, massage parlours, strip clubs, and online sectors such as pornography and webcam work. The inclusion of participants from diverse Canadian sex markets also contributes to the uniqueness of this study.

Twenty-four of the forty participants in this study reported having had interactions with police officers. Consistent with existing literature, most participants ($n=15$) reported adversarial encounters with police officers, which included massage parlour and hotel room raids and arrests on charges of loitering, public nuisance, and soliciting for the purpose of prostitution (see Raguparan 2020). The remaining participants in this study ($n=9$) reported positive experiences; these nine cases are examined below. It is important to note that the nine participants featured in this essay are all Canadian citizens. Given that sex workers of colour are in a relatively weak social position, focusing on this subset of participants, whose subjectivity occupies shifting positions as they straddle multiple marginalisations and 'partial

privilege' (Hutchinson 2001; Mutua 2013) in their various interactions, not only provides an opportunity to celebrate their ability to negotiate power imbalances but also places issues of power at the centre of understanding.

Performing Culturalised Schemas

Research participants featured in this essay reported drawing on the same stereotypical assumptions, cultural codes, and normative controlling images that police officers frequently use to justify their violence towards sex workers and people of colour.¹ Collins' (1999) discussion of *controlling images* (or *controlling narratives*) plays a crucial role in understanding research participants' interactions with police officers. The notion of controlling images/narratives highlights how negative representations of Black womanhood/femininity—constructed as binary opposites through the figures of the 'mammy' and the 'Jezebel' or 'Sapphire'—continue to oppress Black women. The concept of controlling images/narratives can be used to understand socially constructed stereotypes of other women of colour and Indigenous women. Women of colour and Indigenous women have long been narrativised as inherently and pathologically sexually deviant and have thus been classified as promiscuous and willing participants in prostitution. This narrative has repeatedly been used to justify relationships of superiority and inferiority, including race, gender, and class-based hierarchies and oppressions (see Collins 1999; Ritchie 2017).

It is clear from the interview data that the strategic performance of controlling images has minimised adverse outcomes for participants. Participants legitimising police officers' assumptions about sex workers of colour and performing deference, in turn, reinforced police officers' positional authority and minimised or avoided legal conflict (Lanza-Kaduce and Greenleaf 2000). Positioning themselves as part of an unrespectable class—thereby enhancing their public performance of deference to primarily White, mostly male police officers—allowed all nine participants examined here to avoid police harassment. In the quotation below, Kumari, a second-generation Canadian and an independent escort, explains how she has used her visible looks of 'Indian' to normalise both her social role as a member of a subordinate community and the police officer's social role as a dominant elite:

I will say that as a woman that looks Indian, [...] When the police stop me, if I tell them I have to be home, my parents are going to beat me, they used to let

¹ Within Ewick and Silbey's (1998) framework, schemas "include cultural codes, vocabularies of motive, logics, hierarchies of value, and conventions, as well as the binary oppositions that make up [...] a society's 'fundamental tools of thought'" (40) [original emphasis]. Ewick and Silbey (1998) suggest that "it is on the basis of the enactment of these symbolic constructs that social action is largely (although not entirely) premised, and it is through the invocation or application of these schemas in particular settings and interactions that we actively make, as we make sense of, the world" (40). In other words, schemas provide us with images, resources, and opportunities for how we should think and act in society. The cultural codes and binary oppositions that are used as tools of thought to classify people of colour in our society are what Collins (1999) refers to as controlling images/narratives.

me go. [...] They buy into those stereotypes that Indian families are very strict, [...] you know. They would buy into that, and that's the kind of tricks that I used to stay away from the police. I used stereotypes to my advantage.

Even as she utilises her 'Indian' looks and cultural codes of patriarchy, Kumari capitalises on her Canadian citizenship through her ability to speak English fluently and without an accent. In this regard, her intersectional identities are resources and opportunities for constructing a particular image of herself to facilitate a non-adversarial interaction with the police officers. Moreover, Kumari's experiences here emphasise the fluidity of social status and draw attention to her concurrent positions as a multiply marginalised and partially privileged individual.

The following excerpt from Saskia further exemplifies the creative use of culturalised codes to avoid adverse outcomes with police officers. Saskia is a mixed-race (Black and White), light-skinned Canadian who successfully passes as White in her everyday life. This participant's tenure in the sex industry is diverse and includes occasional work in the street-based sector of a downtown area in a large city. Saskia shared that she used to have a drug habit and was known to police as a street-based survival sex worker. Despite this, Saskia reports never being subjected to discriminatory or harsh policing practices. According to her, she has only ever been scolded for being 'out of place' (see Cresswell 1996) as a drug user and not for her status as a sex worker. Saskia explains:

I have been stopped a lot by cops. Because of my drug problem, usually if you get caught, or if I am out somewhere, [police ask] "what you doing here?" I am like, "I'm a hooker." They're like, "oh ok, don't worry about her, she got a reason [to be here]" you know what I mean. [...] I solicited a cop accidentally one night while I was walking. And he told me that day [...] that [local] police were not focusing on the [sex] workers, they weren't really concerned with us as breaking laws as a whole, that it was the pimps and the johns that they wanted and more specifically they wanted the gay-for-pays over us. I don't really get hassled. I never ever had a cop like call me up off Backpage and come to my hotel room. I have never had the hotel call the cops on me. [...] I mean, I am not really worried about getting arrested because I know if they do, it's going to be more hassle, more money out for them because I will be released on bond, and they probably won't even bring up a charge, it wouldn't, it wouldn't fly, you know.

It is evident that Saskia's legal consciousness—namely, her perception of sex work-related laws and how they are enforced in the city where she works—is informed by her past interactions with police officers. The information she receives from the police is further supported by her lived experience as a White-passing sex worker. All 40 participants in this study discussed the arbitrary enforcement of sex work-related laws, such that even though sex work-related activities are federally regulated, each province and each municipality exercise discretion regarding the extent to which they choose to enforce the same. Devi, a first-generation South Asian-Canadian independent out-call worker who reported positive interactions with officers, stated, "I know Vancouver is a really good place to be working because

VPD [Vancouver Police Department] has a non-enforcement type thing going on, unless someone's, like, directly harmed or being trafficked or being pimped."

In addition to capitalising on arbitrary enforcement practices, Saskia also draws on her light skin and her 'Whitewashed' position (which she uses to pass as White in her everyday life) as leverage for negotiating her identity and positionality:

I identify myself as White. Yeah, I was raised by the White side of my family versus the coloured side, and I am definitely Whitewashed. [chuckles] I totally am, [...] I pride myself on that. If being educated and speak well means I am White, ok, I will take it, you know, sadly enough, I'll take it. I love that I am mixed. I love that I came out White-looking [chuckles]. [...] Externally, look-wise [...] a lot of people look at me, and like "You're not an intravenous user, you have all your fucking teeth" [laughing]. Yes, I do. That's from the White side doing my dental work, you know [...] I'm not unhappy to say that I'm mixed [...], there's a lot more positive reinforcement towards being White in any way, shape, or form.

No doubt, Saskia's perceptions and social relations have shaped her decision to embody the cultural codes of the dominant elite and perform the White, irrational, naive, drug-using survival sex worker in public (see Scott 1990). Even though such performances reinforce widespread stereotypes that are entrenched in public discourse and law enforcement policies, embodying the image of the 'Whitewashed' respectable woman around police officers is less threatening than revelling in her identity as a Black survival sex worker, and therefore allows her to easily appeal to police officers' sympathies. Police officers' compassion is also drawn out by Saskia's markers of respectability and passivity. In other words, police officers' sympathy and compassion towards Saskia can also be framed within the invisible privileges of approximating Whiteness (Mahoney 1997; Twine and Gardener 2013). Ultimately, this sex worker's public actions and behaviours become cultural currency to mitigate some of the negative consequences of her position as a street-based, survival sex worker. In this regard, Saskia's interpretations of legal practices and law enforcement are shaped by culturally variable ideologies. James Scott's (1990) concept of 'public' and 'hidden' transcripts rounds the discussion by charting a path to recognise the unconventional use of cultural codes/schemas and controlling narratives as legitimate forms of resistance. Public transcripts, Scott (1990) claims, are the public performance of deference and loyalty that is an important element of power relations, and hidden transcripts as a form of resistance whereby subordinate individuals and groups keep their dissenting views and perceptions a secret to protect their safety in the face of powerful entities.²

² James Scott (1990) defines the public transcript as a symbolic display and "the self-portrait of dominant elites as they would have themselves seen" (18). In order to establish and maintain the power of dominant elites, subordinate individuals and groups are forced to behave and speak in prescribed roles and languages that enable "a veiled discourse of dignity and self-assertion [...] in which ideological resistance is disguised, muted and veiled for safety's sake" (Scott 1990, 137). Public transcripts, by design, enable an impressive, lopsided, flattering self-portrait of the dominant elites, but they also make room for symbolic force among subordinate groups through the "politics of disguise and anonymity that takes place in public view" (Scott 1990, 19). Designed to have a double meaning or to shield the identity of the actors, interactions within public transcripts require little coordination or planning and are used by

The nine participants featured in this essay are not the only ones who reported strategically using stereotypes in their interactions with police officers. Employing symbolic constructions of cultural schemas to achieve goals is a widespread practice reported by all 40 study participants. Participants explained that they strategically negotiated their marginalised and stratified positions to compete within the marketplace (see Raguparan 2017, 2019; also see O’Connell Davidson 1995). Transposing these marketplace strategies onto interactions with law enforcement is a means to convert unconventional actions into common and familiar practices. In doing so, Ewick and Silbey (1998) would argue that my research participants have attached a degree of legitimacy and appropriateness to the enactment/embodiment of unconventional actions and behaviours. The ability of sex workers of colour to rework stereotypes in multiple scenarios “opens up the potential for generating new resources and thus the ability to challenge or revise cultural meanings and the distribution of resources” (Ewick and Silbey 1998, 41).

It is important to note that the participant strategies discussed in this essay differ from stigma management, since these women are known to police as sex workers. Thus, these participants were not trying to mitigate the effects of sex worker stigma through common management techniques such as code-switching, living double lives, passing, and performing respectable feminine identities (see Raguparan 2018). Instead, the interactions featured in this essay draw attention to minor forms of resistance from sex workers of colour to avoid harassment or arrest. Especially when considering the dehumanising policing practices and policies that sex workers of colour regularly endure, their thoughtfully calculated embodiment of controlling images can be reinterpreted as practical tools for negotiating power.

Still, the limitations of such strategic performances cannot be ignored. Though they may protect sex workers in their interactions with police officers, these strategies also risk deepening police officers’ racial biases against sex workers and reifying negative images of racialised femininity and sexuality. Rather than resulting in revolutionary social change, such performances of controlling images offer the conditions for state authorities to continue justifying their benevolent approaches when responding to the prostitution ‘problem’.

Relying on Controlling Images and Narratives

Dating back to the White slave trade panic of the nineteenth and early twentieth centuries, women’s engagement in the sex industry has been classified through dichotomous constructions of the blameless ‘involuntary prostitute’—i.e. a good vulnerable victim who deserves state protection and is worthy of being rescued—and

Footnote 2 (continued)

both the dominant and the subordinate to normalise particular social roles. Focusing on offstage actions and discourse (i.e. those outside of the intimidating gaze of elites and structural authorities), Scott (1990) notes that subordinate individuals, when in public view, use their hidden transcripts to follow normative social and cultural repertoires of everyday life without agreeing to their underpinning ideologies. The hidden transcript thus accounts for ideological disagreement and frames it as a political act.

the ‘voluntary sinful deviant prostitute’—i.e. an undeserving victim who is responsible for their victimisation and is thus barred from accessing state protections (Doezema 2000; Valverde 2008; O’Connell Davidson 2010; Balgamwalla 2016, 28; Faulkner 2018). Overwhelmingly, sex workers of colour and Indigenous sex workers are perceived by police officers as voluntary prostitutes who do not meet the threshold for state protection (Hunt 2015; Maynard 2015; Krusi et al. 2016). Evidence also shows that police officers’ perceptions of sex workers of colour are further amplified by the controlling narratives of hypersexuality and deviance (Maynard 2017; Ritchie 2017; Ritchie and Jones-Brown 2017). However, in this study, some sex workers of colour have been classified as blameless involuntary prostitutes who deserve to be saved by police officers. According to these women, officers’ behaviours towards them appear to reflect a belief that their participation in the sex industry must be an act of naiveté, ignorance, and/or, at times, a sign of helpless racial inferiority.

For instance, participant Kalinda, a White-passing mixed-race (Indigenous and White) Canadian massage parlour worker, has had several encounters with law enforcement in her capacity as a sex worker.³ Kalinda told me that in her interactions with police officers, she has always been perceived as a naive woman who has no idea what she has gotten herself into; she has surmised this from their attitudes, which reflect that it is their job to advise her of what is suitable for her. Kalinda’s public transcript/response to her interpretation of police officers’ attitudes involves strategically reinforcing police officers’ positional authority and her deference to minimise conflict and avoid adverse outcomes (Lanza-Kaduce and Greenleaf 2000; see Scott 1990). Although this participant is satisfied that her public behaviour when interacting with police officers has allowed her to avoid harsh or aggressive policing, her hidden transcript/reaction to the unsolicited advice is at odds with her public transcript. According to Kalinda, she feels irritated by the protectionist sentiments of patronising and narrow-minded officers. Regardless, she felt she must play along with the dominant narrative to sustain the police officers’ sense of benevolence for the sake of her safety:

In my experiences, it’s very much always been like, “Oh, do your parents know what you do?” “What would your parents feel if you told them?” “Do you ever think this will make it hard for you to meet a good man later on?” [...] It’s kind of a similar thing [every time]; they give us a lecture on, like, our futures. [...]. Ugh! It’s the assumptions that bothered me, like [...] the assumption that my parents don’t know and aren’t proud of me [...]. With my co-workers who aren’t White, there tends to be much more assumption of, like, their status as victims or as criminals. The questions seem to be about like how they got to Canada, whether they were trafficked or if they use drugs or if

³ Like Saskia, Kalinda is also light-skinned. To pass as White, Kalinda colours her hair and has surgically altered her nose to resemble White features.

they are pimped or whatever else. [...] Where with me, I'm a bit sassy, I'm in college, so [police officers] tend to assume that I am gonna quit this and have a 'normal life' [participant emphasis] [...], rarely any kind of an assumption of there being a pimp involved. I think it's a disappointment to them [police officers] every time they come in, and I'm still there [laughing] [...]. Once I was asked, "Who got you into this?" and I laughed and said, "Google" [laughing] [participant emphasis].

Kalinda's symbolic display of deference to White male police officers in public also includes performing blameless, naive sex worker. In the excerpt below, Kalinda explains further how her public displays are informed by her community experiences of state violence:

You grow up hearing from one side of the family like the police are there to help you, if you are lost, go to the police and this and that. And then, from my other side of the family, they have not had [chuckles] such a good history with the law. I mean, my dad was taken away when he was two months old, his mother was incarcerated at the time of his birth [...] It sucks to be in a position where you suddenly realise that sometimes [...] it doesn't matter how polite you are, dealing with the police is a risk, and it sucks. I'm more afraid that it would get physical. Like, I already have this really weird awareness. It's like, four guys come in with guns, no women with them [...] You are very aware that they can do whatever they want, they can hurt you, they can rape you, they can shoot you, and probably no one would care. Probably no one will question it. It's like, it's four officers of the law against one hooker or two hookers or three hookers, you know. [...] You just get very aware of the power imbalance, and you just think how much worse it would be. I think it would be a lot more likely to get physical.

It is evident from this sex worker's experience that her interpretation of the law and legality's legitimacy is shaped by her vicarious knowledge of state violence. This police–sex worker interaction also brings to light the play of power in strategies of subversion. Thus, Kalinda's public display of deference—this small-scale resistance strategy—also emphasises how public and hidden transcripts are effective tools for contesting and negotiating structural imbalances between dominant and subordinate groups (Scott 1990). While Kalinda's intersectional identities are resources for power-generating capacity or resistance, the contradictions between Kalinda's White and Indigenous families' perceptions of police bring out the symbolic tensions between images of police as alternately 'benevolent' and 'prejudiced'. Such contradictions and tensions reflect the multiplicity of law, legality, and legal character. Here, it is essential to note that, like Saskia, Kalinda also capitalises on her (in)visible White privileges. However, unlike Kumari (South Asian Canadian), Kalinda does not straddle her multiple identities as a mixed-race (Indigenous and White) Canadian in her public interactions with police officers. As Kalinda points out, by revealing her indigeneity, she risks experiencing police-inflected state violence (Raguparan 2020).

Appropriating the Image of Involuntary Sex Worker

As two White-passing sex workers, Saskia's and Kalinda's encounters with benevolent police officers may not be surprising. However, some Black participants also said that they could avoid discriminatory policing if, in their public interactions, they legitimised police officers' senses and images of themselves as benevolent protectors of naive sex workers. Serena, whose experience opened this essay, is one such example. Reading police officers' attitudes and behavioural cues, legitimising their assumptions, and showing them respect are all strategies that White street-based sex workers also use to avoid arrest (see Sanders 2004; Dewey and St. Germain 2014). Below, I draw attention to another participant, Lola, a Black Canadian escort agency worker, who also interprets police officers' behavioural cues to mitigate potential harm:

So far, I have yet to experience the problem, and I don't know if this comes back to our earlier conversation about appearing less threatening. Still, I have always, always had completely positive interactions with police. [...] Maybe that comes down to the fact that you know, I'm a little manipulative, I'm kinda charming, I know how to work people. That's the other flip side of me being able to read people and see what they need. I can also, [pause] what's the word, manoeuvre them as I need to, and I just believe in my confidence too. If situations were to come up, to sell my innocence, and to ask the right questions without appearing to be snarky while being incredibly snarky, [...] like, every situation is what you make of it.

In this quotation, Lola articulates how she uses her personality to enhance her innocence convincingly. In performing the 'innocent' prostitute, Lola distracts police officers from forming an impression of the 'threatening Black woman'. In doing so, this participant converts her personality traits into resources for power-generating capacity. It is important to recognise that, like most research participants, Lola's hidden transcript is also vastly different from her public display of deference. Lola notes, "I'm completely against police brutality. It is a problem; we are seeing it ripple throughout America right now, and this has been happening forever. It's just getting to the point where we can't ignore it anymore." Despite such a strong understanding of systemic issues, Lola's ability to set aside her emotions and carry out a calm and patient temperament is a testament to her carefully determined strategies of resistance.

Furthermore, Lola works for a high-end escort agency in a large metropolitan city that operates like a modelling agency in the sense that they "do the screening for me and arrange the driver and handle all the reception aspects of it. [...] [Also,] they have someone whom we work with, so we can file our taxes." Critical sex work scholars have classified some of the indoor sectors of the sex industry, such as escort agencies, gentlemen's clubs, and private referrals, as part of an 'upscale' or 'bourgeois' sector, which economically privileged clients frequent; as such, only women who are or may pass as middle-class are hired to work in these establishments (Bernstein 2007; Mahdavi 2013). Participants in this study pointed out that they often performed middle-classness to be employed in these high-end

agencies (Raguparan 2019). Lola explained how she applies her ability to perform middle-classness with her employer and clients to her interactions with police officers. Such innovative actions then allow her to shift her perceived position on the respectability hierarchy and enhance her performance of the innocent prostitute trope.

To a great extent, her access to these differential resources disrupts the stereotypical image of the ‘angry Black woman’ and makes her appear ‘less threatening’, allowing her to gain some respect from police officers and mitigate harm. In this sense, Lola’s dual operation of schemas (i.e. the strategic use of one controlling image to reduce the damage of another) and resources (i.e. her personality, her citizenship, and her class markers—capital she gains from working for a high-end escort agency and her performance of middle-classness) underwrites her social power and agency. However, here we also see how Lola’s power-generating schemas and resources emphasise the fluidity of her social status, highlighting her concurrent position as a multiply marginalised and partially privileged individual. Furthermore, while the White-passing participants reported invoking their racial privileges, Lola focused on leveraging her class markers.

Black sex workers are not the only women to appropriate the trope of ‘innocent prostitute’ by enhancing their naiveté and capitalising on the assumptions of law enforcers. Other sex workers of colour in this study also adopted this approach by appropriating the ‘ignorant immigrant’ trope to avoid discriminatory policing practices. Asha, a mixed-race (East Asian and Black) second-generation Canadian who is a single mother with a darker skin tone, exemplifies this well. This participant has also had multiple encounters with police in her capacity as a sex worker. On each occasion, Asha explained, she cycled through her multiple identities—an indoor sex worker, an ‘Asian-looking’ sex worker, and a vulnerable single mother—to minimise adverse outcomes:

When I worked in [city name], I actually had somebody call me to a hotel, and when I got there, there was a man and a woman, and they were police officers, and they just wanted to know if I was being harmed or if I was doing it on my own free will. I was so scared, believe me, my heart was pounding [laughing] [...]. Oh, they were great, they were really nice. I explained to them that I’m independent and that I’m a dancer, and I just provide companionship for money, like, to help pay my bills and stuff and to take care of my son. They were really nice; they just wanted to know if I was being pimped.

In the account above, Asha describes an incident in which she encountered two police officers who were impersonating clients. Despite being caught off guard and feeling very nervous, Asha’s capacity to think and act under pressure without becoming flustered highlights her ability to take control of the situation. For Asha, her Canadian citizenship (an invisible privilege) also enhances her sense of control and safety, which many Asian immigrants in Canada lack because of their exposure to state violence at the convergence of criminal and immigration laws (Kaye et al. 2019). According to Asha, police officers usually profile her as a naive immigrant woman who is uninformed about the dangers of the sex industry. In other words, her Asian looks give way to the impression that she could be a victim of sex trafficking.

Therefore, using her ability to speak English fluently without an accent and her credentials as an independent escort, Asha has convincingly conveyed that she is not a 'victim of exploitation' or a victim of trafficking. Further, she capitalises on law enforcement's general tolerance towards high-end, independent escorts in efforts to mitigate negative interactions (Scambler 2007; Sanders and Soothill 2011). Finally, Asha combines her hyper-feminine looks and embodiment to solidify the image of the gentle, passive, ignorant immigrant.

Asha's command of her emotions, patience, and non-confrontational demeanour allows her to invoke police officers' sympathies. In this regard, Asha's favourable perception of police officers is shaped by her past positive interactions with law enforcement and is consistent with existing literature that points to marginally positive views of police by Chinese Canadians (Wortley 1996; Chu and Huey-Long Song 2008; Chow 2012). Interestingly, all nine women featured in this essay said that they were comfortable reaching out to police officers or that they had reached out for police protection when needed. These participants' perceptions, then, form a counter/alternative narrative to the majority of existing literature on sex workers' interactions with police officers—a body of work that suggests many sex workers feel that seeking police protection will only make a bad situation worse (Bruckert and Hannem 2013; Krusi et al. 2016).

Conclusions

The tension between marginalised populations, the criminal justice system, and law enforcement is a well-known phenomenon. While the Canadian context has received less widespread attention than other nation-states such as the United States, the situation in Canada cannot be ignored. The differential and discriminatory policing practices to which sex workers of colour in Canada are subjected lead to another interpretation of police officers' behaviours and actions towards sex workers of colour. Therefore, in this article, I have analysed why some research participants expressed a perception of police officers that differs from most other sex workers and people of colour in Canada. The close examination of research participants' experiences and views of police officers featured in this essay can be understood as a counter-view or another interpretation of police officers' characters. From a legal consciousness perspective, understanding the multiple and contradictory interpretations of police officers and their role as law enforcers is necessary to (1) endorse the power of law and legality as a structure of legal action and (2) to "make resistance, or counter-hegemonic accounts of legality, possible" (Ewick and Silbey 1998, 31). In this regard, unpacking research participants' atypical perceptions of law enforcers shed light on how people interpret the law and the different ways and resources used to resist the power of law/legality in everyday life.

Most research participants in this broader study have had negative interactions with police officers. These interactions, without a doubt, have been shaped by their races and statuses as sex workers. The research participants I feature in this article expressed being acutely aware of the widespread differential and discriminatory interactions between police officers and various marginalised groups, including sex

workers and people of colour. Despite such knowledge, these women were confident that they could continue to avoid adverse outcomes when interacting with law enforcers in Canada. My participants' confidence and success have depended on their ability to continuously shift their subjective positions between their multiple marginalities (e.g. experienced through their race and sex working status), their partial privilege (e.g. their status as indoor rather than street-based sex workers), their education levels, their abilities to earn an income higher-than-minimum wage), and their performances of race and class markers. The confidence my participants espouse is noteworthy because it is one of the many findings that allows me to highlight these women's agency and develop a counter-narrative to the normative controlling image/narrative of sex workers of colour as unfortunate, senseless victims.

It is true that research participants' strategic performances of hyper-femininity and naiveté, to some extent, reinforce police officers' normative impressions and mainstream assumptions about sex workers. If we pay careful attention to the nuances in these women's strategies, the image of active, reasoning agents becomes clear. Therefore, on the one hand, participants reproduce negative controlling images and participate in sustaining the structure of policing. Still, on the other hand, they use these stereotypes to their advantage as innovative acts of resistance. By repeating these repertoires of resistance in different settings, including in the marketplace and when interacting with police officers, these women legitimise unconventional practices that ultimately become part of social relations and interactions.

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