

This article was downloaded by: [FU Berlin]

On: 24 September 2013, At: 04:32

Publisher: Routledge

Informa Ltd Registered in England and Wales Registered Number: 1072954 Registered office: Mortimer House, 37-41 Mortimer Street, London W1T 3JH, UK



Global Society

Publication details, including instructions for authors and subscription information:

<http://www.tandfonline.com/loi/cgsj20>

The Ambivalence of Advocacy: Representation and Contestation in Global NGO Advocacy for Child Workers and Sex Workers

Kristina Hahn & Anna Holzscheiter

Published online: 21 Aug 2013.

To cite this article: Kristina Hahn & Anna Holzscheiter (2013) The Ambivalence of Advocacy: Representation and Contestation in Global NGO Advocacy for Child Workers and Sex Workers, *Global Society*, 27:4, 497-520, DOI: [10.1080/13600826.2013.823914](https://doi.org/10.1080/13600826.2013.823914)

To link to this article: <http://dx.doi.org/10.1080/13600826.2013.823914>

PLEASE SCROLL DOWN FOR ARTICLE

Taylor & Francis makes every effort to ensure the accuracy of all the information (the "Content") contained in the publications on our platform. However, Taylor & Francis, our agents, and our licensors make no representations or warranties whatsoever as to the accuracy, completeness, or suitability for any purpose of the Content. Any opinions and views expressed in this publication are the opinions and views of the authors, and are not the views of or endorsed by Taylor & Francis. The accuracy of the Content should not be relied upon and should be independently verified with primary sources of information. Taylor and Francis shall not be liable for any losses, actions, claims, proceedings, demands, costs, expenses, damages, and other liabilities whatsoever or howsoever caused arising directly or indirectly in connection with, in relation to or arising out of the use of the Content.

This article may be used for research, teaching, and private study purposes. Any substantial or systematic reproduction, redistribution, reselling, loan, sub-licensing, systematic supply, or distribution in any form to anyone is expressly forbidden. Terms & Conditions of access and use can be found at <http://www.tandfonline.com/page/terms-and-conditions>

The Ambivalence of Advocacy: Representation and Contestation in Global NGO Advocacy for Child Workers and Sex Workers

KRISTINA HAHN and ANNA HOLZSCHEITER

In this article, we explore the ambivalent relationship between international advocacy non-governmental organisations (NGOs) and the constituencies on whose behalf they act and speak in institutions of global governance. Our overall argument is that advocacy NGOs whose legitimacy and authority depend on their role as representatives of marginalised and disenfranchised populations are in many cases prone to exploit discourses on vulnerability and victimhood in order to fortify their own identity as “advocates”. Exploring and comparing two case studies on prostitution and child labour, we seek to demonstrate that the ascription of identities by advocacy NGOs to their beneficiaries is an empirically contested phenomenon. When the allegedly weak and “voiceless” persons whom advocacy NGOs claim to represent start to defend their own interests and publicly contradict the positions advocated on their behalf, conflict between these groups arises. We observe this dynamic particularly concerning the “abolition” of harmful practices, such as child work and prostitution. Child workers and prostitutes contest the way in which they are portrayed by their advocates in public discourse and especially resist the ascription of a “victim” identity.

Introduction

Today, international non-governmental organisations (NGOs) have secured access to virtually all institutions of global governance, even if their room for manoeuvre varies starkly across different institutional settings. In this context, NGOs¹ are often considered to speak for “marginalised” or otherwise disempowered

*We thank Marta Reuter, Klaus Dingwerth, Jutta Joachim and Benjamin Stachursky for their invaluable comments on various versions of this article. Our thanks also go to James Holloway and Nicole Gonyea who have been of great assistance in the final stages of writing and editing the article.

1. NGOs can be defined as “formal (professionalized) independent societal organizations whose primary aim is to promote common goals at the national and the international level” (Kerstin Martens, “Mission Impossible? Defining Nongovernmental Organizations”, *Voluntas: International Journal of Voluntary and Nonprofit Organization*, Vol. 13, No. 3 [2002], pp. 271–285, at p. 282). In this article, we mainly concentrate on advocacy NGOs, but also refer to transnational advocacy coalitions (TACs). TACs include, more broadly, local social movements, foundations, the media, religious groups and trade unions, intergovernmental organisations and governments. NGOs constitute the central component of TACs, however (Margaret Keck and Kathryn Sikkink, *Transnational Advocacy Networks in International and Regional Politics* [Paris: UNESCO, 1999], p. 92).

populations normally excluded from global policy-making.² The increasing involvement of NGOs in international decision-making processes, however, raises questions with regard to NGOs' representativeness, their legitimacy and accountability. NGOs' growing success and visibility demands research into how these organisations and their networks go about their business, whom they are speaking for and how they set their agenda and strategies.³ A particularly thorny matter in this context is the question of NGOs' representativeness. It is a contested issue whom NGOs can legitimately claim to represent and be accountable to: to their members, to the direct beneficiaries of their work, to all affected by their policies, or to the general public?⁴

There is a vast debate on NGOs' legitimacy, accountability and right to representation in International Relations literature.⁵ We take this literature as a point of reference, but develop a different perspective on the possibly problematic relationship between advocacy NGOs and their beneficiaries. While this article is a contribution to the increasing debate on NGOs' representativeness, its starting point is empirical-analytical rather than normative. Our analysis is not based on prefigured ideas regarding the ideal-type relationship between advocacy NGOs and their constituencies. Rather, by analysing different aspects of the representative power of NGOs, we aim, firstly, to address NGOs' discursive power of representation and the discursive strategies with which they construct and thus also ascribe identities to their constituencies, and secondly, to point to the pronounced conflicts over legitimate representation between advocacy NGOs and other civil society actors that allow picturing international political advocacy as a fundamentally contested terrain of civil society activism.

Increasingly, scholars focus on critical aspects of NGO work. They contradict the assumption of a global civil society composed of voluntary associations as a progressive force for "good". Aamore and Langley state that the normative position on civil society "overplays the consensual and coherent characteristics of Global Civil Society to the neglect of power relations, contradictions and tensions".⁶ Lipschutz, along with Sending and Neumann, highlights that civil

2. Sanjeev Khagram, James V. Riker and Kathryn Sikkink (eds.), *Restructuring World Politics. Transnational Social Movements, Networks, and Norms* (Minneapolis and London: University of Minnesota Press, 2002), p. 312.

3. Paul J. Nelson, "Accountability, and Legitimacy among Transnational Networks Lobbying the World Bank", in Khagram, Riker and Sikkink, *op. cit.*, pp. 131–154, at p. 150.

4. For an overview of this debate, see Erik B. Bluemel, "Overcoming NGO Accountability Concerns in International Governance", *Brooklyn Journal of International Law*, Vol. 31, No. 1 (2005), pp. 139–207.

5. See, for example, Vivien Collingwood and Louis Logister, "State of the Art: Addressing the INGO 'Legitimacy Deficit'", *Political Studies Review*, Vol. 3 (2005), pp. 175–192; Jan Aart Scholte, "Civil Society and Democratically Accountable Global Governance", *Government and Opposition*, Vol. 39, No. 2 (2004), pp. 211–233; Jem Bendell, *Debating NGO Accountability*, NGLS Development Dossier, available: http://www.un-ngls.org/orf/pdf/NGO_Accountability.pdf (accessed 10 August 2009); Anna Holzscheiter, "The Representational Power of Civil Society Organisations in Global AIDS Governance. Advocating for Children in Global Health Politics", in Thomas Olesen (ed.), *Power and Transnational Activism* (Oxford and New York: Routledge, 2010), pp. 173–189; Jens Steffek and Kristina Hahn (eds.), *Evaluating Transnational NGOs. Legitimacy, Accountability, Representation* (Basingstoke: Palgrave Macmillan, 2010); for an overview, see Steve Charnovitz, "Accountability of Nongovernmental Organizations (NGOs) in Global Governance", Paper presented at the Conference on Global Administrative Law, NYU Law School, 22–23 April 2005.

6. Louise Aamore and Paul Langley, "Ambiguities of Global Civil Society", *Review of International Studies*, Vol. 30 (2004), pp. 89–110, at p. 97.

society is part of the dominant governmentality and simply serves to legitimise, reproduce and amend a neo-liberal regime.⁷ Rather than seeing NGOs as either “good” or “bad” (e.g. as part of a neo-liberal regime),⁸ in this article we wish to focus on conflict and tension around representation within the non-governmental field without taking a normative standpoint in favour of (or against) any of the positions which are articulated and their inherent forms of representation.

This focus on conflict and tension within the non-governmental field and on unequally distributed resources in these conflicts is shared by authors such as Holzscheiter who emphasise both the opportunities and structural restrictions for non-state actors to successfully make use of their discursive repertoires in the global language market.⁹ Studies question the way in which advocacy NGOs decide which cases to choose for their campaigns based on a market model of supply and demand,¹⁰ or focus on conflicts within NGO networks and on mechanisms that “receiving end” grassroots activists have at their disposal in order to change transnational human rights campaigns.¹¹ Clifford Bob’s work, *The Marketing of Rebellion*, for example, points to the gatekeeping role—or power—of many Northern NGOs, whose material and ideational resources (reputation, networks, etc.) put them in a position to support some issues and actors, while denying the same support to others. While our analysis ties in with this conceptualisation of the representational power of NGOs, its focus departs from the strategies and tactics of NGOs to gain power, pointing instead to contestation and resistance at the “receiving end” of international campaigns. Even though our analysis shares much of the focus of Shareen Hertel’s work on conflicts within the civil society landscape that has built up around specific issue areas,¹² our argument takes a different direction. We contend throughout this article that representational power is a forceful source of legitimacy for transnational advocacy NGOs participating in the institutional landscape that constitutes global governance and that, as a consequence, they often tend to perpetuate an identity of their constituency as particularly powerless, mute and vulnerable in order to justify their own role as rightful representatives. What is more, by referring to representational power as discursive power, we seek to show it has two central facets: a formal and a performative one.¹³

7. Ronnie D. Lipschutz, “On the Transformational Potential of Global Civil Society”, in Felix Berenskoetter and M.J. Williams (eds.), *Power in World Politics* (Abingdon and New York: Routledge, 2007), pp. 225–243; Ole Jacob Sending and Iver B. Neumann, “Governance to Governmentality: Analyzing NGOs, States, and Power”, *International Studies Quarterly*, Vol. 50 (2006), pp. 651–672.

8. See also Julie Hemment, “The Riddle of the Third Sector: Civil Society, Western Aid and NGOs in Russia”, *Anthropological Quarterly*, Vol. 77, No. 2 (2004), pp. 215–241, available: http://works.bepress.com/julie_hemment/5 (accessed 25 October 2012).

9. Anna Holzscheiter, “Discourse as Capability: Non-State Actors’ Capital in Global Governance”, *Millennium*, Vol. 33, No. 3 (2005), pp. 723–746.

10. Clifford Bob, *The Marketing of Rebellion. Insurgents, Media, and International Activism* (New York: Cambridge University Press, 2005); Vanessa Pupavac, “Refugee Advocacy, Traumatic Representations and Political Disenchantment”, *Government and Opposition*, Vol. 43 (2008), pp. 270–292.

11. Shareen Hertel, “New Moves in Transnational Advocacy: Getting Labor and Economic Rights on the Agenda in Unexpected Ways”, *Global Governance*, Vol. 12 (2006), pp. 263–281.

12. Shareen Hertel, *Unexpected Power. Conflict and Change among Transnational Activists* (Ithaca and London: ILR Press, an imprint of Cornell University Press, 2006).

13. Hertel’s analysis focuses on two central mechanisms—blocking and backdoor moves—that resisting NGOs employ in order to contest international campaigns and the norms they support (Hertel, *Unexpected Power*, *op. cit.*, pp. 5–9). While our analysis of representational dynamics in the two

International Relations research on global civil society and representation has, for a considerable time, narrowed down its focus on power asymmetries between state and civil society actors and organisations, particularly where these actors form part of the same international institutions, forums and conferences. Consequently, most empirical analyses have been preoccupied with the possibilities of NGOs to gain formal access to international organisations and events, the deliberative space granted to them and their possibilities for shaping state-dominated policy-making.¹⁴ With regard to NGOs' power, scholars have focused on their discursive power resources (which they call "soft power", applying Nye's concept to non-state actors)¹⁵ vis-à-vis state delegates or officials of international organisations. The exclusionary facets of NGO participation in global governance structures and the competition among NGOs for authority, legitimacy and representational power in international institutions that has gone hand in hand with the ever-increasing permeability of international organisations towards societal actors are only now beginning to attract more scholarly interest. However, even where studies analyse the power asymmetries among NGOs, they emphasise the formal dimensions of NGOs' representational power rather than the performative aspect of representation, i.e. the social and discursive practices of representation through which NGOs seek to bolster their influence in a growingly competitive global civil society.¹⁶ In contrast, we suggest that a comprehensive analysis of representational power must combine the analysis of both formal/material and performative/discursive dimensions of representation.

In this article, we focus in particular on the latter dimension and base our analysis on the relationship between discourse, power and identity that has been conceptualised, most famously, by Michel Foucault. According to Foucault's understanding of power as productive, discourses create subjects and their identities (rather than being oppressive, censorious and prohibitive as the "repression hypothesis" of power suggests).¹⁷ Following Foucault, it is not the individual in

cases—child labour and prostitution—confirms the centrality of these strategies, we still refrain from calling them "mechanisms" as this analytical device implies a strong causality. Our analysis, by contrast, is located at the discursive level and therefore seeks to understand the processes through which identities and "issues" are discursively established and contested. We therefore prefer to see "blocking" and "backdoor moves" as some practices or strategies among many others with which constituencies or grassroots organisations seek to influence global discourses and campaigns.

14. Christer Jönsson and Jonas Tallberg, *Transnational Actors in Global Governance: Patterns, Explanations, and Implications* (Basingstoke: Palgrave Macmillan, 2010); Rodger A. Payne and Nayef H. Samhat, *Democratizing Global Politics. Discourse Norms, International Regimes, and Political Community* (Albany: SUNY Press, 2004); Jens Steffek, Claudia Kissling and Patrizia Nanz (eds.), *Civil Society Participation in European and Global Governance. A Cure for the Democratic Deficit?* (Basingstoke: Palgrave Macmillan, 2007).

15. See Joseph Nye, "Soft Power", *Foreign Policy*, Vol. 80 (1990), pp. 153–171; Joseph Nye, *Soft Power. The Means to Succeed in World Politics* (New York: PublicAffairs, 2004). While in his first articles Nye referred primarily to the power of states, in particular the USA or other "great powers", later he became particularly interested in the soft power of non-state actors, including terrorist networks (Nye, *Soft Power*, *op. cit.*, p. 90 *et seq.*). Khagram *et al.* apply the concept to NGOs and their influence in international organisations. See in particular Kathryn Sikkink, "Restructuring World Politics: The Limits and Asymmetries of Soft Power", in Khagram, Riker and Sikkink, *op. cit.*, pp. 301–317.

16. D.L. Carr and Emma S. Norman, "Global Civil Society? The Johannesburg World Summit on Sustainable Development", *Geoforum*, Vol. 39, No. 1 (2008), pp. 358–371.

17. Michel Foucault, *Überwachen und Strafen. Die Geburt des Gefängnisses* (Frankfurt am Main: Suhrkamp, 1976); Michel Foucault, *Der Wille zum Wissen. Sexualität und Wahrheit Band 1* (Frankfurt am Main: Suhrkamp, 1977).

his or her physical existence which is produced, but the individual as a specific *kind* of subject.¹⁸ The production of identities therefore means the *discursive construction of classifications* of the individual¹⁹—referring to categories that are created for the individuals such as “homosexual”, “mad”, and so on. From a Foucauldian perspective, discourses are powerful meaning-patterns that define the borders of what can be said and thought, and underlie particular “regimes of practice”²⁰ which produce subjectivities and reflect social conventions. The re-orientation of the analysis of power towards its effects rather than its nature, which is reflected in Foucault’s writings, is being seized by a growing number of IR scholars. Some of them use a Foucauldian lens in order to explore how non-state actors contribute to the construction of identities and are themselves defined by powerful discourses. Epstein’s analysis of the contribution of environmental NGOs to an ever more powerful global discourse condemning whale-hunting, for example, sees these NGOs as both actively constructing the anti-whaling discourse and being, at the same time, themselves constructed in this process by being part of a specific field of interactions.²¹

Our article ties in with this literature on the link between power and discourses by arguing that through their increasing engagement and authority in international institutions, NGOs are conferred significant power to attribute identities to those they represent. We understand this as a potentially powerful process in which specific discursive classifications can be made and will demonstrate that it is a major point of contestation between NGOs and their beneficiaries. Our argument proceeds as follows. In a first step, we will explicate the conceptual framework we propose for the study of Civil Society Organizations (CSOs)’ representational power in global governance. We will then explain the benefits of an empirical comparison between two very prominent fields of civil society advocacy—prostitution and child labour—pointing particularly to the striking similarities between these two areas of international concern. In a third step, we will analyse the representational power of global advocacy organisations through the lens of our theoretical framework, paying particular attention to the contestation of representational practices by the imagined constituencies of global CSOs, particularly Southern actors. In conclusion, we will point out a number of limitations presented by our empirical analysis and make suggestions for future research.

Exploring the Limits of Advocacy: Attributing Identities in the Prostitution and Child Work Cases

In this article, we want to broach the issue of voice in international relations by concentrating on the representational relationship between advocacy NGOs and their beneficiaries. We will argue that advocacy NGOs are placed in an increasingly uncomfortable position between gaining international recognition *precisely*

18. Ian Hacking, *The Social Construction of What?* (Cambridge, MA and London: Harvard University Press, 1999).

19. *Ibid.*, p. 10.

20. Michel Foucault, “Questions of Method”, in G. Burchell, C. Gordon and P. Miller (eds.), *The Foucault Effect: Studies in Governmentality* (Chicago: University of Chicago Press, 1991), pp. 73–86, at p. 75.

21. Charlotte Epstein, *The Power of Words in International Relations. Birth of an Anti-Whaling Discourse* (Boston, MA: MIT Press, 2008).

through their role as legitimate representatives of otherwise voiceless groups on the one hand, and their growing acceptance of rights-based approaches that emphasise empowerment, downward accountability and far-reaching participatory rights for their constituencies on the other.

For the purpose of a first and rough differentiation among NGO “types”, it has been common to distinguish between mainly service-oriented and advocacy NGOs.²² Advocacy NGOs claim to work on behalf of others who lack the voice or access needed to promote their own interests. Therefore, advocacy NGOs represent certain imaginary or real clients, whose quality of life the NGO was established to improve. In this context, we would further distinguish between “mute clients”, like plants or animals, and people who could theoretically speak for themselves.²³ These people are often marginalised populations perceived as weak and lacking the resources to speak for themselves, such as child workers, disabled persons, elderly people, immigrants or prostitutes. But it is becoming more and more difficult to classify NGOs in terms of traditional charity (service-providing) vs. advocacy organisations as many of the former have adopted rights-based philosophies and established advocacy branches. In addition, all NGOs advocating on behalf of others at least claim to listen to these persons either through close cooperation with service-oriented groups on the grounds or through integrating (some of) these persons into their decision-making structures or implementation processes.

A development that further complicates the advocacy picture is the increasing trend of supposedly marginalised peoples organising themselves into their own movements and grassroots groups, for example sweatshop workers who organise locally and globally in order to improve their work conditions²⁴ or sex workers organised in the Network of Sex Work Projects (NSWP). While movements such as the NSWP were initially constituted as loose networks of single activists, many of them evolve into institutionalised non-governmental organisations.

Conflict arises when the viewpoints held by these groups of allegedly “weak and voiceless people” contradict those their self-appointed advocates hold for them. In particular, politics around the abolition of harmful practices such as child work and prostitution appears to show tension and open conflict between internationally operating NGOs striving for the abolition of these practices on the one hand, and those allegedly helpless and weak persons on the other who contest the way in which they are portrayed by their advocates in public discourse. These persons particularly resist the ascription of a “victim” identity.

However, the groups of self-organised persons concerned, such as sex workers or child workers, often rely on the support of other international professionalised NGOs in order to get access to decision-making forums and also in terms of simple

22. See Hildy Teegen, Jonathan P. Doh and Sushil Vachani, “The Importance of Nongovernmental Organizations (NGOs) in Global Governance and Value Creation: An International Business Research Agenda”, *Journal of International Business Studies*, Vol. 35 (2004), pp. 463–483; Kerstin Martens, *NGOs in the UN System. A Study of Institutionalised Relations between Societal Actors and the United Nations*, PhD Dissertation, European University Institute, 2003.

23. For a distinction similar to the one undertaken here between NGOs speaking for a general interest (or mute things), on the one hand, and those speaking on behalf of beneficiaries, on the other, see also Justin Greenwood and Darren Halpin, “The Public Governance of Interest Groups in the European Union: Does Regulating Groups for ‘Representativeness’ Strengthen Input Legitimacy?”, Paper presented at the 3rd ECPR Conference, Budapest, September 2005.

24. Miriam Ching Yoon Louie, *Sweatshop Warriors. Immigrant Women Workers Take on the Global Factory* (Cambridge, MA: South End Press, 2001).

material support such as travel grants and so on. In the past, NGOs such as the Global Alliance against Traffic in Women provided self-organised sex workers' groups with platforms and space for their meetings.²⁵ These NGOs characterise themselves as *facilitators* or *catalysts* for those they aim to empower, rather than advocates. They claim that their main objective is to provide technical assistance to "get people organised".²⁶ Once in place, organisations of affected people should then become self-contained, with the facilitating NGO gradually retreating. In this way, Miljeteig's analysis of child and youth workers' associations concludes that "[a]lthough initiated by adults, or by adults and youth in collaboration, the organisations as we see them today should be regarded as children's organisations".²⁷ Many facilitators rather than advocates make this explicit in their organisational philosophies.²⁸

In this article, we claim that in the two cases we look at (prostitution and child work) there is a huge difference between a number of influential International Nongovernmental Organizations (INGOs) operating on a global scale often emanating from classic charity organisations with a clear focus on the abolition of certain practices and the protection of the persons concerned on the one hand, and self-organised groups (such as the NSWP) on the other. Many INGOs collaborate closely with intergovernmental (IGOs) or supranational organisations and enjoy wide access to institutional arenas in which far-reaching policy decisions are made—most notably the UN system, the International Labour Organisation (ILO), the World Bank and the European Union.²⁹ Self-organised groups of child workers or sex workers do not have such close and historically grown relationships with IOs, since most often they started as loosely organised groups focusing primarily on the national level. Therefore, they still struggle to get access to these forums. Their often more radical agenda makes it more difficult for them to find allies among state delegates than it is for more "moderate" INGOs.

For both issues, one can hence observe NGOs and advocacy networks who act and speak *on behalf* of those affected (advocacy, representation, top-down) on the one side of the continuum and networks mainly composed of and maintained by those affected (grassroots, self-help, bottom-up) on the other. The latter have their origin in the struggle of single activists who situate their protest within a labour movement rationale and strongly contradict their description of the persons concerned as helpless victims. In the middle of this continuum, we may situate those

25. Global Alliance against Traffic in Women (GAATW), Newsletter Issue 14 (July 2000), p. 7 *et seq.*

26. In the child labour case, examples of such NGOs are Butterflies (India), Save the Children UK, terre des hommes (Germany), or the Senegal-based ENDA, an NGO that supports Niños y Adolescentes Trabajadores (NATs) in West Africa. ENDA provides children with an education geared to their situation (in the evenings and with the content worked out with the students), legal aid and help in negotiating cheaper medicine and hospital care. See http://endatiersmonde.org/institut/index.php?option=com_content&view=article&id=108&Itemid=91&lang=en (accessed 19 June 2012).

27. Per Miljeteig, *Creating Partnerships with Working Children and Youth* (Washington: The Social Protection Unit, Human Development Network, The World Bank, 2000), p. 10.

28. Anthony Swift, "India—Tale of Two Working Children's Unions", in Manfred Liebel, Bernd Overwien and Alfred Recknagel (eds.), *Working Children's Protagonism: Social Movements and Empowerment in Latin America, Africa and India* (Frankfurt am Main and London: IKO—Verlag für Interkulturelle Kommunikation, 2001), pp. 184–185.

29. Ben White, "Defining the Intolerable. Child Work, Global Standards and Cultural Relativism", *Childhood*, Vol. 6, No. 1 (1999), pp. 133–144, at p. 139.

organisations and networks that see their main task as facilitators and that offer space and platforms for the self-organising efforts of the persons concerned.

The following discussion will mainly focus on observable collisions and discursive struggles between grassroots networks and large INGO networks (positioned at the two ends of the continuum). We will also briefly discuss the various ways in which NGOs claiming to act as “facilitators” have attempted to avoid the ambivalence of advocacy and representation.

Comparing the Child Work and Prostitution Cases

The two cases under scrutiny in this article share the commonality that the majority of NGOs situated on one side of our continuum are morally impelled to abolish these ‘social problems’ to improve people’s lives and progress civilisation.³⁰ Alternatives, or even solutions, to child work are typically based on free and compulsory education, poverty reduction and the transformation of societal values with regard to children.³¹ In the case of prostitution, the abolitionist NGOs aim at eradicating gender inequalities and socially accepted forms of male violence against women, the transformation of societal attitudes towards sexuality, the de-criminalisation of prostitutes and the criminalisation of clients.³² It was chiefly the denial of agency and free will promoted by a victimisation discourse that provoked NGOs to speak on behalf of helpless, suffering groups of human beings—feminist associations for prostitutes and child-saving associations for working children. On the other side of the continuum, we find in both cases groups of self-organised activists who resist this portrayal as helpless and suffering and claim to speak on their own behalf. These groups situate their own activism within a labour movement framework; they struggle for the improvement of working conditions, for their recognition as workers and for the attribution of social and economic rights. Interestingly, both of these groups—the advocacy NGOs and the self-organised groups of sex workers and child workers—refer to the global discourse on human rights. They do so either with a focus on the protection of bodily integrity of vulnerable persons or by referring to socio-economic rights. The human rights discourse seems to constitute a point of reference for both groups. This underlines the importance of the discourse on human rights, which according to a Foucauldian perspective can be seen as a global norm “with reference to which agents are evaluated and increasingly evaluate themselves”³³ and through which forms of agency are constituted.

30. See Global March against Child Labour, description of philosophy, available: <http://www.globalmarch.org/aboutus/who-we-are> (accessed 13 August 2013).

31. David M. Smolin, “Strategic Choices in the International Campaign against Child Labor”, *Human Rights Quarterly*, Vol. 22 (2000), pp. 942–987; David M. Smolin, “Conflict and Ideology in the International Campaign against Child Labour”, *Hofstra Labor & Employment Law Journal*, Vol. 16 (1999), pp. 383–450; White, *op. cit.*; William E. Myers, “Considering Child Labour. Changing Terms, Issues and Actors at the International Level”, *Childhood*, Vol. 6, No. 1 (1999), pp. 13–26; William E. Myers, “The Right Rights? Child Labor in a Globalizing World”, in Jude L. Fernando (ed.), *Globalization and Children’s Rights* (Thousand Oaks, CA: Sage, 2001), pp. 38–55; Organisation for Economic Co-operation and Development (OECD), *Combating Child Labour. A Review of Policies* (Paris: OECD, 2003).

32. Lenore Kuo, *Prostitution Policy. Revolutionizing Practice through a Gendered Perspective* (New York and London: New York University Press, 2002); Belinda J. Carpenter, *Re-thinking Prostitution. Feminism, Sex and the Self* (New York: Peter Lang Publishing, 2000), pp. 125–137.

33. Ivan Manokha, “Foucault’s Concept of Power and the Global Discourse of Human Rights”, *Global Society*, Vol. 23, No. 4 (2009), pp. 429–452, at p. 429.

With regard to the interpretation of the human rights discourse by the abolitionist NGOs, perhaps the strongest common denominator between child workers and prostitutes throughout 20th-century international politics is the portrayal of both groups as innocent and stigmatised human beings marginalised from society. It seems quite “natural” to depict children as “innocent victims”, but the discourse on prostitution contains similar characterisations. In the abolitionist discourse, female prostitutes are described as objects of male violence and abuse. The violence they experience renders a “free choice” of these women impossible, hence they are not responsible for their actions. As we will demonstrate further below, this characterisation of the irresponsible forced prostitute leads to a “child-like” description of these persons. Consequently, global public debates on child work and prostitution have been deeply marked by a language of vulnerability, purity and victimisation on the part of many of those struggling to abolish the practices in question. This has been joined by a strong emphasis on “rehabilitation” and “re-integration” in policies created to target child work and prostitution.³⁴

Both issues concern phenomena/“social problems” which take place in several countries and are, hence, not restricted to the national realm. In particular, these phenomena point to conflicts between values of a “proper childhood”, of female sexuality and the family promoted by advocacy NGOs (originating in Europe or the US) on the one hand, and activists’ mobilisation all over the world whose life realities do not conform to these values on the other. Due to the inter/transnational nature of these discourses, the conflicts take place at international venues and within international organisations involving problems of access for the self-organised groups in particular. These characteristics of the discourses, the conflicts and actors involved may allow us to draw some tentative conclusions on the representational power of NGOs beyond a single case study.

The Origins of Advocacy for the Abolition of Prostitution and Child Work

Both of the issue areas this article discusses—prostitution and child work³⁵—have long incited fervent public debate and seen an international “revival” with the late 20th-century globalisation. Transnational advocacy coalitions (TACs) have grown around the issues of prostitution and child work since the 19th century. The strongest TACs have always been those seeking to abolish the practices in question on behalf of the “innocent victims”: working children and youth (NATs),³⁶ and sex workers.³⁷ International concern with prostitution was associated with the

34. Liebel, Overwien and Recknagel, *op. cit.*; Carpenter, *op. cit.*

35. We use the term “child work” rather than “child labour” here, adopting Miljeteig’s argumentation (Miljeteig, *op. cit.*, p. 6) that it is less ideologically laden than “child labour”. “Child labour” will be used either for child labour abolitionist movements or exploitative and harmful forms of child work.

36. NATs (Niños y Adolescentes Trabajadores) is the common self-reference of child workers. It emerged in the Latin American child worker movement in the 1970s and 1980s and is today used internationally.

37. Both terms are taken from the concerned peoples’ own discourses within which they attempt to reposition their identity: “working children and youth” rather than “child labourers”; “sex workers” instead of “prostitutes”. Even though sex workers include men, women and transgender persons, this article will predominantly focus on women prostitutes. The exclusion of “male” voices from

social purity movement and the fight against “white slavery”. As Dru Stanley convincingly argues, prostitutes were a challenge to the anti-slavery movement in the 19th century since prostitution posed questions about tradable goods, where the market’s moral boundaries are and the dividing line between selling labour and “selling yourself”, thus pointing to the slippery slope back to slavery.³⁸ By 1885, beginning in Britain, public outrage against the (forcible) trafficking of women had surfaced and prompted several social movements to target this issue. Trafficking of women was framed as “white slavery” and hence had an inherent racist component, since it focused on white women whose integrity should be preserved.

Although the feminist movement initially allied with the prostitutes and protested against regulationist legislation on prostitution, it aimed to eventually abolish all prostitution. The (feminist) abolitionist movement merged with the social purity movement, which focused in particular on the sexual behaviour of young people.³⁹ Church organisations have played a major role in creating national and international awareness of this issue.⁴⁰ The early abolitionist movements against prostitution initiated by middle-class feminists were characterised by an authority relationship towards younger, working-class women.⁴¹ Working conditions in brothels and the possible exploitation of women in prostitution was a “blind spot” of the debate, which “dismissed the possibility of ‘voluntary prostitution’ altogether”, especially when it came to migrant prostitutes.⁴² The movement excluded prostitutes from the campaign in which they had no voice.⁴³

International concern with white slavery resulted in international agreements in 1904, 1910 and two agreements adopted by the League of Nations in 1921 and 1933. After a period of silence due to the Second World War, issues of trafficking and prostitution returned to the international agenda in the newly founded UN and led to the adoption of the 1949 UN Convention for the Suppression of the Traffic in Persons and the Exploitation of the Prostitution of Others. After 1949, several further UN documents, such as the 1979 Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), the 1993 Declaration of the Vienna World Conference on Human Rights and the 1995 Beijing Declaration, dealt with issues of prostitution and/or trafficking. The UN Protocol to prevent, suppress and punish trafficking in persons (supplementing the UN

prostitution and sex work discourses adds another dimension to the limits of representation and advocacy but cannot be dealt with in the context of this article.

38. Amy Dru Stanley, *From Bondage to Contract. Wage Labor, Marriage, and the Market in the Age of Slave Emancipation* (Cambridge, UK: Cambridge University Press, 1998), p. 218 *et seq.*

39. William Alexander Coote, *A Vision and its Fulfilment* (London: The National Vigilance Association, 1910), cited in Jo Doezema, “Loose Women or Lost Women? The Re-emergence of the Myth of ‘White Slavery’ in Contemporary Discourses of ‘Trafficking in Women’”, *Gender Issues*, Vol. 18, No. 1 (2000), pp. 23–50, at p. 27.

40. Lilian Mathieu, *Prostitution et SIDA. Sociologie d’une épidémie et de sa prévention* (Paris: L’Harmattan, 2000), p. 66.

41. Judith R. Walkowitz, “The Politics of Prostitution”, *Signs*, Vol. 6, No. 1 (Autumn 1980), pp. 123–135, at p. 125.

42. Petra de Vries, “‘White Slaves’ in a Colonial Nation: The Dutch Campaign against the Traffic in Women in the Early Twentieth Century”, *Social and Legal Studies*, Vol. 14, No. 1 (2005), pp. 39–60, at p. 45.

43. *Ibid.*, p. 45.

Convention against transnational organised crime) was adopted in 2000. It was the first document that exclusively targeted the issue of trafficking and did not only focus on prostitution.

Child work issues also saw a rather dramatic shift in public and private perspectives towards the end of the 19th century. Children were no longer seen and treated as young adults and a welcome addition to the workforce, or simply irrational and deviant. It was acknowledged that children needed particular assistance and care due to their vulnerability.⁴⁴ This new appreciation was accompanied by a dramatic transformation of society. Early industrialisation in Europe and North America brought higher living standards among the lower and middle classes, and an ideal of childhood as a protected sphere for a happy, carefree and labour-free phase of life gradually took hold, even among the working class. The emergent, affluent middle class no longer needed children as an economic resource for additional family income. Educational institutions became widely accessible to children, keeping them out of factories and off the streets. This was greatly facilitated by child labour legislation, such as the 1878 Factory Act by the British Parliament, which prohibited the employment of any child under the age of 10 and provided for compulsory education for all children up to the age of 10. Among the first conventions by the ILO, founded in 1919, was the Minimum Age Convention (Convention No. 5), which prohibited children under the age of 14 working in States Parties' factories. From its inception, the ILO was strongly focused on the issue of child labour—for example, regulation on the exploitation of children through debt bondage or child prostitution through its Forced Labour Convention (no. 29) in 1930.⁴⁵

In the cases of both child labour and prostitution, social movements politicised these issues and were a major driving force behind the adoption of the first international conventions. Alongside industrialisation processes, there was increasing concern with social spheres such as the family and (female) sexuality commercialised by the market.

The Child Work Case

For the greater part of the 20th century, child work has ranged among those subjects generating “deep emotions and growing international concern”.⁴⁶ As a consequence, international law in this field has continuously expanded, a process that has been reflected particularly in the policies and conventions of the ILO. From the creation of the ILO in 1919 to the present day, child labour has occupied centre stage as an issue of contention between ILO member states, trade unions and employers, associations. Today, it is particularly the ILO's International Programme on the Elimination of Child Labour, established in 1992, which is the core programme for the gradual abolition of child labour. The 1989 UN

44. Priscilla Robertson, “Das Heim als Nest. Mittelschichtenkindheit in Europe im neunzehnten Jahrhundert”, in Lloyd de Mause (ed.), *Hört Ihr die Kinder weinen* (Frankfurt am Main: Suhrkamp, 1977), pp. 596–597.

45. International Labour Office, *Child Labour. Targeting the Intolerable* (Geneva: International Labour Office, 1998); International Labour Conference, International Labour Office and Inter-Parliamentary Union, *Eliminating the Worst Forms of Child Labour. A Practical Guide to the ILO Convention No. 182*, Handbook for Parliamentarians No. 3 (Geneva: International Labour Office, 2002).

46. Roland Pierik and Mijke S. Houwerzijl, “Western Policies on Child Labor Abroad”, *Ethics & International Affairs*, Vol. 20, No. 2 (2006), pp. 193–218.

Convention on the Rights of the Child enshrines the right of the child to be free from any form of commercial exploitation and to be protected “from any work that is likely to be hazardous or to interfere with the child’s education”.⁴⁷ The 2002 Optional Protocol to the UN Convention on the Rights of the Child on the sale of children, child prostitution and child pornography was the last international treaty adopted which deals *inter alia* with certain “worst forms” of child labour. At the beginning of the 21st century, increasing recognition of globalisation processes (trade, migration, communication, etc.) renewed concern in industrialised countries’ public debates on child work and spilled over into international politics. Child work has now become a central issue in debates about the globalisation of trade, de-regulation of labour markets, a “social clause”, and practices of corporate social responsibility. It is particularly the Global Compact, a code of conduct for transnationally operating firms,⁴⁸ that has established a strong connection between child labour and business ethics. Established in 2000, it stipulates in its 10 principles, *inter alia*, that businesses should work towards “the effective abolition of child labour”.⁴⁹

Yet it has also been a contentious issue. That millions of children around the world manage similar or even greater workloads than adults, work under hazardous circumstances and enjoy little or no occupational health and safety has provoked the question “about how children’s rights are to be defined and observed in an era of globalisation”.⁵⁰ International efforts to tackle the issue have had to struggle, from the onset, to differentiate detrimental child *labour* from forms of child *work* that might have a positive social and vocational effect on children.⁵¹ Even though the ILO has tried to identify the “worst forms of child labour” with its 1999 Convention No. 182, the issue of child work versus child labour is highly contested.⁵² This differentiation also has normative implications. While most NGOs and IGOs working against child labour have, by now, acknowledged that certain forms of light *work* (helping in the household, earning pocket money, babysitting, etc.) might be part of childhood, they have difficulties defining what child *labour* is. In fact, Convention 182 distinguishes harmful employment (“labour”) from other forms of child work and contains a whole catalogue of criteria defining these “worst forms”. It is seen by many as a more progressive instrument to confront child labour than its predecessor, Convention 138. However, some international organisations, such as the Organisation for Economic Co-operation and Development (OECD), still assume that any work interfering with a child’s school attendance must be considered detrimental to the child and, as such, is child labour.⁵³

47. General Assembly resolution 44/25 of 20 November 1989, ‘United Nations Convention on the Rights of the Child’, entered into force 2 September 1990, Article 32 (1).

48. Koen de Feyter, “The Prohibition of Child Labour as a Social Clause in Multilateral Trade Agreements”, in Eugen Verhellen (ed.), *Understanding Children’s Rights* (The Hague, Boston, MA and London: Martinus Nijhoff Publishers, 1996), pp. 431–444; Smolin, “Conflict and Ideology”, *op. cit.*; Smolin, “Strategic Choices”, *op. cit.*

49. United Nations Global Compact, “The Ten Principles”, available: www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/index.html (accessed 8 November 2012).

50. Myers, “The Right Rights?”, *op. cit.*, p. 39.

51. Virginia Morrow, “Should the World Really Be Free of ‘Child Labour’? Some Reflections”, *Childhood*, Vol. 17, No. 4 (2010), pp. 435–440.

52. Abebe Tatek and Sharon Bessell, “Dominant Discourses, Debates and Silences on Child Labour in Africa and Asia”, *Third World Quarterly*, Vol. 32, No. 4 (2011), pp. 765–786.

53. OECD, *op. cit.*, pp. 9–10.

Childhood, play, happiness and the power of representation: the dominant discourse and its main proponents

For some, the international debate revolving around child work showcases the strong influence of Western or Northern childhood ideals on global policies for child protection.⁵⁴ Many INGOs and NGO networks addressing child labour and speaking on behalf of child workers have endorsed a philosophy of childhood with the central dimensions of “family home”, school and leisure. They see the “right to childhood” as a right to happiness, home, play and school. These NGOs include internationally renowned organisations such as CARE and Defence for Children International, as well as the largest global NGO network today, the Global March against Child Labour. CARE advances the following belief:

Childhood should be a happy time spent playing with friends, enjoying a favourite toy—even planning for the first day of school. But children in the developing world spend most of their childhood struggling to survive, without much hope for a secure, productive life.⁵⁵

Defence for Children International simply states: “No child should have to work”.⁵⁶ The Global March also maintains the ideal that a child (usually between 0 and 18 years of age) should not be an economic actor or shoulder the responsibilities and “sorrows” that come with full-time work. These parameters clash with the daily reality of the majority of children worldwide and depict their childhood experiences as largely an unhappy phase full of suffering, devoid of joy and lacking the carefree and protected zone of the home.⁵⁷ A number of well-known scholars studying the history of international law in the field of child labour from a critical perspective claim that such images bear the danger of de-legitimising and stigmatising working children’s childhood: when children who spend most of their time working or bearing responsibilities for siblings, cattle and so on are depicted as bereft of a “proper childhood”, the self-esteem they gain from these responsibilities and life skills learned are devalued.⁵⁸

The Global March against Child Labour is commonly considered to be the most influential global child work NGO network. This network has enjoyed the opportunity to participate in high-level conferences where child labour policies have been debated and designed, for example the preparation conferences for the

54. Jo Boyden and Deborah Levison, *Children as Economic and Social Actors in the Development Process*, Expert Group on Developmental Issues (Stockholm: Ministry for Foreign Affairs, 2000); Myers, “The Right Rights?”, *op. cit.*; Judith Ennew, “Why the Convention is Not about Street Children”, in Deirdre Fottrell (ed.), *Revisiting Children’s Rights* (The Hague: Kluwer Law International, 2000), pp. 169–182.

55. CARE on “Children and Poverty Campaign”, available: www.careusa.org/campaigns/childrenpoverty/index.asp (accessed 19 June 2012).

56. Defence for Children International, available: www.child-abuse.com/childhouse/childrens_rights/dci_what.html (accessed 19 June 2012).

57. Ebrima Sall, “Kindheit in Afrika—Konzepte, Armut und die Entwicklung einer Kinderrechtskultur”, in Karin Holm and Uwe Schulz (eds.), *Kindheit in Armut Weltweit* (Opladen: Leske + Budrich, 2002), pp. 81–101.

58. Antonella Invernizzi, “The Work of Children is Not Only Work”, in Liebel, Overwien and Recknagel, *op. cit.*, pp. 31–50; Alejandro Cussiánovich, “Childhood and Work: Two Key Cultural Points in a Process of Change”, in Liebel, Overwien and Recknagel, *op. cit.*, pp. 67–84; Miljeteig, *op. cit.*

latest ILO Convention No. 182 of 1999 in Oslo, Trondheim and Amsterdam. Even though Global March representatives did not directly participate in the negotiations on ILO Convention 182, their lobbying efforts are often seen as a major driver behind this “new” ILO Convention. At the most recent ILO conference in Den Haag in 2010, in fact, a spokesperson of the Global March was the only NGO representative able to speak in one of the conference’s high-level panel discussions.⁵⁹ Although this advocacy network has sustained claims that child workers were engaged in their advocacy activities, observers have portrayed the Global March as an organisation in which participation happens through “adult selection rather than child representatives”.⁶⁰ Critics of the Global March, such as Liebel, contend that it is dominated by perceptions of adult advocates without a child worker background, that it fails to facilitate child workers’ empowerment and that child workers’ own views, perspectives and experiences are clearly devalued.⁶¹

Resisting the attribution of identity: the transnational social movement of child workers

Towards the end of the 1970s, the first grassroots movements of working children and youth emerged in Latin America and, later, also in Africa and Asia. The primary rationale of these movements was to promote better working conditions, respect and participation. While some of these child worker movements are described as spontaneous self-organisations of working children on a rather small scale (one workplace, city or region), most of them have emerged with the help of adults (often former child workers) who support them in their struggle for recognition and rights. The role adults play in the formation and professionalisation of child worker organisations, however, is not described as advocacy, but rather as background support and consultancy geared towards the independent articulation and organisation of children’s interests.⁶² The financial resources for these organisations, which often have international structures with considerable outreach, come from different sources: child workers’ wages, solidarity funds, other NGOs and private foundations, membership fees or through the organisation of events.

During recent decades, a rather effective transnationalisation of these working children’s movements has taken place with the emergence of NATs in Africa and Asia, a growing World Movement for Working Children and Youth, which claims to act “as representatives for the working children of the world”,⁶³ and with several regional and international meetings of NATs during which child workers’ counter-discourses were remarkably strong. It was in the context of these meetings, in particular, that dominating international perspectives and

59. See ILO/Dutch Ministry of Social Affairs and Employment, The Hague Global Child Labour Conference 2010, “The Hague Conference Report”, p. 7, available: <http://www.ilo.org/ipecinfor/product/viewProduct.do?productId=14575> (accessed 31 January 2012).

60. Judith Ennew, “The History of Children’s Rights: Whose Story?”, *Cultural Survival*, Vol. 24, No. 2 (2000), pp. 44–48.

61. Manfred Liebel, “Working Children as Social Subjects. The Contribution of Working Children’s Organizations to Social Transformations”, *Childhood*, Vol. 10, No. 3 (2003), pp. 265–285.

62. ProNats, “Who Are NATs?”, available: <http://www.pronats.de/informationen/die-kinderbewegungen/kinderbewegungen/> (accessed 24 September 2012).

63. See <http://www.pronats.de/informationen/die-kinderbewegungen/die-weltbewegung/> (accessed 4 March 2013).

anti-child-labour policies were strongly criticised and rejected by child workers themselves. The main thrust of child workers' self-representation was their request not to be seen and treated as vulnerable, immature and helpless victims of exploitation or "passive recipients of protection and special services".⁶⁴ Instead, they demanded to be seen as social agents capable of taking responsibility for their own lives, holding opinions and making decisions. Their claim was, rather than being subsumed under the term "child labourers" and thus associated with the vulnerable, socially neglected and exploited child, for their positive life experiences as workers to be acknowledged. As Duncan Green, a British worker with the Catholic Aid Agency, reported after having spent several months with NATs in Latin America, "[w]orking gives them self-confidence, know-how and money to feed themselves".⁶⁵

Child workers' resistance towards identities attributed to them by NGOs and promoted in international forums has particularly centred on the inadequacy of policies (for example the supposed trade-off between child labour and education), their right to work, adequate security at the workplace (health) and, above all, their right "to be consulted in all decisions concerning us, at local, national and international level".⁶⁶ In various international meetings and resulting declarations, one of their main concerns was their inadequate opportunities for participation and consultation in international conferences and decision-making arenas:

We have decided to participate in the International Conferences in order to exercise our right to free expression; we also demand our full participation, including the right to vote, since matters which concern us are going to be discussed and decisions will be taken. Therefore, we must be protagonists in these Conferences.⁶⁷

In their claims to representation, child workers' organisations have also directly attacked other stakeholders, most importantly the Global March against Child Labour. While they counter-argued many of the Global March's underlying motivations, their strongest criticism of the Global March was that "[...] its organizers did not take us into account".⁶⁸

Child workers' organisations attack INGOs on the grounds that their offers of "empowerment" are often coupled with little respect for children's own interpretations and opinions. It is alleged that the right to participate and to have one's views respected often occupies a marginal position in the everyday work of NGOs doing advocacy for labouring children. Even though most child labour NGOs find it difficult *not* to speak in favour of child participation, "listening" to children often takes awkward forms. Frequently, children who speak

64. Miljeteig, *op. cit.*, p. 22 (original emphasis).

65. Green, quoted in Sophie Boukhari, "Child Labour: A Lesser Evil?", *UNESCO Courier*, May 1999, pp. 37–39, available: <http://unesdoc.unesco.org/images/0011/001158/115858e.pdf#115877> (accessed 25 June 2012).

66. Declaration of the 1st World Meeting of Working Children, Kundapur, India, 24 November–8 December 1996. See www.italianats.org/dichiarazioni.php?cid=170&lan=2 (accessed 12 August 2013).

67. Declaration of the World Meeting (1st Mundialito) of Working Children, Huampani, Peru, 10–14 August 1997, with representatives from Movimiento Latinoamericano de NATs, Mouvement Ouest Africain des EJT's, Bhima Sangha (India).

68. Declaration of African, Latin American and Asian Working Children's Movements in Dakar, Senegal, 1–4 March 1998.

are already among those who have been “rescued” by the organisation in question, leading to a selection bias. They also mostly give a narrative of their singular, tragic case rather than speaking on behalf of larger groups of working children.

Thus, working children’s self-representation, which is collectively channelled in various movements and organisations, fundamentally departs from the identities presented by global advocates participating in influential decision-making forums and events such as the Child Labour Conferences hosted by the ILO at the end of the 1990s. Increasing international visibility of NATs has challenged representations of local (i.e. Southern and Eastern) realities and the perceptions of child labour and child work that continue to dominate the policies of international institutions such as the ILO, the World Bank, the United Nations Children’s Fund (UNICEF) and other UN agencies, as well as international protectionist and abolitionist NGOs working in the proximity of these organisations.

The Sex Workers’ Case

International NGOs addressing prostitution largely grew out of transnational women’s movements against human trafficking. The issue of prostitution experienced additional international attention with the emergence of HIV/AIDS.⁶⁹ Outshoorn maintains that prostitution and trafficking issues had “returned to the political agenda of most post-industrial democracies by the end of the 1970s”, a “process accelerated by the emergence of HIV/AIDS in the mid-1980s”.⁷⁰ During this “second wave of feminism”, as it is often called, new groups within the women’s and feminist movement seized the issue, with many among them promoting a form of neo-abolitionism.⁷¹ Among these organisations, two major transnational alliances emerged during the 1980s and 1990s with sharply contrasting understandings of prostitution and adequate policy frameworks: the abolitionist US-based Coalition against Trafficking in Women (CATW) and the Thailand-based Global Alliance against Traffic in Women (GAATW), which promoted the distinction between forced prostitution and voluntary sex work.⁷² These conflicting advocacy perspectives have manifested themselves at various

69. Lisa Law, *Sex Work in Southeast Asia. The Place of Desire in a Time of AIDS* (London and New York: Routledge, 2000); Evelyne Micollier (ed.), *Sexual Cultures in East Asia. The Social Construction of Sexuality and Sexual Risk in a Time of AIDS* (London and New York: RoutledgeCurzon, 2004); Kamala Kempadoo, “Introduction: Globalizing Sex Workers’ Rights”, in Kamala Kempadoo and Joe Doezema (eds.), *Global Sex Workers. Rights, Resistance, and Redefinition* (New York and London: Routledge, 1998), pp. 1–28. However, it was also back in the 19th century that prostitution became an “issue” due to public debates about sexually transmitted diseases (Kempadoo, “Introduction”, *op. cit.*; Law, *op. cit.*, p. 1; Micollier, *op. cit.*).

70. Joyce Outshoorn, “Introduction: Prostitution, Women’s Movements and Democratic Politics”, in Joyce Outshoorn (ed.), *The Politics of Prostitution* (Cambridge, UK: Cambridge University Press, 2004), pp. 1–19, at p. 8; see also Mathieu, *op. cit.*

71. Joyce Outshoorn, “Comparative Prostitution Politics and the Case for State Feminism”, in Outshoorn, *The Politics of Prostitution, op. cit.*, pp. 265–292, at p. 277; Gunilla Fincke, *Trafficking in Women, and the UN. A Social Constructivist Frame Analysis of the International Attention to Trafficking from the Turn of the Century to the New “United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children” in 2000*, Unpublished MA Thesis, 2002.

72. Outshoorn, “Introduction”, *op. cit.*, p. 10; Kamala Kempadoo (ed.), *Trafficking and Prostitution Reconsidered: New Perspectives on Migration, Sex Work, and Human Rights* (Boulder and London: Paradigm Publishers, 2005).

Women's Conferences and UN policy-making events addressing issues of migration, trafficking and prostitution, such as the Beijing Conference in 1995 during the UN "decade on women" or the negotiations leading to the UN Protocol to prevent, suppress and punish trafficking in persons (adopted in 2000).⁷³ Yet women in prostitution themselves began to organise and establish their own interest groups at the same time.⁷⁴ This nascent prostitutes' social movement was also reflected in publicised self-representation of sex workers in the late 1980s, most notably Delacoste and Alexander's *Sex Work: Writings by Women in the Sex Industry*⁷⁵ and Pheterson's *A Vindication of the Rights of Whores*.⁷⁶

With sex workers, just as with child work, saying that the lines of contestation only run along identity issues resulting from the victim/agent divide would be rather simplistic. Grassroots organisations of child workers and sex workers have also been contesting other predominant narratives served by international advocacy NGOs, such as, most prominently, a narrow perspective on human rights which results in a one-dimensional coercion/consent dichotomy.⁷⁷ Still, the victim/agent juxtaposition has been the core issue around which a discourse of resistance has been organised. As shown above, the most fundamental effect of a victimisation perspective is its silencing effect on those for whom prostitution is a lived everyday experience and often not the most negative one they can imagine. Accordingly, sex workers' organisations commonly argue that it is this victimisation and stigmatisation that depicts all prostitution as a crime against women, rather than recognising that prostitution is first *work*, and then, in specific cases, should be denounced as criminal exploitation. Furthermore, even though sex workers' organisations repeatedly attack representations of them as vulnerable and helpless victims of mostly male aggression, they usually do not contest that they might be compelled to "sell sex" (through economic hardship, lack of alternatives, etc.). What they criticise is the exclusion of their opinions, views and experiences from decision-making and policy-making events and their marginal speaking position vis-à-vis powerful international NGOs through the overpowering characterisation of victimisation.

Attributing identities in the sex workers' case

Again similar to child labour, strong NGO networks closely linked to the UN and other large international institutions have expressed their abolitionist understandings of prostitution as modern, sexual slavery.⁷⁸ At the 49th session of the

73. Fincke, *op. cit.*; Kristina Hahn, *NGOs' Power of Definition. Identity Productions in Counter-Human Trafficking Discourse and the Debates on the UN Protocol*, Unpublished PhD Thesis, University of Bremen, 2008.

74. Gregor Gall, "Sex Worker Collective Organization. Between Advocacy Groups and Labour Union?", *Equality, Diversity and Inclusion: An International Journal*, Vol. 29, No. 3 (2010), pp. 289–304; Outshoorn, "Introduction", *op. cit.*, p. 9; Kuo, *op. cit.*

75. F. Delacoste and P. Alexander (eds.), *Sex Work: Writings by Women in the Sex Industry* (San Francisco: Cleiss Press, 1987).

76. Gail Pheterson (ed.), *A Vindication of the Rights of Whores* (Seattle: Seal Press, 1989).

77. B.E. Hernandez-Truyol and J.E. Larson, "Sexual Labor and Human Rights", *Columbia Human Rights Law Review*, Vol. 37 (2005–2006), pp. 391–445.

78. As Sandy demonstrates, these abolitionist NGO networks also had a strong impact on the Bush administration in the US and influenced the US's foreign aid policy on the issue. See Larissa Sandy, "Just Choices: Representation of Choice and Coercion in Sex Work in Cambodia", *The Australian Journal of Anthropology*, Vol. 18, No. 2 (2007), pp. 194–206.

Conference on the Status of Women (CSW), in March 2005, for example, the NGO-CSW Caucus on Violence against Women and Sexual Exploitation of Women stated the following:

Prostitution should not be recognised as a form of labour. Rather, it is a form of violence whose root cause is male demand for prostituted and other forms of commercialised sex and is rooted in gender inequality. [...] In its work towards achieving the Millennium Development Goals of gender equality, eradicating extreme poverty and combating HIV/AIDS, the caucus strongly urges Member States, the UN and civil society, to recognise prostitution as a form of violence against women and a form of exploitation to which consent of the victim is irrelevant.⁷⁹

Representatives of groups of prostitutes or sex workers rarely formed part of these advocacy coalitions. As Kuo reports, in certain cases the absence of sex workers' own opinions and voices was explained away by reference to their "false consciousness".⁸⁰

The Fourth Women's World Conference in Beijing in 1995 was the largest women's world conference to date, with over 30,000 women participating. However, although sex workers' organisations had planned to attend the NGO forum in Huairou, they were excluded from the official conference for two reasons. First, no sex workers' organisation had consultative status at the UN. Second, the Chinese government had been reluctant to provide sex workers with entry visas. Some sex workers still managed to participate, but only as members of the NGO Anti-Slavery International.⁸¹ Still, this afforded them the opportunity to advance their anti-abolitionist perspective⁸² and to counter-argue the victimising perspectives of many of their "advocates", among them the CATW.

During the negotiations leading to the adoption of the 2000 UN Protocol to prevent, suppress and punish trafficking in persons (accompanying the UN Convention against transnational organised crime) the conflicting perspectives led again to ardent controversy among the participating non-governmental actors. The International Human Rights Network (IHRN)—a group of abolitionist NGOs led by the CATW—struggled for a definition of trafficking to be included in the Protocol which defined all sexual exploitation (and prostitution) as trafficking even if the person consented (because this consent was considered irrelevant). In opposition to this, the Human Rights Caucus (HRC, a coalition including among others the GAATW) wanted to distinguish between forced and voluntary prostitution and maintained that the definition of trafficking should focus on servitude, forced labour and slavery-like practices.

The sex workers organised in the Network of Sex Work Projects (NSWP) refused the scope of the Protocol altogether. However, the NSWP finally decided that a

79. See Rachel Paul, Statement by the NGO-CSW Caucus on Violence against Women and the Sexual Exploitation of Women, 10 March 2005, available: http://www.observatorioviolencia.org/upload_images/File/caucus.pdf (accessed 25 June 2012).

80. Kuo, *op. cit.*, p. 20, fn. 7.

81. Fincke, *op. cit.*, pp. 44–46.

82. Jo Doezema, "Forced to Choose: Beyond the Voluntary v. Forced Prostitution Dichotomy", in Kempadoo and Doezema, *op. cit.*, pp. 34–50.

dual strategy should be pursued with strict opposition to the Protocol being expressed by the NSWP as a group (*inter alia*, expressed in a written statement before the negotiations) on the one hand, and with the participation of individual prostitutes' activists on the other, in order to ensure "damage-limitation".⁸³ The single activists who were taking part were not officially participating as prostitute activists, but were under the umbrella of other NGOs, such as Anti-Slavery International.⁸⁴ The (official) absence from the negotiations was partially due to the political opposition of the NSWP to the Protocol, but also due to the fact that only NGOs with Economic and Social Council (ECOSOC) consultative status were allowed to attend the meetings.⁸⁵ The prostitute activists' possibility of defending their own positions within the HRC network was limited. NSWP member Jo Doezema, for example, had to represent the anti-slavery position during the negotiations,⁸⁶ and the prostitutes' activists did not openly announce that they were prostitutes. Therefore, Doezema highlighted that the presence of the sex workers at the negotiations was almost invisible.⁸⁷ The definition of trafficking that was finally adopted in the Protocol constituted the first international definition of trafficking and therefore remains important today. The conflicts that took place during the conference in Beijing and during the Protocol negotiations are important examples of the conflict around trafficking which also took place on other occasions.

In the discourse on prostitution and trafficking by CATW, expressed in their documents and drafts for example during the Protocol negotiations, we find many characteristics identified in the discourse of some NGOs targeting child work. Women and girls working as prostitutes are portrayed as helpless and vulnerable victims marginalised by society.⁸⁸ CATW does not distinguish between "voluntary" and "forced" prostitution since, for CATW, prostitution is always degrading as it deprives "women and children of their human dignity".⁸⁹ CATW emphasises that women prostitutes are very poor, and women's slavery

83. This can be seen as a combination of a "blocking" mechanism and a "backdoor move" in Hertel's terms. With their statement against the adoption of the Protocol, the NSWP group tried to change the whole NGO campaign, whereas through participation in the negotiations and the lobbying of single state delegates, single NSWP members engaged in "backdoor moves". However, as mentioned in footnote 13, our theoretical approach in this article is different from Hertel's. We do not consider the activists as mainly strategic actors, but believe they are embedded in a discursive environment which ascribes certain identities to them. The actors do not choose freely which strategic action to undertake but are enabled and restricted by the roles and identities they have within a certain discursive terrain. For a deeper analysis of the identities and roles that were ascribed to the prostitutes also by their NGO allies during the Protocol negotiations, see Hahn, *op. cit.*

84. Interview with a representative of a member organisation of HRC/GAATW, Berlin, 11 June 2006, p. 14, quoted in Hahn, *op. cit.*

85. Jo Doezema, *Sex Slaves and Discourse Masters. The Historical Construction of Trafficking in Women*, Unpublished PhD Thesis, Institute of Development Studies, University of Sussex, 2004, p. 173; see also Jo Doezema, *Sex Slaves and Discourse Masters. The Construction of Trafficking in Women* (London: Zed Books, 2010).

86. Interview with a representative of a member organisation of HRC/GAATW, Berlin, 11 June 2006, p. 14, quoted in Hahn, *op. cit.*

87. Jo Doezema, "Now You See Her, Now You Don't: Sex Workers at the UN Trafficking Protocol Negotiations", *Social and Legal Studies*, Vol. 14, No. 1 (2005), pp. 61–89.

88. See also Sandy, *op. cit.*; Hahn, *op. cit.*

89. Coalition against Trafficking in Women (CATW), *Coalition Asia-Pacific Report*, Vol. 4, No. 2 (November 1998), p. 8.

“bonds are not shackles of iron, but poverty”.⁹⁰ The slavery reference clearly evidences the CATW view that prostitution is never the result of free choice. Moreover, CATW emphasises the commonality of sexual abuse before becoming a prostitute (for CATW, sexual abuse is a major factor leading to trafficking and prostitution),⁹¹ strengthening the victimisation discourse and the allegation that drug abuse among victims is widespread.⁹²

CATW’s framing of the situation (extreme poverty, previous abuse and drug addiction) writes any free choice of women out of the story. Similarly, when CATW does give prostitutes the opportunity to speak, or cites them in publications, it is typically women who have already left prostitution. These women also do not formulate abstract political claims on behalf of a larger group but report their tragic, individual experiences.⁹³ Images of the suffering, humiliated and helpless prostitute, incapable of self-determination or self-representation, have served as forceful ethical impetus for “altruistic” NGOs advocating either abolition or alleviation of these women’s situation.⁹⁴

Resisting the attribution of identities

International networks and movements of sex workers have had a longer history than those of NATs.⁹⁵ Both before and simultaneously with the feminist organising against trafficking during the 1980s in several countries (especially in North America and Western Europe), women had already started to organise prostitutes’ rights groups nationally. Examples of these groups include COYOTE in San Francisco founded by the famous prostitutes’ rights activist Margot St James in 1973, de Rode Draad in Amsterdam (1984) or HYDRA in West Germany (1983). The International Committee for Prostitutes’ Rights held two international conferences, the first and second “World Whore Congresses” in Amsterdam in 1985 and Brussels in 1986.⁹⁶ The First World Whore Congress resulted in a “World Charter on Prostitute Rights” and the foundation of the International Committee for Prostitutes’ Rights (ICPR). The Second World Whore Congress, organised by the ICPR, took place in the European Parliament buildings in Brussels on the invitation of the “Rainbow Group” of the European Greens.⁹⁷

During the 1980s and 1990s, the transnationalisation of sex workers’ groups went on, spreading from the United States and Europe to other parts of the world, particularly Asia.⁹⁸ Today, global networks of sex workers’ organisations

90. Coalition against Trafficking in Women (CATW), *Coalition Asia-Pacific Report*, Vol. 3, No. 1 (March 1997), p. 2.

91. *Ibid.*

92. Coalition against Trafficking in Women (CATW), *Coalition Asia-Pacific Report*, Vol. 4, No. 2 (November 1998), p. 10.

93. For example, *ibid.*, p. 4.

94. Doezema, *Sex Slaves and Discourse Masters*, *op. cit.*; Kempadoo, “Introduction”, *op. cit.*, p. 11; J. Liddle and S. Rai, “Feminism, Imperialism and Orientalism: The Challenge of the ‘Indian Woman’”, *Women’s History Review*, Vol. 7, No. 4 (1998), pp. 495–520, at p. 512.

95. For a directory of sex work organisations, see www.chezstella.org/stella/?q=mouvement (accessed 25 June 2012).

96. Pheterson, *op. cit.*

97. *Ibid.*, p. 43 *et seq.*

98. Kempadoo, “Introduction”, *op. cit.*, pp. 1–2.

have consolidated and continue to grow. The two most important global networks are the International Union of Sex Workers (IUSW) and the Network of Sex Work Projects (NSWP). The NSWP was established as an informal alliance in 1990 by a group of sex worker rights activists working within sex work projects around the world. Following an organisational review in 2007, the NSWP formalised its membership structure, becoming a network of organisations (rather than individuals)⁹⁹ with member organisations coming from around the globe, organised in regional branches. Sex workers' organisations have emerged in response to the NGOs mentioned above. They have persistently demanded to be recognised and respected as *sex workers* rather than prostitutes. Already this choice of terminology underlines the fact that the sex workers' groups locate their struggle for recognition within a discourse on social and economic rights. They consider themselves to be part of labour movements of those who exert marginalised and ill-paid professions. In their self-representation, the terminology "sex workers" stresses the "social location of those engaged in sex industries as working people".¹⁰⁰

Kuo claims that, despite a multiplicity and diversity of voices, sex workers' organisations have "done an extraordinary job of developing a global lobby that attempts, as far as possible, to speak as one policy voice".¹⁰¹ Three primary goals are largely shared by all networks, unions and organisations of sex workers: (1) that sex workers be included in debates about their life experiences and work situation;¹⁰² (2) that sex workers' work is accepted as such and, thus, that sex workers should have labour rights equal to all other professions; and (3) that sex workers are socially accepted and respected for their work:

From our local experience, we find no difference between people working as factory workers, domestic workers, sex workers, or people wanting to marry abroad. [...] Only when we accept sex work as a job, actively engage with the lives of women in the sex industry, we may understand the unfairness of current sex transactions and enable sex workers to gain legal protection....¹⁰³

Opposing a victimising view on prostitution and affected women, sex workers' organisations strive to diversify their identity, shedding light on the motives by which they came to *choose* prostitution as an income-generating activity. Rather than presenting a prostitute's fate as a situation in which she found herself either through coercion or through false consciousness (victimisation), sex

99. See <http://www.nswp.org/page/history> (accessed 8 October 2012). Following this review, in October 2008 the NSWP registered as a not-for-profit private company with its registered office in Scotland.

100. Kempadoo, "Introduction", *op. cit.*, p. 3.

101. Kuo, *op. cit.*, p. 22.

102. See European Conference on Sex Work, Human Rights, Labour and Migration and the Sex Workers in Europe Manifesto, available: www.sexworkeurope.org/sites/default/files/userfiles/files/join/manbrussels2005.pdf (accessed 19 June 2012).

103. Yim Yuet-Lin and Anita Koo, for ZiTeng, an NGO established to provide much-needed services to Hong Kong and mainland Chinese sex workers (Kamala Kempadoo, "Sex Workers' Rights Organizations and Anti-Trafficking Campaigns", in Kempadoo, *Trafficking and Prostitution Reconsidered*, *op. cit.*, pp. 149–155, at p. 151).

workers contend that prostitution is a “legitimate work decision for adults, be it a decision based on choice or necessity”.¹⁰⁴

Resistance towards dominant constructions of *all* prostitutes as victims of forced exploitation and gendered power asymmetries has become visible in various events and forums. Among those who have most actively fought for greater involvement of sex worker organisations in international policy-making events, especially UN venues, is the NSWP. The NSWP claims that “[m]any sex workers feel that it is time to demand that we are heard in such a significant international forum”.¹⁰⁵

Sex worker organisations’ resistance to the dominant constructions of their identity by many advocacy NGOs has been most clearly articulated in their various manifestos and other public statements. One of their fundamental complaints is that their identities are only incompletely represented in official discourses and their roles in society neglected. Prostitutes’ groups refuse to be seen as “forced” and “victims”, and maintain that this image only mirrors the moral position that sexual services should not be sold.¹⁰⁶

While striving for the social recognition and legal protection of their employment, sex workers have clearly demonstrated awareness of the exploitative, criminal dimensions of their occupation. As such, they also support human rights frameworks calling for universal protection from exploitation. Indeed, they see the differentiation between criminal exploitation and legitimate sex work as a dangerous distinction; one that grants protection to the victimised prostitute while denying the same protective measures to the voluntary sex worker.¹⁰⁷ Accordingly, sex workers’ organisations see sex workers’ identities as located within the broader call for the recognition of social and economic rights. They desire, above all, the right to work in the commercial sex industry, health and safety in employment, and general legal protection of and within their work situation.

Conclusion

NGOs and their networks enjoy increasing access to, and credibility in, international policy- and decision-making processes. It is often assumed that international NGOs bring into international decision-making forums the voices of

104. See International Committee for Prostitutes’ Rights, *World Charter for Prostitutes Rights* (Amsterdam, 1985) (Pheterson, *op. cit.*, p. 40). There is a wide discussion on the legitimacy of necessity and one’s right to subsistence, also from a feminist and human rights perspective. This also relates to the question of the extent to which one could exercise agency in the context of an abusive situation. Authors such as Goodhart argue in favour of a “right to guaranteed subsistence” and states’ responsibility for providing basic income. Following his argumentation nobody would be forced to take a decision based on necessity and women would have better opportunities to remove themselves from situations of domination. We think that the Prostitutes’ Committee in this quote primarily emphasises their viewpoint that prostitution is a “legitimate work decision” for them—like the decision to work in other professions which may also be due to economic necessity. Although we take note of the important debate on the legitimacy of necessity in general, we cannot pursue this argument further in our article. Michael Goodhart, “None So Poor That He Is Compelled to Sell Himself: Democracy, Subsistence, and Basic Income”, in Shareen Hertel and Lanse Minkler (eds.), *Economic Rights. Conceptual, Measurement, and Policy Issues* (Cambridge, New York, Melbourne, Madrid, Cape Town, Singapore, Sao Paulo and Delhi: Cambridge University Press, 2007), pp. 94–114.

105. NSWP, quoted in Kuo, *op. cit.*, p. 21.

106. NSWP, “Sex Work and Human Rights. European Symposium on Health and the Sex Industry”, available: www.bayswan.org/NSP.html (accessed 19 June 2012).

107. Kempadoo, “Introduction”, *op. cit.*

those who could otherwise not be heard, particularly marginalised people incapable of self-representation. But the increasing visibility, publicity and transnationalisation of grassroots movements of those on whose behalf activism is undertaken presents a challenge to many international advocacy NGOs' authority and legitimacy. Both case studies have discussed evidence for this contestation of advocacy and representation. In both cases, the abolitionist NGOs on which our analysis focused are driven by a pronounced moral attachment to one specific ideal of childhood or sexuality strongly associated with the validation of the family as a social sphere to be placed outside of the market rationality. This ideal is especially developed in Western countries with regard to the child work issue.

Frequent invocation of the need to rehabilitate, re-integrate and repatriate suggests that many advocacy organisations conceive of child workers or prostitutes as living *outside* a normal societal environment, family context or community. This particularly applies to child work which is often considered *abnormal* and *illegitimate*. NGOs are unwilling or incapable of perceiving child work as a lived reality with both negative *and* positive effects, particularly with regard to social status, self-esteem, material subsistence and the acquisition of skills. Those concerned are portrayed not only as weak and marginalised, but also largely irresponsible (in the sex workers' case this portrayal is based on sex workers' alleged prior abuse or drug addiction).

Discourses on, and identities attributed to, child workers and prostitutes show similar characteristics, as do their struggles of resistance and for recognition. Advocacy beneficiaries demand to be their own representatives and insist on their capacity to make adequate life choices. Both struggles thus revolve around the question of "free will" and its denial for those marginalised by society. Our analysis has also shown that the growing international recognition of the imperative of participation and empowerment—as, for example, enshrined in the UN Convention on the Rights of the Child—has, on the one hand, induced many charitable organisations working to abolish child labour to engage more in advocacy activities. On the other hand, this acknowledgement of the valuable voice of their "beneficiaries" continues to confront them with a severe identity crisis in terms of balancing their protective mandate vs. policies aimed at participation and downward accountability. In the case of prostitution, we even observe a confrontation between those NGOs that place an emphasis on human rights and participation and other groups that highlight the vulnerability (or even "false consciousness") of their "beneficiaries" (and our analysis focused on the latter group). As we have sought to show through our comparison of two prominent fields of advocacy, many influential Northern NGOs and advocacy networks are torn between the necessity to sustain their own relevance by endorsing discourses on victimhood, marginalisation and voicelessness, and the inevitability of recognising the global prominence of principles of participation and emancipation that seek to restore the agency of seemingly silent victims of human rights violations.

The purpose of this article was to point to the significant representational power conferred to such NGOs that are established cooperation partners in global governance institutions and to show that such power becomes particularly visible where it is openly and actively contested. However, it was not our intention to espouse a normative perspective that allows a neat judgement on which non-

state actors are more legitimate representatives of people, interests and world-views. While the intention lying behind this article was to problematise representative power and to point to fields of contestation revolving around political representation, we do not conclude that such contestation points *per se* to a lack of legitimacy on behalf of international advocacy NGOs. Rather, our findings call for more empirical evidence regarding the different pathways through which advocacy NGOs respond to criticisms of biased representation, particularly the link between representative power and structures/mechanisms of accountability.¹⁰⁸ In this regard, the scientific engagement with NGOs that claim to act as “facilitators” for grassroots movements by providing the material (funds) and immaterial means (networks, know-how) that enable participation in a global public sphere seems particularly warranted, as these NGOs may also exert considerable gatekeeping power the more they operate in a transnational environment. In our article, however, we have focused on the extreme ends of our actor typology in order to establish the fields of tension that build around representation in global governance institutions. To include a thorough analysis of the actor category of “facilitator” would have exceeded the scope of this article. The empirical insights presented in this article suggest that the identification of constituencies (such as child workers and prostitutes) as extremely powerless, victimised and voiceless serves to buttress legitimate foreign representation by NGOs and that in order to safeguard legitimacy gained through representation, advocacy NGOs may be compelled to keep their constituencies from claiming their own voice in international political forums.

108. Holzscheiter, “The Representational Power”, *op. cit.*; see also Robert O. Keohane, “Global Governance and Democratic Accountability”, in David Held and Mathias Koenig-Archibugi (eds.), *Taming Globalization: Frontiers of Governance* (Cambridge, UK: Polity, 2003), pp. 130–160, at p. 148.