

● LIFE OF SEX WORKERS DURING COVID-19: PAIN AND GRIEF



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Abstract

"One can hear all that's going on in the street. Which means that from the street one can hear what's going on in this house."

-Jean Genet, The Balcony

As the coronavirus spreads in the world, it threatens in multiple ways to sex workers. This virus has destroyed the only job of sex workers. They are forced to live in fear of covid-19. This covid-19, a pandemic, has dramatically changed the social life of human being. Sex workers are also part of society and the healthy life is their right too, like another human. The constitution of India has enshrined numerous rights within it for their people and right to equality is one of them. Irony is that even though sex workers are citizen of this country although their basic human rights are not protected by the government. They are neglected, discriminated and helpless. Apart from constitution of India, Indian legislature has also adopted bundle of laws, to protect the rights of sex workers, like ITPA etc. even though their rights are not protected. In this war like situation they are left alone to feel the pain of grief.

Key words

Covid-19, Pandemic, Sex workers, ITPA, Human rights.

WHAT IS A COVID-19?

The disease covid-19 emerges suddenly in 2019-20 from China's Wuhan city and spread to whole of the globe suddenly which has created confusion about the meaning of the word "pandemic". This covid-19 causes millions of deaths and number is going on. Health sector has destroyed by covid-19 very badly. All the governmental as well as non-governmental organisation are fighting to control this deadly virus which has now taken the shape of pandemic³.

There are several human corona viruses like as other types of human viruses. Before this corona virus there were only six type of corona virus which could affect human body but covid-19 is specific corona virus which is liable the current pandemic. It is seventh one

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³A Pandemic is an epidemic occurring on a scale which crosses international boundaries, usually affecting large number of people. Pandemic can also occur in important agricultural organisms or in another organism for example Smallpox, tuberculosis. The only current pandemic was HIV/AIDS which started in the 1980 but now covid-19 has also joined it.

and latest that is why also known as novel corona virus. In February 2020 World Health Organization has given a name to this novel corona virus that is 'Severe Acute Respiratory Syndrome Coronavirus-2'⁴. Covid-19 is the name of the respiratory disease caused by 'SARS-CoV-2'.⁵

This covid-19 outbreak is not first pandemic for the world, throughout the history there have been many pandemics has been recorded like smallpox, tuberculosis and black death which had killed more than seventy-five million people. The Spanish flu which was occurred in 1918, caused by H1N1 virus, killed more than fifty million people worldwide. Before this covid-19, only active pandemic was HIV/AIDS, which has also caused millions of deaths.

WHO IS SEX WORKER?

The term "sex worker" was first time introduced by Carol Leigh in 1978⁶ and become popular in mid-1978.⁷ According to Oxford English Dictionary "sex worker" means 'a person who works in sex industry'.⁸ In India the terms "sex worker" and "prostitute" are used as synonymous to each other. "Sex worker" is conceived as a non-stigmatizing term, without the taint of the word's 'whore' and 'prostitute'. This term shows the professionalism of the sex worker rather than lack of worth as seen by society.

The term "Sex work" has been defined as the provision of sexual services for money or goods and "sex worker" has been defined as women, men or transgender people who receive money or goods in exchange for sexual services, and who consciously define those activities as income generating even if they do not consider sex work as their occupation.⁹

The term prostitute (sex worker) was defined in *Emperor v. Lalya Babu Jadhav*¹⁰, Justice Mirza explained so in the following words:

"The idea underlying prostitution was that a woman should surrender her body for a monetary consideration to someone not legally entitled to have sexual intercourse with her." Immoral Traffic Prevention Act, 1986 terms 'prostitute' is a gender-neutral term and males as well as females both are included under it since incidents of male sex workers do not reported that much hence this article will mainly focus upon females as sex workers.

⁴Hereinafter 'SARS-CoV-2'.

⁵Hereinafter WHO.

⁶Carol Leigh coins the term sex work, GLOBAL NETWORK OF SEX WORK PROJECTS, (June 26, 2020, 11:15 AM) <https://www.nswp.org/timeline/event/carol-leigh-coins-the-term-sex-work>.

⁷Its use became popularized after publication of the anthology, *Sex Work: Writings by Women in The Sex Industry* in 1987.

⁸Oxford English Dictionary, second ed. 1989.

⁹Cheryl Overs, *Sex Workers: Part of The Solution, An Analysis of HIV Prevention Programming to Prevent HIV Transmission During Commercial Sex in Developing Countries 2* (2002), (June 29, 2020, 10:13 PM) http://www.who.int/hiv/topics/vct/sw_toolkit/115solution.pdf. Last visited on 11-06-2020.

¹⁰*Emperor v. Lalya Babu Jadhav*, AIR 1929 Bom 266.



COVID-19 AND ITS IMPACT UPON SEX WORKERS:

This is one of the most pathetic time of human civilization. Each and every class of society are losing their job, business and other means of livelihood. This covid-19 pandemic has made everyone's life vulnerable. People are fighting for their survival. Every country imposing lockdown to break the chain of covid-19infection. Sometime it looks like the world is going to be end. In such pathetic time government of all the nations are coming forward and helping their vulnerable classof people but there is one vulnerable class which is not getting attention from their government that is sex workers. Either they are totally neglected or getting very little help from their government. There are very few sex workers who are doing this work because of their choice and free will and most of the sex workers join this work due to some force or coercion and many of them do it for looking after their families. In this global pandemic sex workers are finding them self isolated and helpless. It is very hard to find out the exact number of sex workers but according to the Joint United Nations Programme on HIV and AIDS there are more than 6.5 million active sex workers in India.¹¹ However unofficial figures place these numbers far higher.

According to report submitted by the International Committee on the Rights of Sex Workers in Europe¹² sex workers are living in the "economic margins" and often have less savings and government support to fall back on. They are also rarely getting benefit from pandemic response and recovery plans.¹³

Sex workers are totally depending upon their work to provide sexual services to customer which is also known as prostitution. Physical contact is one of the essential terms of their work and as known to all covid-19 spread by physical contact which makes their work perilous. During this global pandemic when government has asked to their people to stay in home and follow the social distancing norms but sex workers are force to work due to lack of support from government and putting their life in peril. Sometime it becomes hard to get customer due to covid-19 infections fear they are force to beg. According to a study done by Harvard Medical School and the Yale School of Medicine there could be over 400,000 infections and 12,000 deaths among red light area in the next one year if they are reopened.¹⁴ Most of the sex workers are forced to live in red light area which are very crowded and makes nearly impossible to keep social distancing.Redlight area provides desirable environment to covid-19to spread easily.

In this covid-19 pandemic period they are depriving from their basic right like right shelter, right to food, right to medical assistance and many more other important rights.

¹¹Key Population Atlas, UNAIDS (July 3, 2020, 10:30 PM)<https://kpatlas.unaids.org/dashboard>.

¹²Hereinafter ICRSWE.

¹³Preeja Prasad, Dosas, fish, flowers: Sex workers look to other means of livelihood amid COVID-19 pandemic, THE NEW INDIAN EXPRESS, (July 8, 2020, 10:30 PM), <https://www.newindianexpress.com/states/karnataka/2020/jul/08/dosas-fish-flowers-sex-workers-look-to-other-means-of-livelihood-amid-covid-19-pandemic-2167105.html>

¹⁴Prashasti Awasthi, If reopened, there could be over 400,000 Covid-19 infections red-light areas in India: Report, THE HINDU BUSINESS LINE(July 5, 2020, 11:30 PM),<https://www.thehindubusinessline.com/news/if-reopened-there-could-be-over-400000-covid-19-infections-red-light-areas-in-india-report/article31943976.ece>. Last visited on 11-06-2020.

The Supreme Court of India in *Olga Tellis case*¹⁵ recognised right to livelihood as fundamental right which comes under the aegis of Article 21¹⁶ of constitution of India and Supreme Court also held that Right to life doesn't mean merely animal existence but living with human dignity.¹⁷

Sex workers are also the citizen of India and Apex Court of India in *Budhadev Karmaskar Vs. State of West Bengal*¹⁸ clearly manifest his opinion in this regard and accepted the same. Recently a PIL was filed in Delhi High Court to exempt sex workers from rent to ease their hardships. The Delhi High Court dismissed the petition and said that the central and state governments have already brought out several schemes and "the persons for whose benefit this petition has been filed are also entitled to such schemes and the benefit of the directions and it is not the case that they are being discriminated against".¹⁹ In nutshell sex workers has same fundamental and constitutional right as the other citizen of India inherent.

INDIA'S ANTI-SEX WORKERS LEGAL REGIMES

India is a signatory to numerous international agreements on the rights of woman²⁰ and also given very special protection under its constitution like article 14²¹, 15(3)²², 19(1)(g)²³, 21²⁴, 23(1)²⁵, 39(e)²⁶ and 39(f)²⁷. In addition, there are statutory provisions that guarantee these rights, such as the 1976 Equal Remuneration Act and the 1976 Maternity Benefit Act and many provisions of Indian Penal Code 1860, but somewhere government failed

¹⁵*Olga Tellis v. Bombay Municipal Corporation and others*, AIR 1986 SC 180.

¹⁶INDIAN CONST. art 21, "No person shall be deprived of his life or personal liberty except according to procedure established by law."

¹⁷*Francis Coralie Mullin V. The Administrator, Union Territory of Delhi & others*, AIR 1978 SC 597.

¹⁸*Budhadev Karmaskar Vs. State of West Bengal*, 15 Sep. 2011: CRIMINAL APPEAL NO. 135 OF 2010.

¹⁹*Anurag Chauhan v. Union of India*, 2020 SCC Online Del 584.

²⁰More than 20 international human rights agreements have been signed by India, including the twin International Covenants on Civil and Political Rights and Economic, Social and Cultural Rights and the Convention on the Elimination of All Forms of Discrimination Against Women.

²¹*Supra* note 16. art 14, "The State shall not deny to any person equality before the law or the equal protection of law within the territory of India".

²²*Id.* art 15 cl. (3), "Nothing in this article shall prevent the State from making any special provision for women and children".

²³*Id.* art 19 cl.(1)(g), "Right to practice any profession, or to carry on any occupation, trade or business."

²⁴*Id.* art 21, "No person shall be deprived of his life or personal liberty except according to procedure established by law."

²⁵*Id.* art 23 cl. (1), "Traffic in human beings and beggar and other similar forms of forced labour are prohibited and any contravention of this provision shall be an offence punishable in accordance with law."

²⁶*Id.* art 14, 39 cl. (e), "The health and strength of workers, men and women, and the tender age of children are not abused and that citizens are not forced by economic necessity to enter avocations unsuited to their age or strength."

²⁷*Id.* art 39 cl. (f), "That children are given opportunities and facilities to develop in a healthy manner and in conditions of freedom and dignity and that childhood and youth are protected against exploitation and against moral and material abandonment."



to protect the right of woman specially sex workers. According to Jeremy Bentham, an English philosopher, the purpose of law is 'minimising the pain and maximising the pleasure' but when the same law started vice-versa then it became necessary to expose the bad element of law and raise the such issue before the authority for correction. In the case of sex workers, the exact same thing happens, the law which mean to protect them has become tool of harassment. This section is going to discuss how Indian law on sex workers which mean to protect their right now haunting them.

Global World had adopted mainly two approaches toward the sex workers, first one considered sex work as immoral and sex workers should be forcible remove from sex industry and restraints on entry into sex work and according to second approach sex work should be legalised so that sex workers rights can be recognised as other workers.²⁸ India has adopted mixed approached toward the sex work.²⁹ On the One hand Indian legal regimes considered that sex work is immoral, that the sex work is exploitative, and on the other hand it considered sex workers rights need to be protected.³⁰

The name of the major legislation relating to sex work in India is the Suppression of Immoral Traffic in Women and Girls Act, 1956³¹ with the very purpose of protecting the right of sex workers in India. This act was passed in pursuant to the 1949 United Nations Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others. This same convention advocates abolishing sex work but SITA does not make sex work illegal in India and allow it if sex work is practice privately and independently.³² The main reason behind not criminalising sex work in India is article 19 of Indian constitution which gives freedom to practice an occupation of choice.³³ The SITA was amended in 1986 to enhance certain penalties and renamed as the Immoral Trafficking (Prevention) Act of 1986.³⁴ Its aims, objectives, logic and premises remain fundamentally unchanged. The Act continues to remain heavily weighted against the sex workers and lacks any serious attempt to give teeth to the implementation structure.

As discussed earlier, sex work is not illegal in India but criminalizes many of the activities necessary in order to do sex work. This act punishes anyone maintaining a brothel,³⁵ living off the earnings of prostitution,³⁶ procuring or detaining a woman for the sake of prostitution,³⁷ and seduction of a person in custody.³⁸ The Act also punishes any

²⁸Geetanjali Mishra, Ajay Mahal, et.al., Protecting the Rights of Sex Workers: The Indian Experience 5(1) Health and Human Rights 95 (2000).

²⁹Id.

³⁰Id.

³¹Hereinafter SITA

³²Suppression of Immoral Traffic in Women and Girls Act 1956 § 7,8.

³³Supra note 16. art 19 cl. (g), "Right to practice any profession, or to carry on any occupation, trade or business."

³⁴Hereinafter ITPA.

³⁵Immoral Trafficking (Prevention) Act 1986, Section 3

³⁶Id., Section 4

³⁷Id., Section 6

³⁸Id., Section 9

person who solicits or seduces for the purpose of prostitution³⁹ or who carries on prostitution in the vicinity of public places.⁴⁰ Moreover, Section 15 allows the police to conduct raids on brothels without a warrant, based on the mere belief that an offense under the ITPA is being committed on the premises.

This act was made for the protection of sex workers but it has many ill effects too. ITPA has given lots of discretionary power to police and police is using it in very negative manner. They use ITPA as legislation to harass sex workers, demand unnatural favour and money etc. According to report commissioned by the National Human Rights Commission found that the soliciting statute was the primary law used in ITPA and observed, "It is disturbing to note that out of almost 14,000 persons arrested every year under ITPA, approximately 90% are women."⁴¹ Rescue and rehabilitation is one of important aspect of ITPA act but irony is that on the name of rehabilitation sex workers treated violently and kept in jail like condition. This act does not allow to maintain brothel and police has power to raid any time brothel⁴², which itself violating the right to privacy.⁴³ Another most criticised provision of ITPA is section 20.⁴⁴ According to this section, a magistrate can order the removal of a prostitute from any place within his jurisdiction if he deems it necessary to the general interest of the public.⁴⁵

The Contagious Diseases Act of 1864, which legislated mandatory testing of sex workers for venereal disease and restricted their movement and practice to specifically allocated areas, offers one example of conferring a "legal" status on sex work.

As is clear from the above discussion the Indian government's approach has not been very successful in protecting the rights of sex workers or improving their condition even in normal circumstances, now imagine their condition during this covid-19 pandemic. This pandemic has shaken every class of society. Sex workers belong to vulnerable category and already lost their faith in Police and other governmental authority which makes their life more vulnerable in this pandemic.

HUMAN RIGHTS LAW RESPONSE TO SEX WORKERS IN THE TIME OF COVID-19

Human rights law emphasises that all human rights are inalienable, universal,

³⁹Supra note 35, Section 8

⁴⁰Id., Section 7

⁴¹National Human Rights Commission, "A report on trafficking in women and children in India 2002-2003"(2002-2003).

⁴²Supra note 35, Section 15

⁴³In Justice K. S. Puttaswamy (Retd.) and Anr. vs Union of India And Ors. Writ Petition (Civil) No 494 of 2012., In this case Supreme Court of India has declared that Right to privacy is Fundamental Right.

⁴⁴State of Uttar Pradesh v. Kausalya, AIR (1964) 4 S.C.R. 1002. In this case, six appeals, filed before the Full Bench of five Justices of the Supreme Court by the state government of Uttar Pradesh, raised the question of the contravention of these constitutional provisions by Section 20 of SITA the Supreme Court did not agree with the High Court and set aside its judgment, holding that restrictions imposed by Section 20 are "... reasonable restrictions imposed in the public interest."

⁴⁵Supra note 35, Section 20



interdependent and indivisible.⁴⁶ Anyone can claim them and it is obligation of the government to provide them without any discrimination, including, indeed especially, in times of emergency like covid-19. There may be some limitation upon the rights but such limitation cannot be arbitrary and without due process of law. Whenever any pandemic introduced in the society, it becomes duty of government to protect those people who are vulnerable in our case sex worker and as human rights law mandates government are duty bound too.

Following are some important rights of sex workers which are must be protected in response to covid-19:

Right to Life, Liberty and Security

Right to Life, Liberty and Security is a fundamental right guaranteed to all persons including the sex workers under various international instruments. Article 3⁴⁷ of the Universal Declaration of Human Rights expressly provides that everyone has the right to life, liberty and security. Again, Article 6⁴⁸ of the International Covenant on Civil and Political Rights provides that every human being has the inherent right to life and this right shall be protected by law and cannot be arbitrarily deprived of. Article 9⁴⁹ of the same convention also provides that everyone has the right to liberty and security of person. Article 6⁵⁰ of the Convention on the Rights of the Child expressly upholds that every child has the right to life and thus provides protection to the children of sex workers.

Right to Participation

Participation is one of the fundamental principles of human rights. All government policy and action must allow for the direct and meaningful participation of communities, specially who are affected and most vulnerable, which presupposes transparency in information and decision-making. Only then government policy and response will reach to venerable class. The right to participation is recognised in the International Bill of Human Rights for instance article 25⁵¹ of ICCPR.

Right to Equality and Non-Discrimination

Governments must refrain from acting in a manner that either directly or indirectly discriminates against individuals or groups, including avoiding unintended

⁴⁶OHCHR, what are human rights? 8:30PM),<https://www.ohchr.org/en/issues/pages/whatarehumanrights.aspx>. Last visited on 12-7-20

⁴⁷Universal Declaration of Human Rights, art. 3" Everyone has the right to life, liberty and security of person", [hereinafter UDHR]

⁴⁸International Covenant on Civil and Political Rights, art. 6 para 1. "Every human being has the inherent right to life. This right shall be protected by law. No one shall be arbitrarily deprived of his life." [hereinafter ICCPR]

⁴⁹Id., art. 9 para 1. "Everyone has the right to liberty and security of person..."

⁵⁰Convention on the Rights of the Child, art. 6 para,1 "States Parties recognize that every child has the inherent right to life.",[hereinafter CRC]

⁵¹Supra note 48, art. 25, "Every citizen shall have the right and the opportunity, without any of the distinctions mentioned in article 2 and without unreasonable restrictions...."

consequences of policies and programmes and protecting against third party discrimination. Article 1⁵² of the UDHR provides that all human beings are born free and equal in dignity and rights. This puts displaced persons at par with other human beings with respect to having a dignified life.

Discriminatory rights can be effectively used to protect the rights and interests of the people particularly the sex workers who are more vulnerable among the world population. The UN Charter seeks to achieve international assistance in solving international problems and promoting human rights and fundamental freedom for all without any distinction as to sex, race, language or religion as among one of the purposes of UN under article 1 paragraph 3⁵³ of the UN Charter. This was also further upheld under article 2⁵⁴ of UDHR and again recognized under article 2, paragraph 1 of the ICCPR. Besides it, right against discrimination forms the fundamental code in the Convention on the Elimination of All Forms of Discrimination against Women where Article 1⁵⁶ intricately defines discrimination against women and article 2⁵⁷ imposes obligation upon the state parties to condemn discrimination against women in all its forms. Special protection against discrimination can be also provided to the sex workers children under Article 2⁵⁸ of the CRC.

Right to Freedom of Residence

Right to freedom of residence within the borders of each state has been guaranteed to all persons including the sex workers. But very often in case of sex workers this right has

⁵²Universal Declaration of Human Rights, art. 1 "All human beings are born free and equal in dignity and rights ..."

⁵³United Nations Charter, art 1, para 3, "To achieve international co-operation in solving international problems of an economic, social, cultural, or humanitarian character, and in promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction as to race, sex, language, or religion.",

⁵⁴Supra note 52, art. 2 "Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.",

⁵⁵Supra note 48, art. 2 para 1. "Each State Party to the present Covenant undertakes to respect and to ensure to all individuals within its territory and subject to its jurisdiction the rights recognized in the present Covenant, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status ."

⁵⁶Convention on the Elimination of All Forms of Discrimination against Women, art. 1, "For the purposes of the present Convention, the term "discrimination against women" shall mean any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field". [hereinafter CEDAW]

⁵⁷Id., art. 2, "States Parties condemn discrimination against women in all its forms, agree to pursue by all appropriate means and without delay a policy of eliminating discrimination against women and, to this end, undertake...",

⁵⁸Supra note 50, art. 2, "States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind...",



been exceptionally violated just because of their work. This right has been fundamentally safeguarded under Article 13⁵⁹ of the UDHR and Article 12⁶⁰ of the ICCPR, which guarantees everyone including the sex workers, the freedom to choose his residence.

Right Against Torture and Cruel, Inhuman and Degrading Treatment

States have an obligation under human rights law to protect their people from torture and other cruel, inhuman or degrading treatment. This includes the obligation to prohibit torture and other forms of ill-treatment and to provide redress for such acts. The failure to investigate and bring to justice perpetrators of torture is itself a breach of international human rights law. Furthermore, the use of forced anal examinations contravenes the prohibition against torture and other cruel, inhuman or degrading treatment. These rights are guaranteed by article 5⁶¹ of the Universal Declaration of Human Rights, article 7⁶² of the International Covenant on Civil and Political Rights and article 2⁶³ of the Convention against Torture.

Right to Health

In this pandemic health is biggest concern for sex workers. They are one of the most vulnerable class who are not getting adequate health services. It is relative Governments obligation to provide health services to them. The right to health includes not only ensuring accessible, acceptable, available and quality health services and information, but also that the necessary public health infrastructure exists and is adequately resourced to meet the health needs of the community, including in the prevention, treatment and control of pandemic. This right is guaranteed by article 25⁶⁴ of the Universal Declaration of Human Rights, article 12⁶⁵ of the International Covenant on Economic, Social and Cultural Rights

⁵⁹Supra note 52, art. 13 "Everyone has the right to freedom of movement and residence within the borders of each state."

⁶⁰Supra note 48, art. 12, "Everyone lawfully within the territory of a State shall, within that territory, have the right to liberty of movement and freedom to choose his residence."

⁶¹Supra note 48, art. 5 "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment."

⁶²Id., art. 7, "No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. In particular, no one shall be subjected without his free consent to medical or scientific experimentation."

⁶³Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, art. 2, "Each State Party shall take effective legislative, administrative, judicial or other measures to prevent acts of torture in any territory under its jurisdiction."

⁶⁴Supra note 52, art. 25, "Everyone has the right to a standard of living adequate for the health ..."

⁶⁵Supra note 48, art. 12, "The States Parties to the present Covenant recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health."

CONCLUSION

Sex workers are belonging to vulnerable class of society. Their work is already stigmatized and they are facing lots of inhuman problem already, now the attack of covid-19 makes it more venerable. The covid-19 pandemic has affected them very badly. Due to this pandemic they lost their only job, now they are facing problem of livelihood, shelter, food and health etc. Even they are not getting adequate support from the government. Indian laws and policy are not much supportive to sex workers. Anti-sex workers laws in India are designed not to stop sex work but to regulate and control sex workers and their bodies. Many provisions of ITPA act is uses by police and other authority to harass them. It is the right time to protect their basic human rights and provide them adequate relief without any discrimination.

Governments have to ensure the legal protection of the rights of sex workers and to remove the legal barriers that block their access to governmental scheme. To meet this challenges, international and national law reform is needed. This is war like situation and by mutual help and assistance human race can win this war too. Helping hands can reduce the problem of sex workers in this pandemic whether it from government or from individuals.

SUGGESTIONS

- sex work should be recognised as an occupation. It will be more helpful to protect the rights of sex workers.
- Government should ensure that commercial sex can take place under healthy environment.
- Sex workers should have access to all the governmental beneficial scheme like health, life insurance etc. and their basic human rights of life, liberty, and security, including their right to health care and freedom from violence and atrocities should be recognised by government.
- Sex workers privacy should be maintained at all times. Governments should provide guidance to the media, law enforcement and others that people's identities.
- Government should insure that COVID-19 diagnostics and care must be accessible, available, affordable to the sex workers and their children.