

Appendix C

Summary of Engagement on Regulating Massage Parlours

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Process

Resident Engagement: Residents were asked to register on the Regina.ca website if they were interested in participating in engagement on the issue of massage parlours. Two hundred and seventy-four people registered. All registrants have been included in the Interested Parties List on this issue.

- **Discussion Workshops:** Email invitations were sent out to all registrants inviting them to sign up for one of three sessions. Fifty people attended these meetings. Participants were divided into small groups, each with a facilitator. Participants were provided background and then were asked to explore the benefits and risks of two options (enforce current Zoning Bylaw; Establish a licensing program and expand zoning). They were also asked to provide alternate options for the City to consider.

A summary of the input from the meetings is provided later in this report (see **Resident Discussion Workshops**). A local group opposing human trafficking, Freedom Catalyst, had strong participation at each meeting. As a consequence, there was a strong majority of participants who advocated for a ban of all massage parlours in the city.

- **Written Responses:** Residents were also provided contact information to submit written responses. In total, 46 written responses were received. A summary of the input from those responses is provided later in this report (see **Resident Written Responses**), but similar to the Discussion Workshops, a strong majority of respondents were in favour of a ban.
- **Private Interviews:** Four residents asked for and received the opportunity to have a private interview with the project lead. All of these residents had participated in the Discussion Workshops and simply wanted another opportunity to restate their perspective (which was to ban massage parlours).

Massage Parlour Sector Engagement: Initially, the plan was for the Regina Police Service (RPS) Vice Squad to conduct interviews with people working in the sector. To prepare for this, the City developed an interview guide and prepared background material on the issue so Vice Squad interviewers would be ready to answer any questions. We also kept RPS in the loop on plans for such things as resident meetings (including one that had initially been scheduled at the Glen Cairn Community Centre until we realized the numbers of residents who were interested, after which we moved the meeting to another location and scheduled it over three nights).

The procedure that we worked on with Vice was not successful. People were either unwilling or unable to speak to them (we later learned most required Mandarin interpretation). Vice left copies of all of the materials we provided them in the massage parlours, including information about a meeting at Glen Cairn Community Centre.

We discovered later on that a number of owner operators showed up for the meeting at Glen Cairn. We were not there because we had not known that this information had been provided to them. Working with one of their representatives, we sent a letter of apology in English and Mandarin and invited people to another meeting. In addition, several operators reached out to me and asked for a private interview.

Finally, we worked with a community organization, the Regina Sexual Assault Centre, to act as our proxy to engage with front line workers. They interviewed three workers.

- **Sector Meeting:** Six individuals attended the sector meeting. Three were female owner/operators who required Mandarin interpretation (which was provided). Two were female English speaking owner/operators and one was a male English speaking associate of many of the Chinese owner operators (whose role in the businesses is unclear). One of the English speaking participants also provided a written brief.

A summary of the results of this meeting as well as the written brief is provided later in this report (see **Owner/Operator Sessions** and **Owner/Operator Written** Input).

- **Private Meetings:** Four individual owner/operators asked for and received private meetings with the project lead. Two of these meetings required Mandarin interpretation. The picture presented by each of these meetings was consistent with the picture presented at the sector meeting.

A summary of the results of these meetings is provided later in this report (see **Owner/Operator Sessions**).

- **Proxy Interviews:** The Regina Sexual Assault Centre was able to interview three front line workers in massage parlours. The results of those interviews is provided later in this report (see **Proxy Interviews with Front Line Workers**).

Other Engagement Activities: In addition to meetings with residents and the sector, the project team also met with two academics who are specialists in sex work and its regulation in Canada, the City of Edmonton, and the RPS Vice Squad. In addition, the team has reviewed a number of peer reviewed articles and studies on sex work, particularly in massage parlours as well as some leading publications on human trafficking.

Executive Summary of all Consultations

- 1) The residents that were engaged in the process strongly want these businesses to be banned however this will negatively impact worker safety which was one of the intentions behind the work.
- 2) Residents have said that their primary reasons to ban is to: increase worker safety and increase neighborhood safety and land value. However, a ban will do the opposite of that and workers will be forced underground and more vulnerable to predators
- 3) Although the majority of engaged residents, want them banned, a minority of them were supportive of other options or a combination of other options. Many recognized the complexity of the work.
- 4) Zoning them in industrial is also unsafe while the safer MAC zoning is also unpalatable to the people who were part of the process
- 5) There is a general sense from the public that these businesses are unsafe for the workers and that the majority are trafficked women. They feel like banning them would make them safer. Talking to the workers/owners, they feel like this is a misconception. They are usually the only worker in the business. They are there by choice, they are small business owners and they are safer in their businesses than in the street.
- 6) Owners would prefer just their business be required to get a license and not the workers themselves. They have privacy concerns for workers requiring to get licenses and background checks. They support any requirements for a business license including background checks for owners, separation distances and training.
- 7) Owners do not want to move to industrial, they want to stay in MAC areas
- 8) Academics caution against a licensing scheme because it makes this business “exceptional” from other businesses which further stigmatizes the workers. If workers are not bringing forward the concerns, then why is the City trying to put more regulations in place?
- 9) Other supports like a liaison role between police, city and workers could be beneficial
- 10) Make licence costs reasonable, but maximize the cost of penalties for non-compliance

Resident Discussion Workshops

Theme 1: Participants in the sessions prefer to ban massage parlours

Key Concern: They want them out of residential neighborhoods

- Concerns that they are too close to schools and churches and will entice you men to go there
- Out of residential neighborhoods will also increase land value and safety of neighborhood
- Less stigma for heritage neighborhood
- Looks better for tourists
- Feel it fuels crime
- Some were okay with going to industrial only because it is not in residential or commercial
- They don't want current businesses grandfathered in
- Invites an element of undesired tourism
- Removes organized crime from residential
- Less everyday exposure and accidental exposure to body rub

Key Concern: It is an unsafe industry for women/women are exploited

- Medically unsafe for women
- No way to prove girls are getting the money they deserve- exploited
- Research done on the damage prostitution does
- One argument is that if we ban it here, women can go to other cities or leave the sector
- Curbing exploitation of women
- Other Cities tried licensing and it did not work. Some have banned them
- Licensing them overstates the safety it provides
- The risk is with the Johns
- Only safe on the outside, not safe on the inside
- Not accessible (more access leads to more addiction)

Key Concern: By licensing or zoning, it makes the City complicit and supportive of these businesses

- Normalizes the sex trade and these businesses and makes it seem legitimate
- By banning, makes it clear that it is not acceptable and upholds current legal structure
- Intent of Canadian law should be reflected in City's approach
- Set an example for the rest of the country
- Illegal to live off of profit of sexual services
- Still illegal to buy, our job is to not promote prostitution
- Creates misconceptions of other women around the establishments
- City would earn off the illegal activity
- "broken window" theory
- By banning, Less taxes through trauma counselling and addictions
- Doesn't put the city in the position as a pimp

Key Concern: Allowing them requires more police presence which costs taxpayers

- Would need more police to enforce
- Need more police and bylaw officers
- Mandate that at least one employee is trained on the bylaw requirements including what types of services that are allowed to be performed on premises and also that another individual is present during all appointments
- Increase resources to Vice
- Report a John
- Increase public awareness to johns and potential johns
- will negatively impact City's ability to attract big events

Theme 2: Participants don't want them in industrial areas or MAC either

- Less safe for workers
 - o No eyes on the streets
 - o Surrounded by open land, no lights
 - o Nowhere to go for help
- Businesses won't want them around – damages businesses
- MAC would not make it safer
- Property value in industrial goes down
- Less police in industrial
- Gives impression it's a legal business
- Counteracts the downtown business improvement district
- Only benefit to industrial is the owner of business- free to do whatever they want
- Driving by isn't more safe- doesn't help on the inside safety
- Transportation safety in industrial areas
- Congregates other forms of illicit activity
- Might push business out of city
- Option 1: Not consistent with OCP- not industrial use
- Conflicts with plan to increase number of people living downtown
- Never would be comfortable with model in relation to MAC zones
- Ugly
- This will bring down the MAC- not right kind of traffic you want there

Only a few people were fine with option 1 as it is:

- Less demand "out of sight, out of mind"
- Know it's unsafe but don't care
- Not impacting downtown businesses and kids/families
- Reduce likelihood of attracting workers and clients from neighborhoods

Theme 3: Participants think sex workers should have more resources to support them

- Help line, ombudsmen
- Women need an anonymous way to report concerns
- Need a way to educate men as well

- If it is banned, then there should be education or retraining for people to exit the industry
- Safe house
- Shelter for exploited people
- Any funds used to decrease victimization
- Increase housing and support services
- Need safe spaces for workers

Theme 4: A minority of participants were comfortable with the licensing option, zoning option or a combination of the two proposed options

- Some like the criteria for licensing because it makes it safer for women
- Some wanted the distance requirements for businesses to be higher than 75m
- A benefit was that licensing helps cover part of the fees for increased enforcement however it may be a burden for women
- One benefit is the requirement to submit income tax
- Legally able to work helps to ensure they aren't being exploited
- Hours of operation could distinguish between body rub and RMT
- Like the education piece
- Need to limit radius between businesses
- Like that they can inspect them
- Training should be by a neutral party
- Health checks should be required
- More visibility means more accountability
- Empowers women
- Protects workers (age, names, dictate where they exist)
- Would help with missing people
- Safety/health standards
- Any funds used to decrease victimization
- Liked requirement- camera
- Licensing only as a tool to shutdown
- Putting in industrial- limits people going to the location
 - o Rent/lease for building is more expensive
 - o Bigger investments
- Support MAC
 - o See them in a busy area
 - o Protection for clients and workers
- Clients know that it is safer and that they aren't supporting trafficking
- Always a risk to workers- trafficking is still an issue even if off street/clients come to them
- Can clients get their pictures taken?
- Are the clients tracked? What happens if STDs are spread?
- Similar to marijuana
 - o People said there would be horrible consequences to legalizing which hasn't happened
 - o We need to be open to change- we are working against ourselves because it will happen anyways

- Certain amount of dedicated parking per parlour
- Licensing must finger print workers
- Signage required
- Increase corridors from body rub parlour and residential areas (homes, not just schools or daycares) to be 150m
- Only street side entrance

- *Option: licensing and in industrial- still a risk to the women*
 - o Recognizes that this is oldest profession. Can help to prevent it from going underground
 - o Keeps it out of high traffic areas
 - o City is a pimp
 - o Strictly regulated (option 2) all items

- *Option: industrial with business pays for licensing but not workers*

- *Option 1 with MAC:*
 - o Out of sight out of mind- decreases demand “johns”
 - o Opportunity to shut down?
 - o Likely fewer establishments
 - o Doesn’t stop moving the girls around
 - o What is bus schedule for work- safe travel?
 - o Johns are “hidden”- anonymous

Even those in support of licensing, had some concerns:

- Onerous requirements for licensing could lead to more underground work
- Can create an onerous process for licensing
- Offering in other languages
- How often would checks be done?
- Who pays?
- Can we measure benefit of licensing?
- Still discretionary use- residents and council will say “no” anyways so they are still illegal
- Being a discretionary use is a disincentive
- Requirements may be too high and encourage unconformity

Theme 5: A minority of participants recognized the risk in banning them entirely

- Users might pray on others if they don’t have that access
- Undocumented women are out of jobs and housing- like refugees in a way
- They could go underground – worse for workers
- No signage- harder to find them to help them, don’t know where they are
- Illegal activity may still occur, less ability to enforce
- What does the next form of exploitation take place?
- Worse for women trapped (not observable/.safety bell or monitoring)

Theme 6: A need to define formal massage therapy and require these businesses to show their RMT license

- This will clarify services of establishment
- No confusion for customer or bylaw inspector
- Risk: may only need one RMT to obtain approval - Develop criteria such as 80% services provided by RMT or threshold body rub vs massage
- Credential don't guarantee no sexual services
- Every legitimate massage therapist should be required to have a license or not allowed to work
- Massage therapy needs oversight with the ban
- strict regulations for legitimate massage businesses, any business that involves touching customers

Resident Written Responses

Theme 1: Most submissions requested a ban on body rub parlours

Key concern: they contribute to the trafficking and sexual exploitation of girls and women.

- They cost residents additional tax dollars to provide additional policing, trauma care, addictions treatment, counselling for post-traumatic stress and city enforcement;
- They create major safety concerns and problems for workers and clients
- They exploit vulnerable girls, youth and women
- They increase STDs in the community;
- While banning it wouldn't completely eliminate the sex trade, it would at least result in less exploitation
- They normalize prostitution and contribute to sex addictions
- Prostitution is a form of slavery and never voluntary
- They result in violations, abuses, neglect, trauma and damages encountered by children and youth at the hands of those who delight themselves in exploiting these girls/women victims.
- At least 96 per cent of workers are not working voluntarily in the sex trade.
- Workers are predominantly poor, visible minority women with low education coming from marginalized backgrounds.
- Workers face loss of freedoms, choices and autonomy, violations of their personal rights, harassment/assault, STDs and unwanted pregnancies, and higher mortality rates.

Key concern: they're immoral and illegal

- they undermine the stability of the family unit
- they degrade the city and its citizens
- They foster increased crime and the presence of organized crime, and send the message that buying sex is legal;
- They encourage the wrong type of tourism
- Body rub parlours are run by organized crime.
- They don't promote the right image, they lower property values, and don't promote strong families

Key concern: they devalue property and neighbourhoods

- They reduce the desirability and real estate value of the surrounding businesses and homes

Owner/Operator Sessions

Theme 1: They want to stay where they are (MAC and Industrial)

- Not safe to be in industrial – not safe to go home
- Most other massage parlors, running on main streets on other big cities
- There will be lots of issues with moving
- Transportation would be worse
- There will need to be a transition plan or grandfathered
- A big issue- there is a massage parlour right next door so not sure what the criteria would be for who to move
- Customers won't be able to find them in Industrial
- Hard to get workers
- Isolated
- Worker safety is a concern
 - o Transportation
 - o Lack of traffic/foot traffic
 - o Distance from police station
 - o Some of the girls don't speak English
- Is enabling a Red-light district
- People don't want to move
 - o Won't find workers there
 - o Die out the business
 - o Workers would move to other locations or cities

Theme 2: They prefer licensing the business over licensing the workers

- If women are only here for 1 month, it's not worth getting a license
- She only wants 19 and up workers
- Generally, they are the only worker or they bring in someone to help with covering vacations
- In the past, have had troubles getting workers with licenses in other cities.
- Privacy- workers don't want others to know they are coming here to do this work
- Temporary license?
- Worker license privacy
 - o Doesn't want to be released to the media
 - o Owners of the spas- it would be the spa business that would be licensed, name wouldn't be public for the spa owner
- They will comply with regulations- don't want to start trouble
- Background checks on owners okay
- They are okay if police were inspectors
- Language barrier with police
- Workers might be checked at airport security- find out their profession
- Hard to do business because so much competition

- Accept requirement for a reasonable distance between establishments
- Lack of agreement on overall separation distances from other establishments – schools, etc.
- As long as city doesn't move them, they will comply with the signage and other regulations
- Good to limit number of licenses – some different opinions on that
- Okay with regulations including training
- issues regarding limiting hours of operation. Ladies prefer to choose when they work; clients want privacy as well
- Divergent of views on whether to the limit the number of parlours
- Would post emergency/safety contact sheets
- Zoning bylaw currently limits to no more than 5 customers at a time- satisfactory
- Any licensing needs to be supported by enforcement; welcome enforcement
- Customers pay with credit cards- Canadians want that
- Prefer 24 hours
- Okay with separation distances
- Okay with criminal record check
- They want to follow government rules- do they have support for workers? Will need mandarin translations

Theme 3: They want to be able to live and work in the same location

- More economical
- They have a full living quarters in the house
- If required to live elsewhere, they would need to find another place to live and get transportation (1500-2000 per month)
- In houses, designed for that
- Impression that women are trapped in there- there is a freedom and safety aspect, they don't have to leave with cash. It's a convenience.
- Even if they stay there overnight, they don't work after 11pm /midnight
- Perception that there are lots of girls in each one- not the case

Theme 4: There is an unfairness to licensing one type of sex worker and not another

- General unfairness - in Saskatoon, all adult workers need to be licensed and here not. There is an unfairness between spa operators and other people- escorts. Unlevel playing field. It encourage them to go underground
- Crack down on bad apples, not all of them
- City could create unsafe work- highlighting it is a cash business (burglary)
- level playing field for licensing with other types of adult entertainment businesses
- Escorts including in working in body rub business for safety. All adult entertainment
- Human trafficking?
- Body rub parlours are the safest option - licensing and regulations would make establishments safer for workers

Theme 5: If they are banned, workers are less safe

- More crime, more street crime

- There are no incidences of violence in massage parlours
- Women are not being forced to do this, they make good money
- There is demand for the service
- Customers now are long term, older, don't cause trouble
- When it goes underground to apartments or condos- the number of robberies is 10x higher. People are blackmailed, women have no option.
- Organized crime will take over
- Public is misinformed about parlours
 - o Parlours are not currently involved in organized crime
- Mistreatment increases
- Quality decreases
- They are taxpayers

Owner/Operator Written Input

- Carefully chose his/her current location in an industrial zone so as not to infringe on current city bylaw.
- Current location is very discreet, without any large displays or advertising to draw attention.
- Agrees that the number of parlours is a problem.
- His/her business is professional, clean, drug and alcohol free and safe. All staff are of a legal age and at least age 21 and legally permitted to work in Canada.
- Safety is a priority, and staff are not forced to provide any services that are unsafe or that they don't want to do. Windows and outer security doors have bars to ensure safety.
- Has no problem with licensing, but does not think workers should be licensed for privacy reasons. The concern is that information could be shared with other government agencies, such as Social Services, which may threaten a mother's custody/access to her children. Or that the information may be subpoenaed into court to be used against them in legal proceedings. The workers don't want a paper trail to come back to haunt them – they move on to become nurses, social workers, etc. They want to feel assured that this won't prevent them from getting decent jobs.
- Hours of operation should not be limited, as many services take place late at night when there's more privacy and discretion.
- Agrees with the name change.
- The underground industry has exploded in terms of individuals advertising online and providing sexual services in hotels, airbnbs, and in their own homes
- The industry is here to stay and trying to drive it underground does not protect or assist vulnerable women.
- So yes change the name.
- Yes, have them placed in industrial zones.
- Yes have the businesses licensed as adult entertainment.
- Yes, have policy enforcement.
- Do not have the worker require a license.

Proxy Interviews with Front Line Workers

The following ideas were posed to three current and former sex workers, both involved in street work and involved in body rub parlours. Their identities will be kept confidential on their request, but they were all thankful for the opportunity to share their opinion and that the city was addressing the issue to help keep them safer while at work.

Location within the City

In regard to where the “location” of the body rub parlours should be located within the city, all three women agree that the Industrial area would be an ideal host. It is made the prime location due to its distance from the general public, schools or parks in which children can be found, and is still a business-like area of the city. One woman stated this area would make the men feel more comfortable as it would be discrete in comparison to if the location were downtown and they would need to pass by a busy street in order to enter the building.

They did raise concerns however about the location being further away from their current locations which would make it difficult for them to get to work as most live in the Central area of the city. One woman offered an idea of providing a shuttle that would pick up the women from home and taking them to work and drive them home afterwards. This shuttle would maximize the safety of the women and help them feel supported and protected.

Two women also recommended the bar district as it would be closer for the women to their homes, to where they are currently working, and it would not be out of the way for the men. One woman did disagree, thinking the Industrial area would be the best option because that would be all the men would go to that area for. While if the location was in the bar district there would be a greater risk that then men may come in intoxicated and the women’s safety may be put at risk.

Two women thought that the location should include some type of lighting, making it similar to a red-light district. One woman disagreed, stating that discretion would be better than advertisement for both the men and the women, providing privacy to everyone.

Licensing

All three women agreed that licensing both the facility and the women should be a necessity. Two of the women shared some terrifying stories about human trafficking that occurs all the time. They feel that licensing the women and the facility is a way to attempt to combat this, ensuring everyone who is working wants to be working.

One of the women who shared her voice has lived all over Western Canada and discussed her experiences in different cities. She wanted to make particular mention of what is being done in Calgary; they provide the women with “licenses” which have a picture of the woman and her information to ensure the women working is exactly the women who it is supposed to be. The city of Calgary then would charge each woman a \$200 monthly fee to maintain the “license.”

Proof of age/identity/ability to work in Canada

All three women agreed that women should have to provide proof of age in order to work. They think this should be done to ensure that all women working would be over the required age. All of the women feel passionately that only women of age should be allowed to work and would be willing to provide ID to make sure that happens.

One of the women encouraged using real pictures of the women, telling a story of a time in which her friend posted pictures of a woman who was not herself and when the man arrived, he was disappointed and left. Providing real pictures would ensure the men knew exactly what they were agreeing to and it would protect the women's sense of self-esteem.

All three of the women agreed that proof of identity should be required to work. They could not stress enough how horrible the human trafficking scene is and feel that needing to provide proof of who you are and your willingness of being in that situation would be a way to combat this in a major way.

All three also agree that the women need to be eligible to work in Canada, preventing human trafficking should be a main priority of these establishments in the opinion of the women.

Meeting Health and Safety Requirements

All three women agreed that there should be regular STI testing for the women as well as the men. The women I spoke with are HIV positive but have all obtained a status of U=U and think some additional information and education regarding that should be readily available to the women and men. The women all understand the importance regular testing and think that it should be available at any time.

The women when asked also stated that if they had regular, free access to protection methods they would use them. These items include things such as lubricant, condoms, dental dams, etc.

All the women offered the suggestion of having security on the premises to increase overall safety for women as well as the men. One even suggested having panic buttons in each room for a woman to be able to signal for help if she were to need it at any moment.

Mandatory Training on Options to Leave the Sector

All three women agree this is important information to provide, knowing they would be supported should they ever choose to leave the profession. It is always important for a person to know they have options.

The women also suggested education be provided for the men prior to their encounters with the women. By education they mean ensuring the men know what is and what is not allowed, ensuring they are treating the women with respect and value. This will not allow for any miscommunication about what is allowed and what will be tolerated. If the men and women know the rule, they will be more likely to follow them or ask for help when they are not being followed.

One of the women also suggested ensuring everyone involved understands confidentiality, recalling a time in which she was at the grocery store with the children and had a client approaching her asking to set up another date. Confidentiality would also protect the men because the women would be unable to blackmail them for accessing the services, as apparently happens quite frequently.

Consultation with Regina Police Service Vice Squad

Sector Structure

- Some operations are relatively stable; but some of them -- it's always a different girl there, so you don't know who the owner truly is.

- There's only a few that are owner/operated from here- some we don't know owners. The owners are the ones that ultimately benefit- they are in other cities
- Women who help don't know who the owners are- they don't convey who they are helping either, evasive
- A lot of older ones in the parlours-it's a "family business"
 - o Vast majority of workers are likely coerced into the trade
 - o They feel like they are coming over to send back money
 - o Tricked into doing it- they don't realize what they need to do and then stuck in it
 - o Ashamed- cultural difference- stuck in it

Regulation

- Recognized the following:
 - o If regulation is too much work, they will shut down. They won't set up in Regina – the work will move to some other location.
 - o No matter what is done on the regulatory front, the sale of sexual services is always going to happen – the alternatives may be more risky for the workers.
- Generally agreed with the licensing recommendations, including:
 - o Criminal record checks
 - o Ownership of property and business (an actual name and not just a numbered company)
 - o Low cost for licence; High cost for non-compliance penalties

Consultation with Academics

- So pleased that the City is doing this type of analysis for framework
 - o Normally it is who is loudest, who wins- might end up being that
- The people who are in the sector face daily stigma
 - o Very unlikely they will come to city council to say their opinions
 - o Some people can come forward and some people can't
- Critique on human trafficking is getting louder
 - o Bedford charter challenge is helping it pick up in media and policy
 - o Well-meaning individuals want to stop trafficking but the evidence and policies based on anti-trafficking do a disservice to workers
 - o Increase discrimination and move it more underground
 - o Anti-trafficking picked up by anti sex work and anti immigration- racist and sexist notions, built on moralistic and religious assumptions
- Bring in women's experience that are working in the sector
 - o Community based research- sex work with non status migrants, refugees, trans people, indigenous, indoor and outdoor
 - o That policy creates a lot of problems
- Recommendations:
 - o Need to steer away from a ban approach - talked at the supreme court level (Bedford decision) - there are some nuisances to communities, but it doesn't outweigh the harm to sex workers
 - o Avoid restrictions to areas where there is less transportation and less light

- The presence of massage parlours typically doesn't harm neighbourhoods. Issues are generally limited to noise, loitering, trespassing. These are nuisances and they can be managed
- Focus on enhancing safety and protecting labour rights
- Try to avoid treating sex workers as exceptional. It only adds to the stigma of their work. For example how does the City treat workers who do other forms of "body work" (e.g. models, massage therapists, tattoo, etc.). Are they required to participate in similar licensing schemes?
- Right of access to inspect without notification can be very negative. Experiences unknown inspections were very onerous and way more than any other business. If it's too threatening, workers will not go through the licensing system. A license process can create an illicit sector- criminalizing people who choose not to take part in the licensing.
- Banning is already the law- useless
- Could possibly have a status quo option- not enforcing anything right now
- There are some benefits with doing outreach
 - City liaison position - health standards, work with agencies
 - Inspector can also be a female and act as a liaison between worker and police
- Take some care about who is chosen for regulation – don't pick groups that are already marginalized. This almost never benefits those people.

Consultation with City of Edmonton

- Originally had established a very strong licensing scheme with strict enforcement:
 - Establishment licences \$6,000
 - Worker licences: \$500
- Result was many leaving the body rub sector to either more risky work (escorts; street work) or to establish a fully licensed massage therapy operation – but still did sex work. While sex work contravened the licence of a massage therapist, Edmonton was not allowed to report to the licensing body when they discovered sex work was occurring.
- Revised bylaw to establish a whole different system focused on harm reduction
 - Licences for business: \$630
 - Worker licences: no cost, but must receive a 4 hour training. Content:
 - Specifics of the bylaw
 - Where and how to access support resources (health; safety; drugs; exiting the sector)
 - Presentation on sexual exploitation (including identifying flags for human trafficking)
 - Health; including
 - STI protection
 - Administering Naloxone for overdoses
 - Team of two bylaw inspectors and a Community Safety Officer. Between these three individuals, they visit each of the 33 licensed operations at least once a week. Purpose is outreach and relationship building. Police will sometimes attend, but their role in these circumstances is also outreach. Enforcement is separate.
 - Almost none of the cost of the system is recovered through licence fees.