

Jamie Spiteri

From: [REDACTED]
Sent: Thursday, 21 October 2021 10:32 AM
To: Moira Deeming
Subject: kathy letter

Dear [REDACTED]

Re: Sex Work Decriminalisation Bill 2021

Further to previous correspondence on the above Bill, I appreciate your request for Council to make further comment on its many concerns.

The lack of in-depth consultation with the Local Government industry and the communities we represent, along with extremely restrictive timelines, we were unable to conduct a proper consultation with our residents about the proposal.

Council submits that sex work is simply not compatible with commercial or residential areas, and should operate only within the industrial zones. The Government's current proposal to deregulate sex work is completely inappropriate, and will significantly undermine the safety, amenity and financial stability of our community. All people, and especially children, have the right to live and work in an environment free from unwanted sexualisation and sexual solicitation and that residents and business owners in urban environments have the right and the responsibility to live and work in community and family-oriented environments.

Council further submits that deregulating and extending sex work into residential and commercial areas will not actually deliver on the objective of enhanced safety for sex workers. If this model is adopted sex-workers will tragically continue to be harmed, and likely at greater rates and with greater impunity due to the removal of every safeguard currently in place.

Council suggests instead that the government increase regulatory power, funding, and resources to the police and health services units dedicated to serving the sex work industry. By way of example, the Government could strengthen rather than abandon the Victorian Sex Act (1994) by:

- Introducing strict testing regulations to make sure that every 'customer' is free of STIs prior to 'hiring' a prostitute.
- Introducing strict regulations to make sure that the prostitute is free of STIs (sexually-transmitted infections) and that testing must be conducted in between each and every 'customer'.
- Introducing occupational health & safety regulations for the sex work industry in line with other professions, (e.g. surgeons and nurses), in which the worker is at high risk of coming into contact with human biological fluids.
- Introduce strict record keeping protocols for the sake of public health, for the purposes of efficient 'contact tracing' for sexually transmitted infections.

Council is particularly concerned about the proposed deregulation of sex work for the following reasons:

- The government's claim that 'social attitudes' cause most of the harm that prostitutes experience has is highly contested. Decades of research has consistently shown that "prostitution itself is a traumatic stressor," because prostitutes, be they free or trafficked, adults or children, suffer PTSD at more than twice the rates of active combat veterans, whether they live in a culture that embraces sex as 'work' or not.
- The removal of police oversight, and replacement with 'Council Officer' oversight in an industry world renowned for its close ties to human trafficking, child trafficking, drug trafficking, gangs and general violence is particularly egregious. Our Council officers do not have any of the required weapons, combat training, psychological training, or legislated enforcement powers that would be required to ensure any level of safety in this industry at all. This amounts to cost shifting from the State to Local Government, that will inevitably put our officers, our residents and our prostitutes themselves at greater risk of harm.
- 'Buffer distances' and 'time zones' for sex work activity in residential and commercial zones are unrealistic, impractical and most importantly, do not alleviate the negative impacts of public prostitution on the safety, amenity, liveability and commercial viability of Melton. Children have the right to a public environment free from age inappropriate sexualisation, such as public prostitution. All areas of our community are frequented by children every day of the week, from very early in the morning until at least 9pm at night, due to before and after school activities, weekend sporting, social and religious activities. Thus, it is inappropriate to allow prostitution outside of industrial zones.
- Council submits that sex work is simply not compatible with commercial areas and should not be categorised as a general commercial business. Public street-based sex solicitation and shop front brothels are selling highly dangerous products, which carry extremely high risks of sexually transmitted diseases. Therefore, they belong in the Industrial Zone. Further, businesses in our municipality have already raised concerns about close proximity 'sex work' resulting in families, children and all those who want to avoid being solicited in public or mistaken as brothel customers- avoiding the surrounding shops entirely. Clearly, this policy will negatively impact the safety, amenity, and economic viability of the area.
- Council submits that sex work is simply not compatible with residential areas and should not, under any circumstances, be categorised as a home business. The negative impacts on homeowners' investments, on the safety and comfort of women and children, are simply unacceptable. Further, Council also has a real concern that were sex workers to operate from a

dwelling, it would be almost impossible to ensure victims of trafficking, or minors or children, were not also on the premises. That is an entirely unacceptable risk.

Council looks forward to your response to this important issue for the community.

[REDACTED]