Doing Business in Winnipeg By-law Review

Stakeholder Engagement Summary

November 2021

Background

On September 26, 2019, Council passed a motion directing the Public Service to report back to Council whether additional regulations on certain forms of businesses will enhance the City of Winnipeg's (City) ability to address and maintain community standards resulting from specific business activities, including body rub parlours and escort agencies.

Recommendations were presented to Council in June 2021 to improve the health, safety, well-being, and protection of body rub practitioners and escorts in these establishments.

Council laid over the recommendations and directed the Public Service to report back within 180 days detailing how making business licenses available to adult orientated businesses reconciles and/or complies with the Protection of Communities and Exploited Persons Act, and incorporate further engagement.

The bylaw review included a cross-jurisdictional scan of other municipalities to determine best practices and stakeholder engagement to gather input from those with knowledge of body rub parlours and escort agencies.



Engagement

The City reached out to stakeholders to gather input on bylaw recommendations. Stakeholders included body rub practitioners, escorts, resource/support providers, Indigenous organizations, government representatives, and professional associations. A full list of stakeholder groups can be found in Appendix A.

The objectives of the stakeholder engagement were to:

- Determine support and opposition to licensing body rub parlours and escort agencies
- Understand the safety implications of licensing and not licensing body rub parlours and escort agencies with and without harm reduction measures
- Identify potential measures to improve the safety of body rub parlours and escort agencies

Four stakeholder sessions were hosted to gather input on licensing adult-oriented businesses and improving safety. The small group sizes allowed for a more open and comfortable conversations. The stakeholder sessions began with a brief introductory presentation followed by a facilitated group discussion around three topics. Participants were also encouraged to share additional topics during the discussion.

The City also invited body rub practitioners and escorts to share their input through an anonymous form in recognition of the sensitivities around the project. The anonymous form allowed those on the front-line who were not comfortable with attending an in-person stakeholder session to participate.

A summary of stakeholder engagement opportunities is available in Table 1 below.

Table 1: Stakeholder Engagement Opportunities

Date	Activity	Participation
September 8 - October 10, 2021	Anonymous Form for Body Rub Practitioners and Escorts	19 submissions
September 27, 2021	Session #1 – Resource/Support Providers	5 attendees
September 28, 2021	Session #2 – Indigenous Organizations	3 attendees
September 28, 2021	Session #3 – Government and Professional Associations	5 attendees
September 29, 2021	Session #4 – Body Rub Practitioners and Escorts (lived experience)	6 attendees

Winnipeg

Doing Business in Winnipeg By-law Review

Stakeholder Engagement Summary

November 2021

What We Heard – Stakeholder Sessions

Views on Licensing

Stakeholders were asked to discuss the benefits and drawbacks of licensing body rub parlours and escort agencies during the sessions. A summary of key ideas from these discussions are outlined below. A more detailed account of the discussions is available in Appendix B.

Body rub practitioners noted that they feel more safe and comfortable working for a licensed parlour compared to working independently. Independent work was perceived as a much higher risk at the session. Practitioners expressed concerns that parlours would no longer be able to operate if the City stopped licensing. They noted that all practitioners are screened before being hired and there is a culture of trust between their co-workers.

> ***My choice to work at a parlour is a harm reduction measure in itself. I don't want to go independent. This is a safe workplace for us. I trust my coworkers.*** **(Stakeholder, September 29, 2021)**

While support for licensing businesses was strong, practitioners and escorts did not support licensing individuals. They explained that licensing requirements for individuals are a barrier because of the fees and perceived safety concerns with police surveillance.

> ***I don't feel safe getting licensed if I have to provide my information, knowing that it will go to the police.*** **(Stakeholder, September 29, 2021)**

Resources/support providers had mixed opinions on the benefits and drawbacks of licensing. Some providers felt that there are no advantages to licensing and that it normalizes violence against women, girls, and boys. They also explained that licensing makes it easier to take advantage of vulnerable people.

> ***This is legitimizing the violence against vulnerable people. These places are a conduit to violence against women and boys.*** **(Stakeholder, September 27, 2021)**

Other providers argued that demand will continue to exist for adult oriented services even if the City stops licensing. This could result in less protection for body rub practitioners and escorts.

> ***If you stop licencing, it doesn't stop it from happening. If you are able to work with a licenced agency, there is some protection. There are more unsafe places where this happens and if licenced places cease to exist, it will all move to more unsafe places.*** **(Stakeholder, September 27, 2021)**

Participants at the government and professional associations stakeholder session felt that licensing businesses and workers allowed police to establish relationships with the owners and workers. They noted it requires a lot more resources to monitor non-licensed businesses. However, perceptions of police surveillance were noted as a drawback.

> ***I can see some aspects of the bylaw as intimidating. They need a criminal record check, and could feel subjected to police surveillance if they must provide details of where and when they are operating.*** **(Stakeholder, September 28, 2021)**

Government and professional associations also noted that restricting adult oriented business to Downtown was a drawback of the current licences. Some parlours are operating outside of Downtown as health spas because they cannot get the proper licence. This can create confusion among customers and presents a challenge for law enforcement.

At the meeting with Indigenous organizations, concerns were expressed that licensing body rub parlours and escort agencies encourages sexual exploitation and human trafficking. Even the language used in the bylaw can give people the wrong impression and normalize violence.

Winnipeg

> ***When we call it sex work or sex trade, it implies working, trading something of fair value. But with sexual exploitation, there is a power imbalance, and it benefits men. This is not women empowerment. She is not in control of the situation. It clouds the issue and normalizes violence.***
> **(Stakeholder, September 27, 2021)**

Other problematic terms that were noted at the meeting with Indigenous organizations included 'workers,' 'child/juvenile prostitute,' and 'sex industry.' These terms do not accurately represent the experience of survivors and minimizes what is going on.

Views on Improving Safety

Stakeholders were then asked how the City could improve the safety of body rub practitioners and escorts through licensing or how they would be impacted if the City eliminated licensing. A summary of key ideas from these discussions are outlined below. A more detailed account of the discussions is available in Appendix B.

Body rub practitioners indicated that requirements in the bylaw for security cameras and surveillance systems is not needed because they are already in place at parlours. Both body rub practitioners and escorts agreed that making it easier to obtain business licences and allowing businesses to operate outside of the Downtown area would improve safety because protections could be extended to more workers in more areas of the city. Escorts also noted that having to maintain a Downtown office space is a challenge because their work sites vary and is not permitted in their Downtown office under the current by-law.

While licensing businesses was noted to improve safety, body rub practitioners and escorts felt that individual licenses did not offer the same protections and cited concerns with police and police surveillance. They recommended that the City either eliminate individual licences or at a minimum reduce barriers to obtain individual licences. Suggestions included lowering fees for individual licenses and requiring workers to submit less information.

Resources/support providers had mixed opinions on how the City could improve safety for body rub practitioners and escorts. One organization explained that there is no way to make adult oriented businesses safe, even with licensing, because customers always come before practitioners.

> ***There is no way to make it safer. Even in regulated environments, they still operate on 'the customer is always right' not on the safety of the women and girls in these places.***
> **(Stakeholder, September 28, 2021)**

Other providers felt that better monitoring and enforcement of businesses would improve safety. However, more funding would need to be available for proper monitoring.

Resources/support providers found common ground that addressing the root causes that lead to victimization and exploitation would improve safety. Poverty, transphobia, and homophobia were all noted as root causes and could be addressed with tools such as guaranteed minimum incomes, funding initiatives, and engaging with organizations that currently work on addressing the root causes.

> ***We need to address the systematic poverty that creates these systems where people are exploited.***
> **(Stakeholder, September 28, 2021)**

Participants at the government and professional associations session felt that the recommendations presented to Council in June 2021 were a big improvement over the current bylaw, which included requiring security cameras, education, and reducing fees for licenses. They also thought that eliminating the Downtown zone would improve workers' safety by expanding protection throughout the city.

Government and professional associations also expressed concerns not only for the safety of body rub practitioners and escorts, but also registered massage therapists and customers seeking registered massages if the City were to stop licensing. The problem with sexual harassment and assaults was noted as a growing problem. The bylaw and licenses could help distinguish the difference between a massage and a body rub.

At the meeting with Indigenous organizations, participants questioned how the City would be able to improve the safety of Indigenous women and girls working as body rub practitioners and escorts though a bylaw and licensing.

> ***If we can't even make sure our indigenous women and girls are safe taking a cab, how can we be sure the children are being kept safe in these places.***
> **(Stakeholder, September 28, 2021)**



They also noted that Winnipeg has the most Indigenous sexual exploitation on the streets, and that sexual exploitation is getting worse and the age of victims is getting younger.

What We Heard – Anonymous Form

Body rub practitioners and escorts were invited to share input through an anonymous form in recognition that not everyone would be comfortable attending a stakeholder session in person.

Of the 19 forms submitted, two were from body rub practitioners, six were from escorts, five were from those who were both body rub practitioners and escorts, and six were neither. Those who were not body rub practitioners or escorts are not included in the analysis below; however, their results are presented in Appendix D.

Respondents were asked to rate their level of support for licensing four areas. While all areas received mixed support, licensing body rub practitioners received noticeably lower support.

Table 2: Do you support the City licensing the following?

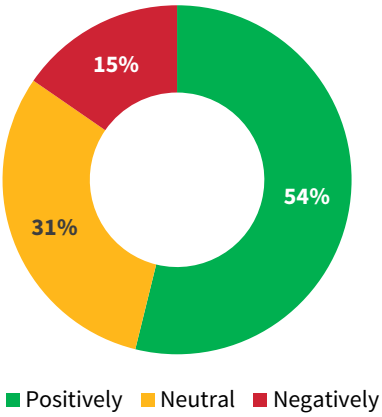
(13 respondents)

Area	Supportive	Unsupportive
Body Rub Practitioners	4	9
Body Rub Businesses	6	7
Escorts	6	7
Escort Agencies/Businesses	6	7

Body rub practitioners and escorts were than asked how eliminating licensing would affect them. The majority of respondents (54%) indicated that it would positively impact them.

Figure 1: If the City of Winnipeg no longer required licensing body rub parlours and escort agencies, how would this affect you?

(13 respondents)



When asked how the City could improve safety if body rub parlours and escort agencies were no longer licensed, the majority of respondents (54%) indicated that decriminalization of sexual services would improve safety. Other ideas included the application of general workplace health and safety rules, labour rules, and reducing the stigma around sexual services.

Body rub practitioners where asked what safety measures could improve their safety at parlours. While there was overall low support for all safety measures, panic alarms did receive the most support.

If the City continued with licensing body rub parlors, what measures should be put in place to improve the safety of workers? (Check all that apply)

(7 respondents)



#1 Panic alarms
(4 responses)



#2 CCTV (working with recording capacity)
(3 responses)



#3 Mandatory information session
(2 responses)



#3 Security guards
(2 responses)



#4 Registration requirements for all staff
(not licensed)
(1 response)

Next Steps

Stakeholder input was analyzed and helped the project team develop recommendations for the Doing Business in Winnipeg By-law 91-2008 update. The recommendations will be presented to Council in winter 2021/22 for consideration. Any updates to the bylaw are subject to Council approval.

Appendices

Appendix A – Stakeholder List
Appendix B – Stakeholder Session Notes
Appendix C – Stakeholder Session Presentation
Appendix D – Anonymous Form Results

Appendix A – List of Stakeholder Organizations

List of Stakeholder Organizations

The City met (virtually) with representatives from the following organizations as part of stakeholder engagement for the Doing Business in Winnipeg By-law Review:

Body Rub Practitioners
Escorts
Joy Smith Foundation
Ma Mawi Wi Chi Itata Centre
Massage Therapy Association of Manitoba Inc
Mount Caramel Clinic
Rainbow Resource Center
Sex Workers of Winnipeg Coalition
Tunngasugit Inc. Inuit Resource Centre
Winnipeg Regional Health Authority
Winnipeg Police Service – Counter Exploitation Unit

Appendix B – Meeting Notes

Doing Business in Winnipeg By-law Review – Resources/Support Providers

Location:	Online - Zoom	**Date:**	September 27, 2021
Attendees:	5	**Time:**	9 a.m. – 10:30 p.m.

Meeting Notes:

1. **Welcome and Introductions**

2. **Presentation**

3. **Q&A**

- Manitoba recognizes non-binary gender, how does the by-law recognize this? It would be important to address this.
    - We need to take a look at the definition in the by law and look at updating that.
- There is nothing specific to Indigenous women and girls in the overview. Why is there not specific information to the vulnerabilities of Indigenous women and girls?
    - The slides today don't go into what we've heard, they include a brief summary of what the current by-law looks like right now. Today we want to hear from you about what it should look like.
- Documentation, research sent of vulnerable people, especially women and girls.
    - Documentation was received.
- Spoke extensively on the issue of vulnerable people, now we are at a point where we are reexamining the information that was given to everyone. City is in conflict with bill c-36, City is open to legal implications. Last person pulled out was 13 years old. This by-law needs review – what's happening in these parlours does not reflect the by-law. We need to make it safe for women and young people. Was hoping this meeting would reflect the information that was already given to us.
    - Appreciate the frustration, we are taking the information we have received to date. This is another opportunity for us to hear your voice. We want to use all the information that was brought forward.
- Some of us who work with victims of human trafficking, we have heard these words. These body-rub parlours need to be shut down and by-laws need to be in place to protect vulnerable persons.
    - It wasn't previously contemplated should we or should we not license these? We were looking at how to enhance the safety. The feedback you've provided has prompted us to review whether or not we should even license them.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

4. **Discussion topic 1 - What are the advantages and disadvantages of licensing body rub parlours and escort agencies?**

- I see no advantages at all; the by-law in place right now is fiction and is not what is happening. It advantages organized crime but that's not what we want to see in our city. No matter how you do it. Other businesses can occur that have nothing to do with taking advantage of the vulnerable – youth, LGBTQ, Indigenous. They should be shut down.
- I agree on some level. There's a challenge – if there was a proper way to enforce the by-law. If you stop licencing, it doesn't stop it from happening. They will just move to houses with no protections. This is a broader issue. If able to work with a licenced agency, there is some protection. There are more unsafe places where this happens and if licenced places cease to exist, it will all move to more unsafe places.
- Worried about the language the City uses to describe the issue. All the language normalizes violence against women and girls. When call them workers, normalizes that these are exploited persons. This is paid rape. The more you water down and normalize the violence, it's concerning. We are working to change the language, as it minimizes the violence that is happening. I worry about the ppt because this is what you're using to talk to people. We need to educate the people at the City of Winnipeg on this language. We need to start changing the narrative by educating on the right form of language.
- What do we do if we don't do anything? The City is not off the hook if this is the approach. We need guaranteed minimum income to solve the root cause of why vulnerable people are targets of sexual exploitation. The victimization isn't something that women can just get over – it's a life-long healing journey. Need to look at this as a bigger issue, so vulnerable people aren't' forced into these situations where they can be taken advantage of.
- We can't be compared to other cities. We have a unique demographic. No other place has had the type of leadership, or has the Indigenous population we have. We need to redirect energy into solving poverty.
- We have to be realistic that the idea of sex/sex-adjacent work is not going away. To shut these places down, the demand will still be there. We need to address the systematic poverty that creates these systems where people are exploited. Government has a role to step in and regulate these industries. Regulations that are in place are not doing what they are intended to do, but leaving these to the dark web wouldn't help. Winnipeg is a place where homophobia is deeply rooted. This is the only option for many people for labour.

5. **Discussion topic 2 - If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of workers?**

- They're not workers. Please stop referring to them as workers.
- They are not workers. They are vulnerable persons. This is legitimizing the violence against vulnerable people. They are there against their will. We need to address the issues that lead to

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

human trafficking. Human trafficking needs to be understood. These places are a conduit to violence against women and boys. This isn't business. This is crime. Why do we endorse violence against women and girls? The root causes need to be addresses. The City needs to take an active roll in contacting the Provincial and Federal counterparts to address the root causes. The City needs to take leadership to work collaboratively. There's no monitoring of these places because there is no money to do it. We have to change the wording.

- You can't make it safer. There is no way to make it safer. We asked survivors during national taskforce, where are you being trafficked? All said in massage parlour/escort agency/strip club. These venues participate in trafficking. There is no way to get around the criminal element of the people who are exploiting others for profit. Even in regulated environments, they still operate on "the customer is always right" not on the safety of the women and girls in these places. They are constantly victimized. What's the cost of doing nothing? Cost to health care, justice, etc. Does the City want to be responsible for normalizing the violence? It is illegal, today, to buy sex. The City is on a slippery slope when creating standards for criminal activity to take place. Have you consulted with the lawmakers?
    - With respect to the by-law, it did go before our legal services to make sure the City isn't going against Federal law.
    - How do you reconcile every other major jurisdiction in Canada licences these places?
- All labour, particularly low-paid is going to be exploitative. It's important to recognize that adults in this industry, there are some that are workers and needs to be acknowledged and we can't throw everything into sex trafficking and assume everyone has been forced into this. The intent of the by-law is being overshadowed by youth, Indigenous women and girls are being exploited. This is an industry that is not going away. There are no girls working in this industry-those are victims. Demand for transwomen – driven by transphobia. Demand for male escort agencies – driven by homophobia. Exploitation needs to be ended but government has a role to play in regulation.
- Make sure people employed in this industry are in fact meeting the requirements – there needs to be sufficient enforcement. Make sure children aren't being exploited in these places of business.
- We are Winnipeg – let's take leadership here. We are in conflict with the law. They city is at risk as this opens the City to legal implications. There needs to be realistic analysis of what is going on.
- The majority working in these places are underage. There are cities taking a close look at this. The public is now getting involved – families don't want kids to be put at risk.
- With different jurisdictions across Canada, there has been awareness raising about these harmful government policies. Only province with a strategy to address sexual exploitation.
- There's no way to separate who is vulnerable. There is a common theme that creates vulnerability. Exploitations and victimization started when they were children. Children are profitable in these places and how they can make a lot of money. Under the guise of a "safe business" the victimization of children is happening. We need to have the full conversation to

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

address this. Be careful on final conclusions – when we start creating by-laws for a whole group of people when a small percentage of people who are not being victimized but most are.

6. **Discussion topic 3 - If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?**

    - City should put aside a fund to end gender violence, support sexually exploited people, support minimum income.
    - City needs to be ready to engage with organizations that support people that support this work and give funds to the people who will be picking up the torch to do the work that the City no longer will be doing.

7. **Wrap-up and thank you**

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

Stakeholder Session – Resource/Support Providers
Doing Business in Winnipeg By-law No. 91/2008
September 27, 2021

General Questions:

- How does someone get to be considered in the by-law right now? What parts of their body have to be displayed in order to be considered nude?
- Definition needs to be reworked.
- Surprised that there are no slides dedicated to Indigenous women and girls, especially after providing lots of information to the City to assist with these issues. This is why we're holding these sessions now, to get an understanding and hear from participants what this should look like.
- How did we end up here again…thought we did this already…what is the goal of these sessions? We were directed by Council to seek out more information. Will take this offline with Diane.
- Has done presentations and extensive research on this topic, why are we re-examining what we've already examined? City of Winnipeg is in contravention of Bill C-36. City is open to legal implications as such. Last person she pulled out of a parlour was 13. Current by-law is fiction…doesn't happen this way in reality. Why are we not starting today with moving forward, as opposed to starting with topics already covered? Trafficking with boys has increased over recent years.
- We didn't hit the mark with our recommendations the first time…need to revisit. By-law has been in place for a long time…need to ensure we're taking the right path. Information that you share has been/is being looked at.
- I'm hopeful. Over the years, we've heard words, but no action has resulted. Issues and problems have increased during the pandemic…safety of women, girls and boys is an increasingly huge risk.
- The feedback you have given us has prompted this process now, as it hadn't been contemplated in the past. We didn't hit the mark…but with your assistance, hope to do so to truly make foundational changes to the by-law.
- Take a step back and re-evaluate what the by-law review means and needs.

1. What are the advantages and disadvantages of licensing body rub parlours and escort agencies?

- No advantage at all to licensing for the victims. This by-law is fiction.
- The vulnerable are kids who need money, Indigenous persons, women, LGBTTQ2S+.
- The notion of 'must be 18 years of age' in the by-law is a joke.
- Licensing or not doesn't stop the issue from occurring.
- If you stop licensing, it moves the industry to sub-standard housing and the dark web.
- There is some level of safety in licensing; it shouldn't be taken away.
- If licensing is taken away, it will all happen in very dark places.

- Doesn't like the language used to describe this issue – it normalizes what's happening to the victims…individual acts of ??? rape. Don't water it down (calling them workers) and normalize it.
- End sexual exploitation and trafficking in our province.

- Stop minimalizing the violence that is happening – this presentation does this.
- Under the City's logo, the choice of wording will normalize violence.
- City is being sold one set of stories, but the reality is something completely different.
- With reference to not licensing, you cannot do nothing. Parlours won't disappear. You'll minimize the ??? of these criminal establishments.
- Licensing is not an advantage, but that doesn't mean the City is off the hook with respect to solving the root causes of sexual exploitation.
- Letting it happen and monitoring it is not a solution. This is victimization for life; a lifelong healing journey.
- What is the City's role in problem solving for persons who are forced to do things like this and are being taken advantage of by criminals?
- You cannot compare us to other cities…no other city has the largest Indigenous population…no other place has had the interest to solve poverty and the bigger issues that play into what we're discussing today.
- Solve the root causes!
- Not as simple as what everyone else is doing. Winnipeg is unique.
- Let's be realistic, this is not going away.
- Shutting down won't work; must address root causes.
- Acknowledge the harm that systemic poverty creates.
- Regulate industries, don't leave it up to the free market.
- Regulations in place are not doing what their intended to.
- Leaving it up to the dark web is not the answer.
- Homophobia is deeply rooted in Winnipeg.
- Trans folks and others are shut out of the labour market.

2. If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of workers?

- They are vulnerable people, not workers. Stop legitimizing this topic.
- They are taken against their will; especially youth (18 and under).
- Violence against women is not ok.
- All 3 levels of government need to be involved.
- Human trafficking needs to be understood.
- The agencies and parlours allow crimes against the individual.
- General public doesn't buy that the by-law protects the victims.
- Address root causes – by all 3 different government jurisdictions.
- City needs to take an active role in getting those discussions going.
- We are not addressing Winnipeg's issues on this subject of violence against women and the vulnerable.
- This is Federal jurisdiction for sure, but the City needs to take a leadership role to work collaboratively with Feds and Prov; we should address root causes in a meaningful way.

- If you continue to talk about basic things like the by-law offers, we know you don't have the money to monitor…by-law is offered out of sheer ignorance or is very outdated.
- This will not go away.
- Please stop calling them workers.
- You (City) cannot make it safer.
- We've asked survivors where they were being trafficked most - massage parlours, escort agencies, strip clubs.
- They agreed, no way to get around the criminal element, so you can't regulate it to make it safer.
- If anything, you're making the pimps successful entrepreneurs.
- Not about safety; it's about the customer is always right. They're being constantly victimized.
- Cost of doing nothing? If you continue to ignore the sexual exploitation and sexual trafficking, the costs are associated with the healthcare system, justice system, etc.
- It is illegal today to buy sex. The City is on a slippery slope if you create regulations and standards for the industry to operate.
- This is a Federal law.
- How do you reconcile that every other jurisdiction in Canada regulates these areas?
- All labour is going to be exploited, and you will have victims of a crime. There are adults in this industry who are truly workers…not everyone is a victim of trafficking or exploitation.
- By-law is being overshadowed by the exploitation and trafficking issues.
- This may not be the place to discuss, but the industry is not going away.
- There are victims at adult level; women; but what about males, transgender folks? Driven by transphobia.
- How should this be regulated if we do regulate? We're avoiding the question here/getting off topic.
- Making sure the people who are employed in these situations are in fact meeting requirements, sufficient enforcement needed for this, make sure kids are not working, etc.
- Enforcement is huge. Capacity is needed.
- Per Winston's question about other jurisdictions…let's take leadership in Winnipeg. We're in conflict of Federal law.
- National Action Plan - cities could lobby for money to help with local efforts.
- Majority of persons in this industry are victimized.
- Other cities are re-examining their by-laws; public is getting more involved.
- Don't focus on licensing an industry where victimization occurs.

3. If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?

- Address all root causes; including homophobia, transphobia.
- Jurisdictional issues – Winnipeg has the only provincial strategy in the country.
- We know more because of the work done by community – victim-led prevention, intervention, grassroots, campaigns, etc.
- A lot of the standards and research looked at nationally comes from Manitoba.

- No way to separate who's in it and who is vulnerable. Common theme when sexual exploitation occurs is that the victimization started when they were children. Need to keep them safe. Children in this industry are very profitable. Very common story and reality.
- Have to have the full conversation with proper supports in place or people will slip through the cracks.
- Survivors talk about defending the industry while they're in it for justification reasons. Let this guide you as you move forward with the by-law.
- Most are being victimized, small percentage not.
- Take leadership on guaranteed liveable income; funding for sexually exploited individuals; address why people are forced into the industry.
- If the City of Winnipeg is going to get out of licensing, be ready to engage with the industry to support the people working in them, give funding to people who will pick up the work others can do.
- It is community that drives change. That's why we're here today.
- It would be great to live in a city where people weren't for sale.

Doing Business in Winnipeg By-law Review – Indigenous Organizations

Location:	Online - Zoom	**Date:**	September 28, 2021
Attendees:	3	**Time:**	1 p.m. – 2:30 p.m.

Meeting Notes:

1. Welcome and Introductions

2. Group Discussion

- Provided some background information on provincial strategy to end sexual exploitation and sex trafficking.
    - Had since late 90's.
    - Invests 11 million annually to address sexual exploitation – from education, to training, helping women and girls impacted to rebuild their lives, etc.
    - Key component was changing the language.
    - Often, uninformed people will say "child prostitute, juvenile prostitution" but those terms are incorrect. Often gives the image of an older person, someone "up to no good" running around and there is a pimp or john present and they are putting themselves at risk because of the choices they're making.
    - When we change the words to "child abuse" we think of someone younger, there is a perpetrator, someone is harming the child, there is an immediate need to stop the abuse. In society in general, when we use words like that, when we are describing a 15,16, 17 year old, we are minimizing what is going on by using "juvenile prostitute." They are being abused, victimized by offenders.
    - Same thing goes for "child pornography." These words minimize that this is a crime scene of a child being abused.
    - "Sex industry" describes all the components of who is involved of sexual exploitation for the purpose of profit. We have been brainwashed to think that the sex industry is between two consenting adults, but that's not the lived experience of most survivors. It is key to describe it as an industry.
- Sexual exploitation and sex trafficking are two different things.
    - Sexual exploitation is the exchange of a sex act or something else (place to stay, food, drugs, etc.).
    - Sex trafficking requires a third party—a trafficker or pimp. Those are the people responsible for the luring, recruiting of women and girls into the industry for the purpose of profit. They are motivated by money, greed, power. Operate on basic principle of supply and demand.
- Where does this align with the law?

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- For sexual exploitation – it's illegal to buy sex but not supply sex. We recognize if you're a woman who is being exploited because you can't pay rent, you are not a criminal and shouldn't walk away a criminal. Nordic model – you charge the person buying, not the person selling.
- A trafficker is the same thing as a pimp. With the law, sex trafficking (under human trafficking) is an indictable offence. Only law since 2005.

- Winnipeg has the most visible sexual exploitation of women and girls and has the most indigenous sexual exploitation on the streets.
- When we call it sex work or sex trade, implies working, trading something of fair value. But with sexual exploitation, there is a power imbalance, and it benefits men. This is not women empowerment. She is not in control of the situation. It clouds the issue and normalizes violence.
- There is a common theme among survivors.
  - When we look at sexual exploitation and trafficking along the continuum—something happened to her as a child—some sort of trauma.
  - When she became 13-ish (average age), there is a unique vulnerability where a trafficker knows how to pick this person out of a crowd. Anywhere there's a lot of young people with little supervision, you will find manipulators recruiting young girls. Usually from 13-25. There are a number of things that can happen.
  - When reach 25, they are less valuable. Men want younger women. If the trafficker sees value, he may keep her on as an "employee" who will do the errands, recruiting, doing chores, etc.
  - Second thing that can happen, families can pay an "exit fee". Trafficker can say they've been providing for them (food, housing, clothes, drugs) and now you owe me money and you have to pay me back for that.
  - Third thing - women will end up in the survival sex industry. If you've been under the control of a trafficker, this is all you know.
    - The trauma done to their body at 25 is extensive. Often drug and alcohol addicted. Trauma also done to their minds.
    - Many believe this is all they are worth and do it on their own, often living day to day, trying to find a place to stay, eat and pay for their addictions.
  - Fourth thing – they could be murdered by 25, or commit suicide. The fifth thing that can happen, become committed to healing journey.
- Why are men buying? Why don't they get an escort? Why are they targeting very vulnerable women?
  - It's rooted in privilege.
  - Part of their sexual fantasy to be very in control, in power, of someone they see as less than human.
- This is getting worse and the girls are getting younger. It is also moving online. Becoming less visible on the street.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- More people are profiting of sexual exploitation and trafficking of women and girls.

- Story shared about a person working in these types of businesses that was murdered.
  - These things are still happening.
  - If we can't even make sure our indigenous women and girls are safe taking a cab, how can we be sure the children are being kept safe in these places.
  - Grassroots organizations are working hard to keep our women and girls safe, and when we talk about licensing, it makes it scary for the grassroots organizations.
- We all need to work on guaranteed livable income and solve violence against women and girls. And not promote selling people or body parts.

3. Wrap-up and thank you

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

Stakeholder Session – Indigenous Organizations
Doing Business in Winnipeg By-law No. 91/2008
September 28, 2021

1. **What are the advantages and disadvantages of licensing body rub parlours and escort agencies?**

- Story of a body rub practitioner that was murdered here in Winnipeg; was involved in one of the establishments that we're talking about today.
- So many grassroots organizations are working and trying so hard to keep these women safe; and the notion of the City licensing these places is extremely scary.

2. **If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of workers?**

-

3. **If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?**

- Manitoba and Ontario are the only 2 provinces that have strategies on sexual exploitation (Ontario only since 2016).
- Our province invests $11M annually – for all types of initiatives related to sexual exploitation and trafficking.
- Key for the strategy was to change some language.
- Juvenile prostitute – gives the wrong impression. We think of a bad kid gone wrong. Pimp or John present. Putting themselves at risk by choice.
- Reality – is contrary. It is and should be called child abuse. Someone younger, is being harmed/abused, and an offender is present.
- We end up minimizing the exploitation and abuse with the wrong language. Under 18, it is nothing else but child abuse.
- Child pornography – is really a crime scene of a child being abused. The first minimizes the offense; the second is reality.
- Sex industry describes everyone involved in exploitation for profit; vs what we think it describes as a society.
- Exploitation vs trafficking: difference is a third party. Exploitation is an exchange of a sex act for something (money, food, ride, home, drugs, etc.). Trafficking involves a third party; pimps, trafficker, boyfriends – who are responsible for the luring and control of women into the sex industry for the purposes of profit. Traffickers are motivated by money, greed and power.
- Demand dictates supply.
- Business component – pimps motivated by money. Consumer component - people motivated by power, control and sex.
- Alignment with the law – exploitation is illegal to buy but not illegal to sell.
- Lived experience (women) should not be punished for needing to sell themselves to pay rent, eat, etc.

- Sex trafficking is an indictable offense…near the top of violent crimes (included in human trafficking).
- Still building case law…don't have a lot of cases go through courts.
- Sex industry is very rationalized; targets vulnerable; demand is there.
- A girl with an intellectual disability will garner the trafficker more money. Industry meets the demand.
- In trafficking legislation, criminal provisions against the demand is not there but needs to be. Difficult and slow in coming, but being worked on.
- It's illegal to buy sex anywhere in Canada.
- Go after the source; the demand. Demand comes from all backgrounds – all kinds and all ages.
- No one has been charged for selling sex since 2014.
- Winnipeg has one of the Country's only counter-section exploitation unit.
- Lots of work done with the community.
- This city has the most visible sexual exploitation of women and girls, and most the Indigenous, and most visible on the street.
- Sex worker or sex trade is not appreciated language…worker and trade insinuate power and benefit of the woman. Not the case; it is the offenders that reap the benefits.
- If we don't correct language, we will normalize violence against women and girls and the vulnerable.
- Indigenous women and girls specifically:
- Every survivor has her own reality and story.
- Common themes and experiences:
    - Something happened when they were little- emotional, intellectual, sexual trauma.
    - Average age is now 13 for her.
    - Trafficker knows exactly how to pick her out of a crowd. Great power over vulnerable girl in a short amount of time.
    - From 13 to 25, she's under the control of a trafficker. Quota to be met each day or else – physical violence, psychological abuse, trauma bonding, etc.
    - When she reaches 25, five things generally happen.
        - Getting older, not valuable, but may keep her on as an employee (bottom bitch).
        - Secondly, families can pay an exit fee.
        - Thirdly, the women end up in the survival sex industry (usually addicted, traumatized, extremely vulnerable).
        - Fourth, they could commit suicide or are missing/murdered by this time. This is rooted in the power and control over women as opposed to getting sex.
        - Lastly, at 25 or a little longer, some of the women are on or are committed to their healing journey.
- Sexual exploitation happens younger for Indigenous women and girls.
- Violence perpetuated upon them is more extreme.
- Criminalized more often.
- Problem is not getting any better; getting worse. Girls are getting younger and younger. Normalization continues.
- We all have the power to be part of the solution. This is a completely preventable crime.
- Shift time and resources into addressing root causes.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

Doing Business in Winnipeg By-law Review – Governments and Associations

Location:	Online - Zoom	**Date:**	September 28, 2021
Attendees:	5	**Time:**	3 p.m. – 4:30 p.m.

Meeting Notes

1. **Welcome and Introductions**

2. **Presentation**

3. **Q&A**

- If this by law is not passed, will the one in place right now remain?
    - Depending on what recommendations are put forward, one could be to abolish this section of by-law or could put forward changes.
- How does this differ from the existing by law?
    - What was presented today is the current by-law. What we are consulting on today is what potential changes could be to the by-law
        - So you are asking what could be changed?
            - That is correct.

4. **Discussion topic 1 - What are the advantages and disadvantages of licensing body rub parlours and escort agencies?**

- Advantage – it's easier for law enforcement to address when there are reports of elicit activity. It's a way to get in touch with the workers. Helps build relationships, learn what's going on and create a safer community to help protect those who are vulnerable.
- Disadvantage - if establishments are fined, they may not let the City know when there is a problem.
- Advantage – few licenced escort agencies but the people in body rub parlours are often escorts.
- Disadvantage – the zoning is limited to downtown. Many body rub parlours call themselves "health spas" so they can work outside the Downtown area and aren't covered in the by-law.
- I can see some aspects of the by-law as intimidating. They need a criminal record check, and could feel subjected to police surveillance if they must provide details of where and when they are operating.
- Is it accurate that there are a number of body rub parlours that are operating under the guise of a massage therapy clinic?
    - Often they are right down the street from a registered massage therapy clinic.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- There are daily reports of massage therapy members being asked for services they do not provide.
- Some parlours may have one out of province RMT on staff, and everyone else are body rub practitioners.
    - Perhaps the by-law could note that they are not permitted to have an RMT on staff.
- The name change to body rub parlour in 2008 was to help reduce confusion (was previously called body massage parlour).
- Advertising is not allowed of body rub parlours.
    - If not currently allowed, how are they able to advertise on Kijiji? That is where most of the inappropriate advertising for body rub parlours masquerading as RMTs is found.
    - The current by-law is structured around brick-and-mortar businesses and not online businesses.
    - There doesn't seem to be a way to manage the online advertising. There is confusion on what services these businesses provide.

- New Zealand has decriminalized and protected sex workers under labour law. Indigenous sex workers have reported better relationship with law enforcement and less violence.

5. Discussion topic 2 - If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of workers?

- Suggestions that were in the proposed by-law were a big improvement including:
    - Cameras;
    - Reduced fees; and
    - Education and awareness before getting a license.
- A lot feel it will be a safe job, but education can help them be aware of the risks.

6. Discussion topic 3 - If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?

- I'm not sure it would make any difference at all for escorts because it sounds like most escorts are not licensed.
- If by-laws stay in place, how will they be enforced?
- They have helped as a deterrence in the zoning area. Most difficulty is with the businesses outside the zoning area.
- Yes, there are people who are working independently, but there is a lot of coercion, a lot of the Indigenous community who are being brought into the lifestyle. Concern with not having a by-law, they will be more at risk.
    - How does the zoning part work?

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- You would want to see a wider zone?
    - Yes.
- If there were no longer a license or it continued with no changes, there will continue to be misinformation that puts RMTs at risk of being sexually harassed and assaulted.
    - Almost 75% of RMTs in national survey were sexually harassed on the job. This is a growing concern.
    - Protecting vulnerable persons is important.
    - Stronger guidelines for adult-oriented businesses is important because misleading advertising that puts RMTs at risk.
    - Customers are also going in for what they think is a legitimate massage and they end up being assaulted.
- I'm not sure how the City could define massage in the by-law so body rub parlours couldn't use the word "massage".
    - Maybe the by-law can define a therapeutic massage and a body rub and ensure body rub parlours don't use the word massage.
- No one currently regulates Kijiji and not just in the context of massage.
    - Other cities don't have by-laws to regulate online advertising.
- The by-law helps the City investigate complaints and ensure safety of those working.

7. Wrap-up and thank you

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

Stakeholder Session – Governments and Associations
Doing Business in Winnipeg By-law No. 91/2008
September 28, 2021

General Questions:

- If the bylaw isn't passed, does the one in place remain? Depends on consultations and feedback received.
- Are there significant changes being proposed? We're asking what could/should change, if anything.

1. **What are the advantages and disadvantages of licensing body rub parlours and escort agencies?**

- Advantages are that law enforcement can better address complaints of illicit activity.
- Way to get in touch with the workers.
- Escort agencies – hardly any are licensed. Usually find that workers go between both parlours and agencies.
- How effective is the by-law currently? Not many places licensed. Zoning of this by-law is limited to downtown. Businesses outside of that area are not included (usually call themselves spas).
- Community engagement is critical; education; engagement with sex trade workers is how we operate. By-law is a way and means to find out what is going on and to be able to protect the vulnerable.
- The zoning issue is restrictive. More vulnerable and communities at risk when we can't reach them.
- We brought a report forward to Council earlier this year, intended to provide further safety measures. Council directed us to explore further.
- Can see that some aspects of the by-law sound threatening to frontline workers; as well as being subject to police surveillance which can be used to help or punish workers.
- Number of body rub parlours licensed is 2. Are some operating under the guise of a massage therapy clinic?
- There is misinformation and communication in the community relative to massage therapy and other types of massage.
- Can we ask the parlours not to use the term massage therapy and only use the term body rub…call it what it is? The parlours may have one person who is an RMT (licensed here or out of province). Parlours shouldn't be allowed to have any RMTs on staff.
- If advertising is not allowed, how is it that it occurs? Body rub parlours advertise massage therapy on online marketplaces.
- We don't have control over what is on the web.

2. **If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of body rub practitioners and escorts?**

- Likes the suggestions in the proposed by-law; cameras, education and awareness prior to licensing (better understanding of what goes on may deter participation).

- Should sex work come under labour legislation? Indigenous sex workers in New Zealand report much better relationships with the police; has created a safer environment. We're a long way from this though.

3. If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?

- From a public health perspective relative to escorts, sounds like most are not licensed so not much would change. They are undertaking an activity that is generally criminalized from the purchaser's perspective.
- If the by-law stays in place, how can we enforce it better?
- By-law has been good as a deterrent in the downtown area. Our problem is with the scope of the zoning.
- Some folks have chosen to work in this industry; however, most, and especially Indigenous folks, have been coerced.
- Concern is that if there isn't a by-law, more harm can come to the workers. Big advocate of the educational component.
- What do you mean about outside of the zoned area? Outside of downtown?
- If no longer licensing, it will lead to continued and expanded misinformation out there, false advertising; and registered RTs being more and more open to false expectations and assault.
- Support what will protect vulnerable workers. Want to see the police have more authority to assist. Clear guidelines for the agencies must come forward for clarity and risk reduction.
- There is a concern about how to properly define 'massage' in a by-law.
- Can we legally enforce agencies only using body rub, and not use the term massage?
- Sometimes the opposite occurs…public go into one of the suspect establishments thinking they're getting massage therapy, and are sexually assaulted.
- Once RMTs are regulated, the by-law could clearly define massage and body rub and definitively draw the lines … reduce conflict and increase enforcement.
- Not all treatment RMTs offer is massage. Could present problems too.

Doing Business in Winnipeg By-law Review – Body Rub Practitioners and Escorts (lived experience)

Location:	Online - Zoom	**Date:**	September 28, 2021
Attendees:	6	**Time:**	9 a.m. – 10:30 a.m.

Meeting Notes:

1. **Welcome and Introductions**

2. **Presentation**

3. **Q&A**

- Can you discuss the definition of harm reduction that you are using?
    - We don't have a set definition in place, but we want to hear from you what harm reduction means to you. We want to learn from you folks.
- You use harm reduction in your initial report, do you have a working definition of what you were using?
    - We want to know what measures we could put in place to provide safety
- What were some of the key municipalities you reviewed in your scan?
    - Edmonton, Toronto, Hamilton, Calgary and Regina or Saskatoon.
        - Any reason you left out Vancouver?
            - We did review all across Canada, we worked directly with the five
- What's up with the dress code that some restaurants would be in violation of?
    - That's currently what's in the by-law.
        - Those weren't in the recommendations to change?
            - No, those weren't recommended to change.

4. **Discussion topic 1 - What are the advantages and disadvantages of licensing body rub parlours and escort agencies?**

- My choice to work at a parlour is a harm reduction measure in itself. I appreciate that it is anonymous. I don't want to go independent. This is a safe work place for us. I trust my coworkers.
- I think the Federal laws right now prevent women from working together. Me working in a business, it's offensive being told that we could be part of trafficking. This is how I pay my bills.
- I want to be clear, if we aren't licenced, we aren't going to save any vulnerable people. Everyone who works here will be unemployed. I don't know why people who are against the industry are part of the recommendations.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- I agree completely. It needs to be easier to get escort agency licences. I've been doing everything I'm supposed to do and it shouldn't be taken away. If anything, it should be easier to get the licences and taking them away isn't going to sold anything.
- It should be easier to get licenced and easier for me to open my own facility, to choose where I operate. I want to make sure girls are safe and comfortable.
    - No one here doesn't want to be here.
    - Everyone is screened before they work.
    - If there was a thought to take away anything that would protect the girls is obscene. Manitoba is behind and we should catch up because it would make everything easier for the girls in the industry, so we can provide safe spaces.
- The main difference is the overall attitude. Edmonton has other 30. From what I saw, it was easier to go independent and operate in other areas. Here, we cannot leave our location and if we were to shut down, there are no plans from the City to move our licence.
- The people who are going to keep us safe are not people creating by-laws about how long our skirts need to be or go to training. The people who are keeping us safe are the people running the businesses. Those are the people who know and keep us safe. Some of the new rules seem geared towards police surveillance and not true safety.
- Which buildings we are allowed to operate out of seems to be arbitrary and the rules don't make sense.
    - The zoning process is different, but the licence indicates that they need to be in the downtown. One of the recommendations that we put forward was to expand that area.
        - It should be easier for us to move to nicer areas and nicer buildings.
- Why do escort agencies need an office Downtown when they can't operate out of the office? This requirement doesn't make any sense.
- The penalty for not having a licence in the Doing Business in Winnipeg By-law is the highest for adult businesses. Is that going to change?
    - Fines are always reviewed. Linked to trying to provide a safe space.
        - This goes to how those of us in our industry are viewed. And implies that we are bad or undesirable.
            - One of the issue we deal with are businesses operating without a licence. We will take a look at that.
- It should be easier to get the licences. There are a lot of hoops to jump through so those who want to operate can make it a legitimate business.
- We need to explore the independent escorts in a little more detail. It's key for us to talk about this.
    - There are some who may not be able to afford or get a licence under the current structure. This may be the only source of income and it can be a barrier to our most vulnerable in the industry who can't afford to get a licence.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

    - The fact that people have to be licenced is bananas. To have a group of individuals targeted is surveillance.
- Body rub parlours and practitioners may not necessarily be involved in sex work yet can't work outside of the Downtown.
- When we found out this was happening, we thought our attendants would no longer have to be licenced. I don't support independent girls having to be licenced. When the police come in, it's like harassment. We want to keep business licences and support more opening, but we feel the individual licences are an invasion of privacy.

5. Discussion topic 2 - If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of workers?

- I assume you are talking about cameras, surveillance, etc. when you reference safety. We already have these in place.
    - Any other things, i.e. a panic button, if something were to happen, there wouldn't be enough time to hit a panic button. Those things should be up to businesses. Businesses know best and should be left alone.
    - Unless you have worked in this industry, you have no idea what you're talking about. The people who should be allowed run these places are the ones who have been on the front-line.
    - Make the licences easier to obtain, businesses easier to open, and increase the areas where businesses can operate to make things safer.
    - Those who work in the industry know best how to make it safe.
    - Are there any additional measures you would support?
        - We believe girls who have experience should be given priority. There should be a screening process of who should be able to operate. Not just any criminal, but girls who are in the industry and can prove they will keep girls safe and know how to.
- The idea of safety has been brought up a lot. There aren't any big safety issues right now in our place of work that can't be addressed on their own.
    - Police harassment is the biggest concern.
- If there is no issue with safety, if it's coming from the City, the police, we need to talk about that. There are things we do on our own that keep each other safe. If there could be funds to support that, that would be great.
- I don't think the measures are for safety as much as they are for surveillance.
- I don't feel safe getting licensed if I have to provide my information, knowing that it will go to the police. They're not interested in my safety. They're interested in collecting my information.
    - I don't understand why they need my address, my photo, etc. I cannot see how that's keeping me safe.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- I would like to be kept safe from the police and by-law harassment.
- When a license check is done, the police enter the building under the pretense of making sure our licenses are up to date. They show up in plain clothes, they try to photograph us, want my driver's license, email address and ask for things they already have.
- I've been partially followed home by undercover police. They will open doors, don't care if you're changing.
- I don't think the police are trained to deal with us. They make us uncomfortable. In other cities I've worked in, the police are not like that. If there's a safety issue, it's the police.

6. Discussion topic 3 - If the City no longer licensed body rub parlours and escort agencies, how would this impact practitioners?

- I find it weird that the City checked in with other provinces is considering taking the stance of prohibition. What would happen to my job if the licenses were taken away?
  - We are here talking to you to help us make recommendations to Council for them to decide.
- I would like it to be noted how much revenue it would bring in if you would allow more body rub practitioners and the politicians need to be aware of that. We will pay taxes. Make it easier for us, we will open up. Do not take it away from us.
- I agree the same thing. The City would get more revenue.
- What would happen if my license is gone?
- Appearing as a delegate in front of Council is a situation that is highly confrontational. You are asking people to out themselves and their work. Some are legal, some are not. This doesn't create a safe space for anyone here to come to Council to speak.
- I hope the City is brave in this. You are talking about harm reduction. If you don't allow these businesses to operate, you take away the safety. Message to Council – be brave. Trafficking is not happening in these places.
- You have an important job to make sure you reflect what we are telling you. You are responsible because you are writing the report and this may be the only time we feel safe bringing this forward.
- The first offence, is a fine of $500 for practitioners plus the license fee. For everyone else, it's the cost of the license fee. Why wasn't this reviewed when the City brought forward recommendations?
  - We did take a look at licensing fees but not the fines.
  - I understand your point. The difference is all our other licenses are over $500. The only that are less than $500 are escort and practitioners. E.g., Pawn shows are $1,350.
  - I'm not saying we can't look at the fines. Our main focus was to look at the licensing fees to make it easier. Reducing fees, removing police record check, removing photo requirement. Our goal was to make it easier to get licensed.
    - Let's not pretend that it's not there because it's for adult-oriented businesses.

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

- The police don’t know better than ourselves.
- Making the license fees less helps everyone.

7. Wrap-up and thank you

Note: These meeting notes are the opinions of stakeholders and not the opinions of the City of Winnipeg.

Stakeholder Session – Body Rub Practitioners and Escorts (lived experience)
Doing Business in Winnipeg By-law No. 91/2008
September 29, 2021

General Questions:

- Definitions: what is your definition of harm reduction? We want to identify what harm reduction means to you.
- You used that term in your report…you don't have a definition for it? Don't have it in front of me.
- WRHA has a working definition you should check out.
- What municipalities did you review? Focussed on five of them – Edmonton, Toronto, Hamilton, Calgary, Regina/Saskatoon(?)
- Why would you leave out Vancouver – they have a robust system? We did look at many major municipalities, but focussed on five.
- What is up with the dress code in the by-law (skirt length)? Is this old? That is what is currently in the bylaw. We did not make a recommendation to change it.

1. What are the advantages and disadvantages of licensing body rub parlours and escort agencies?

- It is a choice to work at a parlour; it is a harm reduction choice. It's anonymous. I'm a licensed body rub practitioner. If you take away licensing, it takes away my safety.
- There is trust, no drugs, safe, no theft, personal relationships with staff - to insinuate that this might turn into a trafficking situation is offensive.
- This is how I pay my bills; don't take my livelihood away.
- You're not going to save vulnerable people if you do not license…. we'll be out on the street. Advocacy groups who want to remove licensing shouldn't have a voice. It won't stop trafficking.
- I am the only independent licensed escort at the moment. Make it easier to get practitioners and establishments licensed.
- I follow all the rules. Taking them away is ridiculous.
- We manage and provide a safe space for our employees. Should be easier for me to open my own establishment and get licensed. I should be able to move around.
- Goal is to ensure all girls are safe and comfortable. All our girls want to be here every day. We have solid screening in place.
- Edmonton – has over 30 licensed establishments; easy to go independent; no space limitations; able to open parlours; complete opposite of City of Winnipeg, which is not friendly at all.
- People who will keep us safe in this industry are not the people making by-laws that speak about skirt length and want us to be trained.
- Safety comes from the establishment owners and licensed parlours.
- (WPS) tools in place seem more like surveillance than safety.
- Not all sex work is exploitation…you can't *just* listen to that.
- Office space – we couldn't even move around in the same building. City makes it difficult for no real reason.

- Zoning process is different. By-law is clear in that you have to be in the Downtown area. We asked for a review of the zoning piece.
- If I wanted to move my establishment two doors down from where it is, the City would refuse.
- Should be able to move to nicer buildings and areas. Stuck in the old red-light district.
- Independents can't operate out of our own office; can only operate in the downtown area. What's the point of it at all?
- Penalty/fine for this industry is the highest out of all the other businesses, why?
- MBEA, fines are always being reviewed. Ensures businesses are following licensing rules.
- Why are the fines the highest for this industry as compared to all other businesses? Why are we being singled out? Are we bad, different? What is it? Cannot have businesses in other parts of the city…why are we being singled out?
- My fee for operating without a license, as an independent, is higher than all other businesses.
- Independent escort aspect should be explored more. Key to talk about this. Creates an unsafe environment. No one else in spas, etc., are required to be licensed…why us? What are the harm reduction measures? Not all body rub businesses and practitioners engage in sex work. Zoning is a big issue.
- The businesses should be licensed, not independent girls or employees. Skirt length is harassment. We don't support individual escort licenses – invasion of privacy.

2. If the City continued to licensed body rub parlours and escort agencies, what measures should be put in place to improve the safety of body rub practitioners and escorts?

- Safety – talking about cameras, screening clients, etc.? We already do this in our establishments. We are responsible for our staff and take it seriously.
- Hard to answer this question, as it should be up to practitioners and businesses to deal with safety. We work in the industry, you don't…you don't know what you are talking about, quite honestly.
- The City has no idea what they are doing when creating by-laws like licensing and zoning.
- Obviously, screening process should be in place; should be responsible people and have to prove safety.
- What would you look at as proof? Experience. CRCs. Bondable. General laws for businesses. Do not charge us obscene prices for this. Go after those that don't license or follow the rules. Don't turn a blind eye to the advertising, for example.
- Look for people who shouldn't operate, look for the business that advertise pregnant escorts! Places like that give us a bad name.
- Safety has been brought up a lot in your report and discussions. Is there a big safety issue for those here today in your areas? NO. Police harassment and by-law harassment are the biggest issues. not safety. If the issue of safety is coming from the City and WPS, lets discuss that instead.
- We work together to keep each other safe. That has nothing to do with by-laws. Do you want to fund our efforts to keep each other safe? That would be awesome.
- What do others on the call think about police harassment?
- I have been licensed for 10 years. I was left alone until the billboard went up, I was harassed by police under the guise of safety.

- I don't feel safe if I'm required to get a license as an independent; to provide my personal information that will end up going to the police. They're not interested in my safety; they're interested in surveillance. Why does the City need to know this? No other industry is required to provide that level of information. Keep me safe from the police and by-law harassment.
- License checks at a body rub parlour: police come in under the pretense of checking for up-to-date licenses. Plain clothes, don't announce themselves. They patrol where we go in our building. Photograph us. Want email addresses, driver licenses. I have been followed part way home but the WPS denies it was their staff; all of this behaviour is not appropriate. They are not qualified to be interacting with us. They don't know how to control themselves. They are passive/aggressive; condescending. Concerned with making us uncomfortable, not our safety. Other provinces don't do this. WPS is sketchy.

3. If the City no longer licensed body rub parlours and escort agencies, how would this impact body rub practitioners and escorts?

- License businesses, but not the staff / individuals.
- Safety doesn't come through licensing.
- Why would the City even consider this? We are concerned that the City of Winnipeg doesn't want to license. What would happen to my job in January if this happens?
- Council needs to consider all of this information and make decisions.
- You can appear as a delegation in front of Council to present if you choose, so Council hears directly from you. It's powerful. I will circulate the presentation and will let you all know when the report will be discussed at Council.
- How much revenue would it bring the City if you allow continued licensing? Politicians should know this. Make it easier for us to provide safety and we'll pay the government. Don't take this away from us.
- What happens to my license if the by-law is gone? What does this mean for me? What are the next steps?
- Come to Council in delegation? Can anyone tell me how many 8-year-olds work in their business? Absolutely none. So, you've invited us to come into a space that is confrontational, with people who believe crap like we're employing 8-year-olds!
- You're asking us to out ourselves in a place that will be littered with police. It doesn't create a safe space for us if we do this. What are you going to do about that?
- I can only imagine what the session was like with Police. We're asking the City to be brave in this. There have been no complaints around licensing about these businesses.
- Be brave knowing that the laws (Federal) being considered will be overturned soon; removing licensing is just bananas.
- You have an important job to convey our fears and thoughts; you have an important job to do to share all of this with Council.
- Individual persons – first offense fine is $500 plus the cost of the license fee. For everyone else, it is just the cost of the license fee. Why the inequity?

- The difference is that all other licenses are over the $500 mark; practitioner and escort licenses are around $350. EG: pawn shops = upwards of $1,300. Looking at removing pictures, reducing fees, making it easier for folks to get licensed.
- Let's stop pretending it's not this way because of the nature of our business.
- I hope you do share all of this with Council. I'd be nervous to attend, but may consider it.

Appendix C – Presentation

Doing Business in Winnipeg
By-Law No. 91/2008

Stakeholder Engagement Session

September 2021

Winnipeg

Land and Water Acknowledgment

I would like to acknowledge that we are on Treaty No. 1 Territory and the traditional homeland of the Métis Nation. Our drinking water comes from Shoal Lake 40 First Nation in Treaty No. 3 Territory.

Background

- The Doing Business in Winnipeg By-law was implemented on June 1, 2008.
- On September 26, 2019, Council passed a motion directing the Public Service to report back to Council whether additional regulations on certain forms of businesses will enhance the City's ability to address and maintain community standards resulting from specific business activities.
- Recommendations for the by-law were presented to Council in July 2021 to improve the health, safety, well-being, and protection of body rub practitioners and escorts in these establishments.
    - The recommendations were based on research on best practices and stakeholder feedback
- Council did not support the recommendations and directed the Public Service to report back within 180 days detailing how making business licenses available to adult orientated businesses reconciles and/or complies with the protection of Communities and Exploitation Act, and incorporate further consultations.

What We Heard So Far

- By applying a harm reduction approach as well as increasing regulatory tools, we are helping vulnerable and exploited people, and creating obstacles to prevent sexual exploitation and trafficking.*
- By licensing body rub parlours and escort agencies, we are encouraging these businesses and therefore increasing the risk for sexual exploitation and trafficking.*



*These opinions are of stakeholders and not the City of Winnipeg

Goals of the By-law Review

- Determine if licensing adult-oriented businesses reconciles and/or complies with The Protection of Communities and Exploited Persons Act
- Explore the advantages and disadvantages of licensing adult-oriented businesses
- Learn how licensing affects body rub practitioners and escorts of adult-oriented businesses
- Identify potential measures to improve the safety of body rub practitioners and escorts

Approach to the By-law Review

- Cross-jurisdictional scan
  - Looking at other municipalities in Canada and around the world to determine best practices
- Stakeholder engagement
  - Gathering input from stakeholder organizations, body rub practitioners and escorts





Timeline

June 2021
By-law Review Begins

September 2021
Stakeholder Engagement

Fall 2021
Develop Recommendations

January 2022
Council Consideration

January 2022 onward*
By-law Amended and Changes Enforced



About the By-Law

- The purpose of a licence is to regulate and control the activities of certain businesses to reduce risk in the following key areas:



Fire Safety

Crime Prevention

Enhance Safety for Vulnerable Persons

Increase Regulatory Effectiveness

Escort/Escort Agencies

- Escort
  - An individual who charges or receives a fee for acting as a date or providing personal companionship for a limited period of time
  - Escorts are only allowed to operate in a licensed Escort or Independent Escort Agency
- Escort Agency
  - A person who arranges an introduction between an escort and another person
  - A person who is the registered user and pars for a telephone number of internet website to arrange introduction with an escort
- Independent Escort Agency
  - An escort agency that is owned and operated by a single escort

Escort/Escort Agency Requirements

- Escorts
  - Escorts must not operate except through an agency
  - Must be 18 years of age
  - Must apply in person and provide all required information
- Escort Agency
  - Maintain records of the date, time, and place or location where the escort will meet the client or prospective client
  - Must apply in person and provide all required information
  - Must maintain a current list of all escorts employed or under contract
  - Must keep copy of all licences for every escort
  - Must make the documents available for review for enforcement officers
  - Must not arrange introductions between escorts and a client unless the escort is licenced
  - No persons under 18 year of age allowed on premises

Escort/Escort Agency Requirements

- Escort Agency (continued)
  - No alcoholic beverages are purchased or consumed on premises
  - No individuals exhibits himself or herself in the nude on premises
  - No signs visible outside of the premises shows any nude male or female body
  - No printed words on the exterior of the premises indicates that the service provided on the premises includes any form of sexual or nude entertainment

Body Rub Parlours and Body Rub Practitioners

- Body Rub Parlour
  - Any premises, or part of any premises, where more than one person carries on the business of a body rub practitioner
  - Parlours must be within the downtown zoning district
- Body Rub Practitioner
  - An individual who provides or offers to provide massages for a fee but does not include a medical or therapeutic professional who is limited to exclusively massaging of the feet, hands, head, or face
  - Applicants must be 18 years of age or older
  - Criminal Record Check is required

Body Rub Parlour/Practitioner Requirements

- Body Rub Parlour
  - Must apply in person and provide all required information
  - Must maintain a list of all body rub practitioners
  - Must ensure that no person other than a licensed body rub practitioner provides massages in the palour
  - No person under 18 years is on the premises, whether as an employee, client or otherwise
  - No alcholic beverages are purchased or consumed by any person on the premises
  - No signs visible outside of the premises shows any nude male or female body part
  - No words on the entrance of the premises indicate that a service provided at the body rub parlour includes any form of sexual or nude entertainment

Body Rub Parlour/Practitioner Requirements

- Body Rub Parlour (continued)
  - No individual exhibits himself or herself nude on the premises
  - Ensure every employee in the parlour is wearing clean, washable, non-transparent garments covering his or her body between the neck and no more than 10 cm above the top of the knee
  - Ensure no massage or other service within a cubical is fitted with a door capable of being locked
  - Ensure proper lighting and ventilation within the building

Body Rub Parlour/Practitioner Requirements

- Body Rub Practitioner
  - Must be 18 year of age
  - Must apply in person and provide all required information
  - Must not provide a massage or other service within a cubicle or room, booth or enclosed area that is fitted with a door capable of being locked
  - Exhibit himself or herself in a nude state in a body rub parlour

Stakeholder Engagement

- The City is reaching out to front-line workers, advocacy groups, and Indigenous organizations to gather input for the By-law review
- Input is being collected at stakeholder engagement sessions and an anonymous form for body rub practitioners and escorts
- The objectives are to:
    - Determine support and opposition to licensing body rub parlours and escort agencies
    - Understand the safety implications of licensing and not licensing body rub parlours and escort agencies with and without harm reduction measures
    - Identify potential measures to improve the safety of body rub parlours and escort agencies
- Stakeholder input will be used to develop recommendations that will be presented to Council this winter

Next Steps

- Summarize feedback received during stakeholder engagements
- Develop recommendations for by-law updates
- Council review of recommendations and opportunities for delegations in January 2022

Questions?

Discussion Question #1

What are the advantages and disadvantages of licensing body rub parlours and escort agencies?

Discussion Question #2

If the City continued to license body rub parlours and escort agencies, what measures should be put in place to improve the safety of body rub practitioners and escorts?

Discussion Question #3

If the City no longer licenses body rub parlours and escort agencies, how would this impact body rub practitioners and escorts?

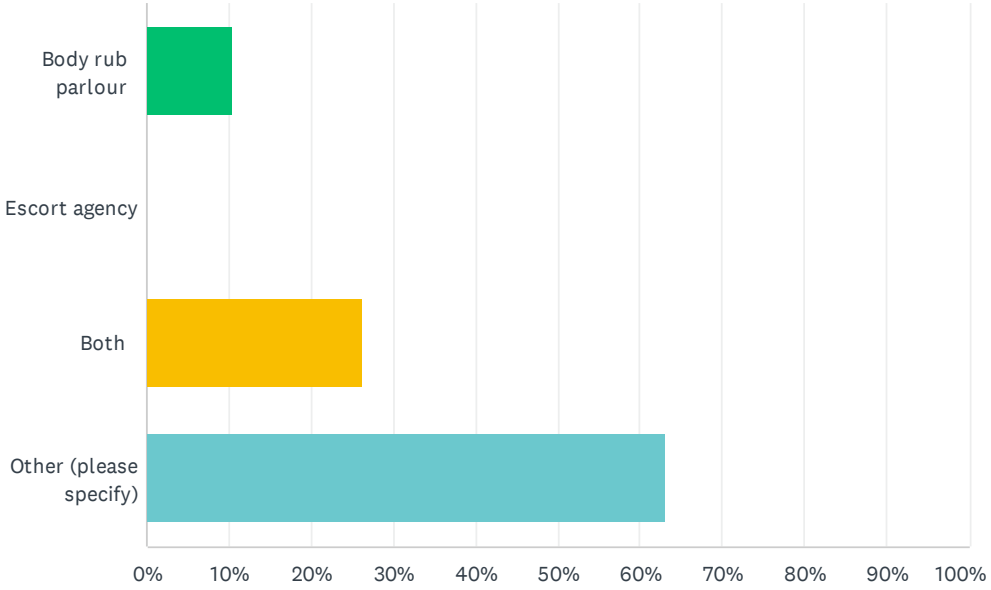
Thank you!

Winnipeg

Appendix D – Anonymous Form Submissions

Q1 Which of the following businesses do you work for?

Answered: 19 Skipped: 0

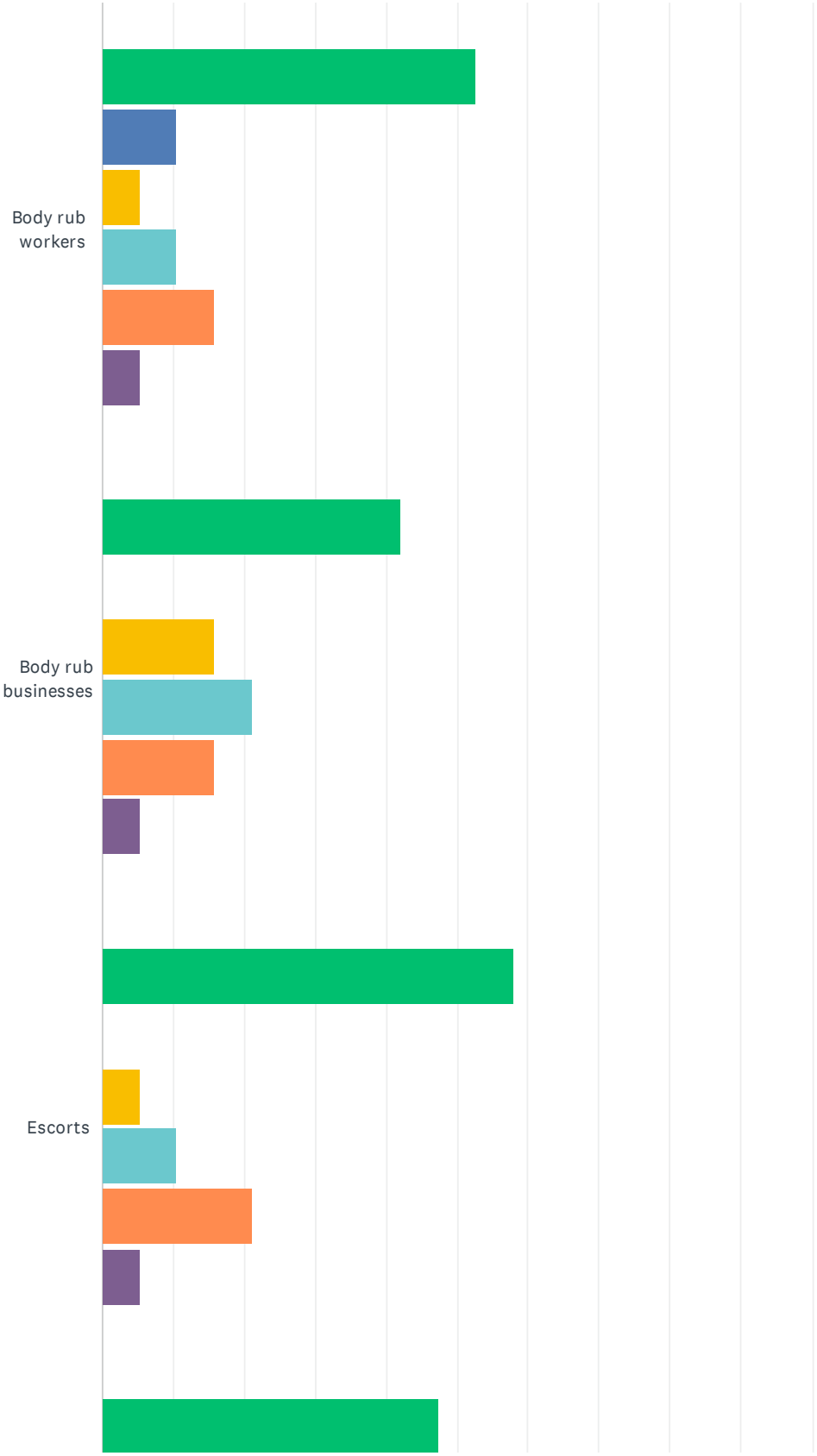


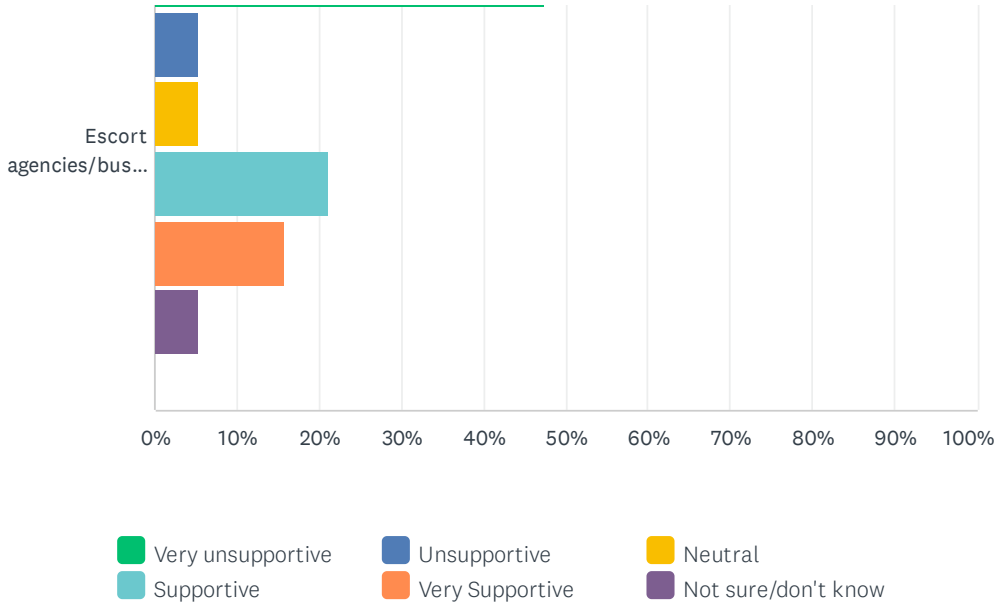
ANSWER CHOICES	RESPONSES	
Body rub parlour	10.53%	2
Escort agency	0.00%	0
Both	26.32%	5
Other (please specify)	63.16%	12
TOTAL		19

#	OTHER (PLEASE SPECIFY)	DATE
1	indigenous organization	10/4/2021 9:26 AM
2	Independent provider	9/30/2021 4:12 PM
3	independent escort	9/29/2021 5:10 PM
4	Self employed escort	9/29/2021 5:08 PM
5	T	9/29/2021 5:01 PM
6	Exotic dancer freelance not with agency	9/28/2021 5:30 PM
7	Independent escort	9/28/2021 10:11 AM
8	Stripper	9/28/2021 6:24 AM
9	None	9/27/2021 6:31 PM
10	Don’t work for, support for adult worker	9/27/2021 5:12 PM
11	Independent	9/27/2021 1:30 PM
12	I work for myself as an escort	9/27/2021 8:38 AM

Q2 Do you support the City licensing the following:

Answered: 19 Skipped: 0

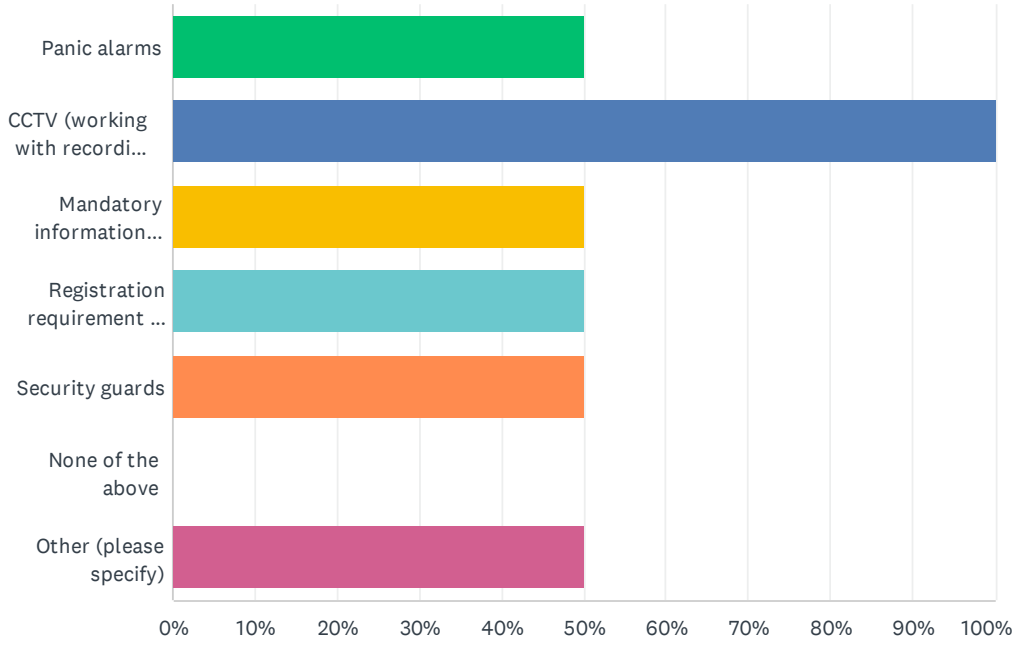




	VERY UNSUPPORTIVE	UNSUPPORTIVE	NEUTRAL	SUPPORTIVE	VERY SUPPORTIVE	NOT SURE/DON'T KNOW	TOTAL
Body rub workers	52.63% 10	10.53% 2	5.26% 1	10.53% 2	15.79% 3	5.26% 1	19
Body rub businesses	42.11% 8	0.00% 0	15.79% 3	21.05% 4	15.79% 3	5.26% 1	19
Escorts	57.89% 11	0.00% 0	5.26% 1	10.53% 2	21.05% 4	5.26% 1	19
Escort agencies/businesses	47.37% 9	5.26% 1	5.26% 1	21.05% 4	15.79% 3	5.26% 1	19

Q3 If the City continued with licensing body rub parlors, what measures should be put in place to improve the safety of workers? (Check all that apply)

Answered: 2 Skipped: 17

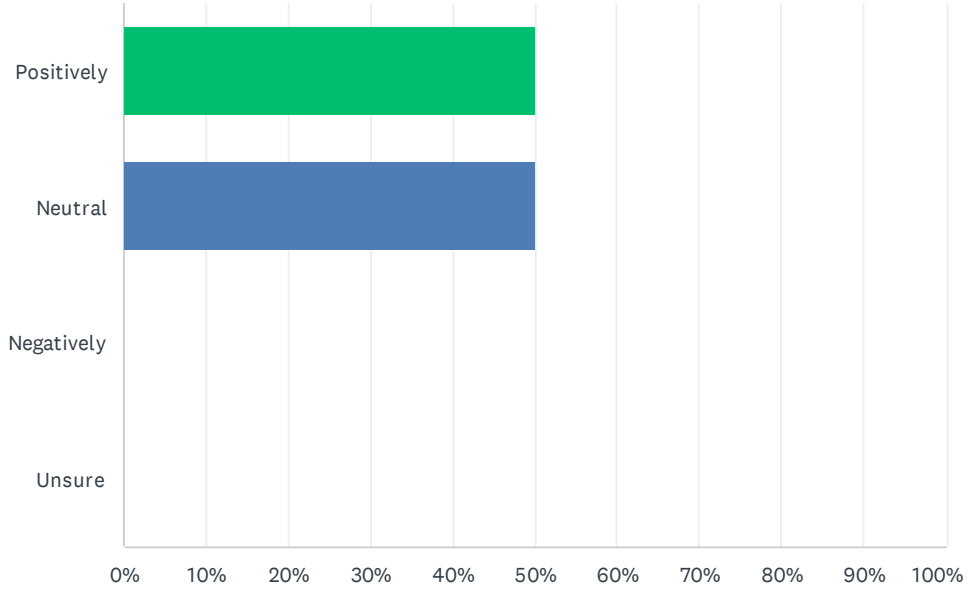


ANSWER CHOICES	RESPONSES	
Panic alarms	50.00%	1
CCTV (working with recording capacity)	100.00%	2
Mandatory information session as part of licensing	50.00%	1
Registration requirement for all staff (not licensed)	50.00%	1
Security guards	50.00%	1
None of the above	0.00%	0
Other (please specify)	50.00%	1
Total Respondents: 2		

#	OTHER (PLEASE SPECIFY)	DATE
1	Require a std test as registration from clients as well as a negative covid test and vaccination proof	10/8/2021 12:28 PM

Q4 If the City of Winnipeg no longer required licensing body rub parlors, how would this affect you?

Answered: 2 Skipped: 17



ANSWER CHOICES	RESPONSES	
Positively	50.00%	1
Neutral	50.00%	1
Negatively	0.00%	0
Unsure	0.00%	0
TOTAL		2

#	PLEASE EXPLAIN:	DATE
1	***Redacted***	10/8/2021 12:28 PM
2	The fees are unneeded, since Winnipeg Police come in freely and often to do their audits to ensure safety and compliance with laws.	9/15/2021 12:48 PM

Q5 If the City of Winnipeg no longer required licensing body rub parlors, how could the City improve the safety of workers?

Answered: 2 Skipped: 17

#	RESPONSES	DATE
1	more background checks / screening would be necessary. Std and vax id , but more freedom about how we conduct our business and make it legal to advertise our services. Also we should have resources to advertise online without the gouging going on right now on leolist. More mental health resources for us such as access to therapy.	10/8/2021 12:28 PM
2	All workers must carry photo ID, and are subject to police interviews upon police visits. Management and Police can also ensure everyone is sober. Police do a great job of ensuring safety as it is.	9/15/2021 12:48 PM

Q6 If the City continued with licensing escort agencies, what measures should be put in place to improve the safety of workers? (Check all that apply)

Answered: 0 Skipped: 19

⚠ No matching responses.

ANSWER CHOICES	RESPONSES	
Mandatory information session as part of licensing	0.00%	0
Registration requirement for all staff (not licensed)	0.00%	0
None of the above	0.00%	0
Other (please specify)	0.00%	0
Total Respondents: 0		

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

Q7 If the City of Winnipeg no longer required licensing escort agencies, how would this affect you?

Answered: 0 Skipped: 19

⚠ No matching responses.

ANSWER CHOICES	RESPONSES	
Positively	0.00%	0
Neutral	0.00%	0
Negatively	0.00%	0
Unsure	0.00%	0
TOTAL		0

#	PLEASE EXPLAIN:	DATE
	There are no responses.	

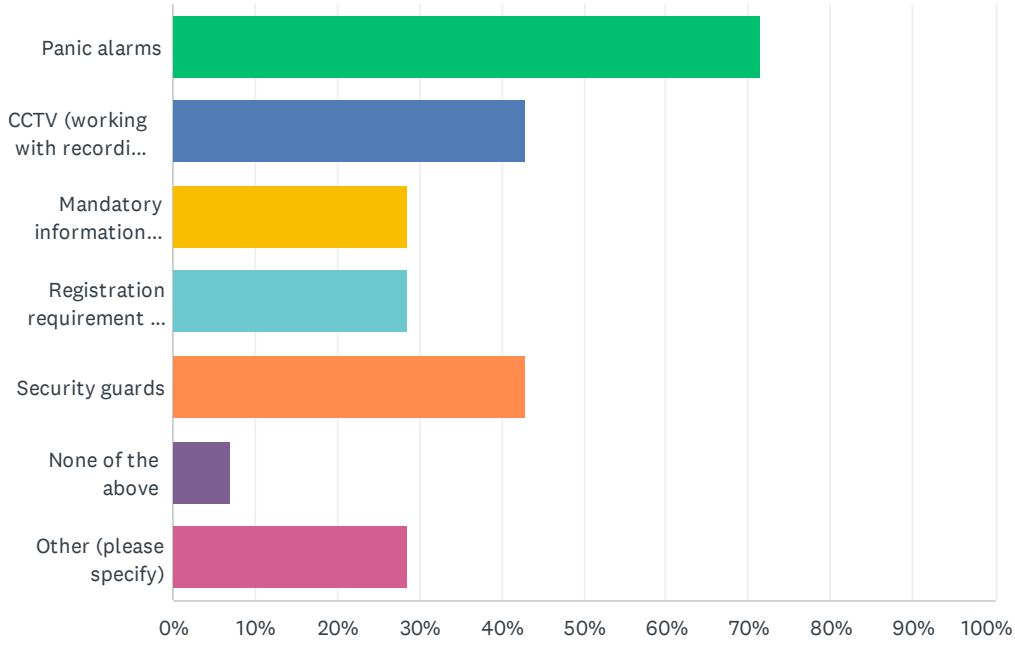
Q8 If the City of Winnipeg no longer required licensing escort agencies, how could the City improve the safety of workers?

Answered: 0 Skipped: 19

#	RESPONSES	DATE
	There are no responses.	

Q9 If the City continued with licensing body rub parlors and escort agencies, what measures should be put in place to improve the safety of workers? (Check all that apply)

Answered: 14 Skipped: 5

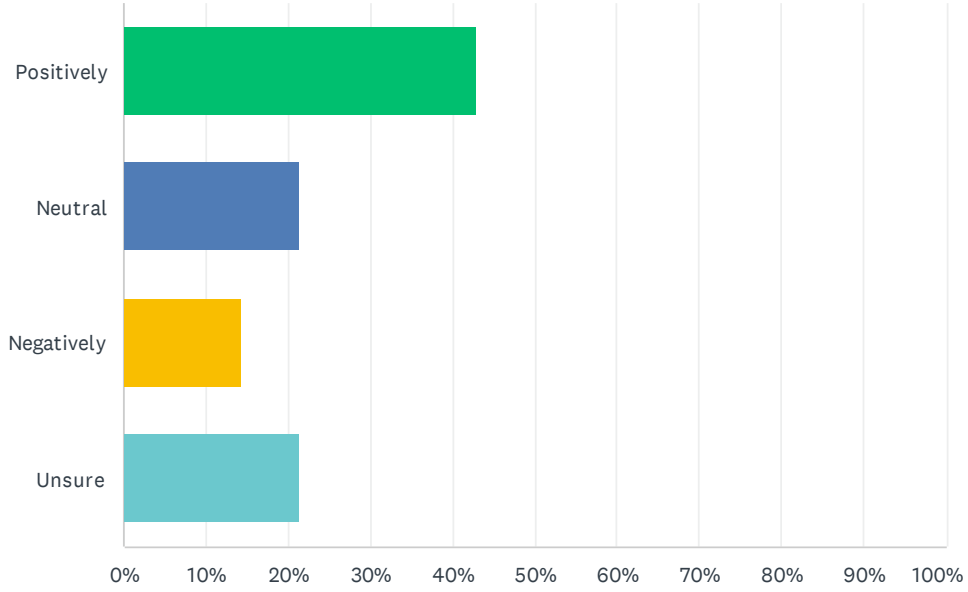


ANSWER CHOICES	RESPONSES	
Panic alarms	71.43%	10
CCTV (working with recording capacity)	42.86%	6
Mandatory information session as part of licensing	28.57%	4
Registration requirement for all staff (not licensed)	28.57%	4
Security guards	42.86%	6
None of the above	7.14%	1
Other (please specify)	28.57%	4
Total Respondents: 14		

#	OTHER (PLEASE SPECIFY)	DATE
1	No more licensing and I want decriminalization	9/30/2021 4:24 PM
2	Consult directly with those of us working in this businesses, with sex workers and the people who support us like SWWAC, about what we need like security on our own terms, no mandatory health tests but support around greater healthcare testing availability, labour protections while we work.	9/29/2021 12:37 PM
3	Require clients to provide ID	9/27/2021 1:09 PM
4	The City of Winnipeg should not be licensing our businesses in this way. Individual businesses can make their own choices as to what safety measures they put into place, just like any other business in Winnipeg.	9/27/2021 8:44 AM

Q10 If the City of Winnipeg no longer required licensing body rub parlours and escort agencies, how would this affect you?

Answered: 14 Skipped: 5



ANSWER CHOICES	RESPONSES	
Positively	42.86%	6
Neutral	21.43%	3
Negatively	14.29%	2
Unsure	21.43%	3
TOTAL		14

#	PLEASE EXPLAIN:	DATE
1	It would not personally affect me but it may impact participants that I work with. It could potentially put them in harms way if they go "underground" to operate since there would be absolutely no regulation or safety measures in place. It could also make it unclear whether they will be criminalized for participating in unlicensed body rub or escort agencies.	10/4/2021 9:36 AM
2	They should be like all other businesses and not require special licensing	9/30/2021 4:24 PM
3	I should not be required to pay for/deal with additional red tape or barriers to do my work, when most other business are not either.	9/29/2021 5:14 PM
4	The licensing is a barrier for entry for many people to earn an income in this way, and provides no benefits to the workers.	9/29/2021 5:13 PM
5	The City would be knowingly and actively pushing us into underground markets where we have to hide, work alone, and are more likely to experience violence, pressure, coercion. Please do not put us in this position! The industry is not going anywhere, it's just about how safe or unsafe you make it.	9/29/2021 12:37 PM
6	I would not have to fear that bylaw and or law enforcement might come into my space and ask to see my licenses and if I don't have one, I get the largest fine you have for all other businesses under this act, 500$!!! Right now, I fear that bylaw can come knocking at any time and ask for this information. Also, it creates more fear and stigma for us as sex workers,	9/27/2021 8:44 AM

	because we are regulated in this way, which is not how other businesss in Winnipeg get to operate, that are similar to ours, like therapists, or councillors, or hair dressers etc.	

Q11 If the City of Winnipeg no longer required licensing body rub parlours and escort agencies, how could the City improve the safety of workers?

Answered: 10 Skipped: 9

#	RESPONSES	DATE
1	The only way it could improve the safety of workers is if there are regulations and safety measures in place. providing security on site, CCTV in the common areas, keeping names of clients, banning problematic clients, not allowing drunk, high and violent clients on premise. etc..	10/4/2021 9:36 AM
2	Licensing is dangerous for sex workers, let general workplace health and safety rules and general worker protections apply. Eliminate all licensing fees for adult workers and fully decrim sex work in Winnipeg.	9/30/2021 4:24 PM
3	Implement full decriminalization of sex work, and create a culture in which clients feel comfortable providing screening information. If they don't fear arrest or prosecution, they have no reason to refuse to share such information for the provider's safety.	9/29/2021 5:14 PM
4	Educate law enforcement on how to handle assaults reported by workers in this industry so that if something goes wrong it is safe to come forward.	9/29/2021 5:13 PM
5	Continue to license massage parlour and escort agencies! Work *with* sex workers not against us. Meaningfully consult with us, take our direction because we know what’s best. Support harm reduction and the decriminalization of sex work.	9/29/2021 12:37 PM
6	Decriminalising and working to destigmatise adult-oriented business and employees	9/28/2021 12:21 PM
7	Considering the cost of said licenses who are they really helping??? A marginalized community needing to come up with 4000 a year to b a licensed escort because you need to obtain the business license as well as the personal license its unaffordable to a population of people already desperate...I sat make them free like the city of Edmonton... Is according to the law nobody's allowed to make money off of us so why is the government allowed to make money off of us and charge us for licenses and charge us for this and charge us for that but I can or that but I can't hire a security guard and I can't hire a driver to help me makes no sense	9/28/2021 10:14 AM
8	Work on a harm reduction basis. Decriminalize sexwork!	9/27/2021 1:31 PM
9	Decriminalize the purchase of sexual services	9/27/2021 1:09 PM
10	First of all, we should first be very clear that licensing doesnt keep us save. By laws do not keep marginalized folks safe. It is a way and measure of control, and it contributes to the views that sex workers aren't part of the community that they work or live in, and that they are harmful to communities. The city can take a stance on decriminalization like the Winnipeg Health authority has done and can leave us alone to do our business, a business that most of us are already doing without licenses anyway.	9/27/2021 8:44 AM

Q12 Do you have anything else you would like to add?

Answered: 9 Skipped: 10

#	RESPONSES	DATE
1	*** Redacted*** I think if licensing continues, then women should be allowed to dictate their owns prices for their services . The body rub parlour owner can charge a room fee from the attendant but no other fees should be allowed. We are considered self employed. They should not be able to put a price on our bodies or our time.	10/8/2021 12:32 PM
2	Licensing is dangerous for sex workers, let general workplace health and safety rules and general worker protections apply. Eliminate all licensing fees for adult workers and fully decrim sex work in Winnipeg.	9/30/2021 4:25 PM
3	I believe that decriminalization is the best way to make the industry safer and promote equality, as seen in New Zealand.	9/29/2021 5:19 PM
4	Eliminate all licensing fees for adult workers and fully decriminalize sex work within Winnipeg, full stop, the end.	9/29/2021 5:15 PM
5	Evidence, best practice and current research support the decriminalization of sex work towards helping us have stronger labour rights and labour protections. This is backed by Amnesty International, the World Health Organization, UNAIDS, the Global Alliance Against Traffic in Women and many others. Follow this lead!	9/29/2021 12:39 PM
6	No	9/28/2021 10:15 AM
7	Police should not be involved in the front line enforcement of any sex worker licensing policy. Find alternatives.	9/27/2021 1:11 PM
8	These bylaws and licensing were never about our safety. Clothing requirements for staff at parlours?? Requiring us to provide all the list of our clients and when we saw them?? Having to pay crazy high fines if we operate without a license. How do any of those measures help us? These are old by laws that should not be around any more especially in 2021, where we have mountains and mountains of evidence that speak to how bylaws hurt and harm workers.	9/27/2021 8:46 AM
9	***Redacted*** im in favour of licensing the businesses and workers. It prevents abuse and human trafficking. It keeps everyone registered and above board. The cost of the license however is strangely much higher than almost any other business license. I would like to see this cost brought down.	9/15/2021 12:52 PM