

Denial of Service - Sex Workers Rights are Human Rights

We recognize and honour the many great Nations upon whose lands we work, live, love and fight across the span of Turtle Island. We are deeply grateful to be guests in these lands, and we give this gratitude to the rightful guardians who have inhabited and stewarded these lands since time immemorial.

Hello everyone and thank you for taking the time to attend today's event and hear about 8 human rights complaints currently underway at the Canadian Human Rights Commission.

For those of you who do not know me my name is Susan Davis and I am a sex worker and the Executive Director of the BC Coalition of Experiential Communities.

Since 2002, the BC Coalition of Experiential Communities (BCCEC) are a democratic organization of sex workers representing diverse race, gender and genre in sex work across the BC Region. Our work focuses on law and policy reform being based on evidence and fact and on placing the voices of sex workers at the centre of all work that could impact our lives and safety.

I am 56 years old and from Halifax. I finished High school in 1986 and also completed the Royal Conservatory of Music in piano. I played french horn and flute and took part in girl guides and pathfinders. My parents are scientists and I had an amazing childhood. I did not experience any exploitation or abuse as a youth. I did not attend University.

I have worked in many jobs through the years but in 1986 I became an escort. I did out calls to hotels and clients homes and had a Madame who arranged my clients for me.

Since then I have been actively working in the sex industry as an independent escort with experience in many areas of the industry and as many sex industry workers do; I migrated across the sex industry and this country with the availability of work; I worked in micro brothels, businesses run from a residential space, escort agencies, massage parlours, adult film and on the street in Halifax, Monotonic, Montreal, Toronto, Surrey, New Westminster, Barnaby, and Vancouver; I spent time in prison, survived numerous assaults and several attempts on my life, battled cocaine and heroine addiction and survived 4 overdoses.

I have worked for the rights of our community since 2002 and have been privileged to witness successes and set backs throughout the decades. I would like to take time here to honour all of you and those who came before us for the hard work, blood, sweat, tears and sacrifices you made for us to have come this far. It may not feel like it but there have been changes. Some subtle, some more obvious...but change is change and we will get there....

On September 18, 2023 when the Canadian Alliance Charter case was dismissed by the Ontario Superior Court I was angry. We have worked collectively on decriminalizing our community for decades and the decision in this case was beyond disappointing, it was infuriating.

I felt desperate so I started trying to figure out how we could work to change the way our lives are viewed by the courts and government when they are making decisions which affect our lives. How

could we force them to adhere to the facts and take the rhetoric out of the equation....

Many sex workers across the globe are engaging with human rights processes and working to establish sex workers as human rights holders. I was inspired by that work and wondered if sex workers in Canada could do the same....

We have also recently discovered The Population Project research which has better defined the numbers of sex workers in Canada than ever before. There are a minimum of 169,000 people who have lived experience with sex work in Canada....the number is much higher than that but those were individual sex workers who were counted during the study.

So, I phoned the CHRC and had an emotional conversation with the intake person there..ehem.. in which I expressed the population project numbers and my frustration with the courts and government ignoring the lives, rights and safety of sex workers.

During that conversation I also demanded that they be honest with me about our chances and to "not waste my time"...

The young man on the phone was very polite and asked if I could hold so he could speak to his manager.....when he came back he confirmed that yes... sex workers are rights holders...and that they would be willing to discuss further a path forward...

From there I began to explore the CHRC website and complaint filing processes. I quickly realized that the human rights path for sex workers would be very narrow and that I would have to be creative and bend the interpretation of law to fit the issues our community is facing.

It was my hope that I would be able to work towards improving the day to day lives of sex workers by trying to address discrimination and stigma which has affected so many of us, including me, in so many ways as well as to build more evidence to support the Canadian Alliance efforts to bring down the laws.

Decriminalization is a critical feature of sex workers freedom in Canada which the Canadian Alliance are already working on and doing a great job!! So I was hoping to support that effort and to also try to begin to unravel some of the multitude of issues caused by criminalization and the stigma it perpetuates

After a series of back and forth emails, the CHRC set a date for meeting with me to further discuss hearing complaints from sex workers.

For context, the CHRC receive more than 46,000 complaint inquiries a year and only about 460 are accepted to go forward.

In that meeting I went down the list of all the ways I could think of in which sex workers human rights were being violated in Canada. The Department of Justice, Members of Parliament and Judges all ignoring and dismissing our experiences, police refusing to reform their approaches to sex worker safety, health care structures exclusion of sex workers, discrimination in housing, discrimination in

child apprehension, discrimination against children who were the victims of crime, Financial exclusion, Internet exclusion, Municipalities discriminating against us and writing our exclusion into all planning and development spaces, Parliamentary clerks denying sex workers service by not doing their jobs and vetting "evidence" presented in committee for ethics when decisions were being made about our lives....

At the end of the meeting I provided the CHRC with my speaking notes and they agreed to investigate where they thought I might have the most success in settling complaints about denial of sex workers human rights in Canada.

They came back to me with a list of 8 complaints they felt would have the greatest chances of success.

These were Health Canada - one complaint, the RCMP - 2 complaints and FINTRAC and 4 of the major banks - 5 complaints.

All of the complaints are based on something called denial of service which I will explain in more detail as we go along.

So, this is how I came to file the 8 complaints I would like to discuss today.

I have been working on these cases for a year and half at this point and I have to say, it has been difficult. The language in this sphere is terrible and degrading. I have been forced to find a path forward which was not ideal and felt uncomfortable to me. I tried to be careful with language and to be as inclusive as possible but as you will hear later, it was not always possible to describe our community in the ways we have become accustomed to.

So please, try to understand as we go through that the language I used and the path I took to bring these complaints forward may be difficult for some people here. It is difficult for me too and I hope in the future we will be able to take part in modernizing the CHRC process to be more inclusive and accessible going forward.

I want to also say and be clear...this work has not changed anything....yet...as it stands we are not done and these cases are not resolved. I just want to be sure people don't misunderstand.

I also want to say that I know this will be a long meeting so we will take some breaks.

It is totally fine if people cannot stay for the whole meeting and I will answer questions as we go. There will be time for questions in each section and I will do my best to answer everyone's concerns.

I would like to start with a brief look at the Canadian Human Rights Act.

1. Purpose and Principles

The Canadian Human Rights Act was enacted to ensure that individuals under federal jurisdiction are treated equally and not subjected to discrimination. It represents Canada's commitment to **equality, fairness, and human dignity**.

Its core principle is:

"All individuals should have an equal opportunity to make for themselves the lives that they are able and wish to have."

So, this not the criminal code but it is a law in Canada so violations of human rights are illegal. The criminal code purpose is to "punish crime" where as the human rights code purpose is to prevent discrimination.

The criminal code is enforced by police, prosecutors and the criminal courts, the human rights act is enforced through complaints to the Canadian Human Rights Commission who investigate and in some cases are heard by the Canadian Human Rights Tribunal.

Settlements and decisions made through the Canadian Human Rights Commission are binding, the decisions must be followed. So they have the same kind of power to render justice as the courts do.

I have a quote i used in the cases from Dickson, supra at paragraph 45 - (the Charter) "must be interpreted in a manner that is flexible, purposive, and generous, rather than technical, narrow, or legalistic"

This is a great description of the difference between the criminal code and the Canadian Human Rights Act the Canadian Human Rights Commission and Tribunal are to bend towards justice and not be bound by the letter of the law.

2. Who is accountable under the CHRA?

The CHRA applies **only to federally regulated employers and service providers**, such as:

- **Federal government departments and agencies**
- **Banks**
- **Telecommunications companies (e.g., Bell, Rogers)**
- **Airlines (e.g., Air Canada)**
- **Railways and other interprovincial transportation**
- **Canada Post**
- **First Nations governments and organizations**

For businesses or organizations regulated by provincial or territorial governments, **provincial human rights codes** apply instead. Each Province and Territory have their own human rights act, commission and tribunal.

So complaints against Provincial Housing Authorities for example or Provincial Health Authorities would require a complaint to the Provincial Human Rights Commission.

They are very similar however so the basic process remains the same.

The CHRA defines a **discriminatory practice** as any action, policy, or rule that:

"results in a distinction, exclusion or preference based on a prohibited ground that **nullifies or impairs** a person's right to full and equal recognition and exercise of their human rights and freedoms."

This includes both **intentional acts** (direct discrimination) and **unintentional consequences** (indirect or systemic discrimination).

So, this is not as cut and dry as it sounds, I would say that much of the discrimination experienced by sex workers is intentional or direct discrimination however I would also say discrimination against sex workers is systemic. It is across the entirety of society and embedded in policy, practice and law.

An individual sex worker experiences incidents of discrimination for which they can make a complaint to a Human Rights Commission. Policy, practice and laws which single out sex workers for discrimination, denial of service or exclusion as a distinct group is systemic so requires a less direct approach in which sex workers broadly and as a community are represented based on multiple complaints.

I chose to bring these complaints forward based on broad policy. practice and laws which name sex workers explicitly for discrimination or blatantly exclude sex workers completely.

This is a more difficult path. If a complaint is based on a specific incident which happened to an individual at a specific time and place the complaint process is much simpler and very direct.

When a complaint is about long term, ongoing, still happening in the present discrimination, the tools for filing the complaints become muddy and you have to work a bit to fit into the options the process offers instead of finding a clear path to bringing a complaint.

I knew when I started thinking about these cases that we would immediately have a problem finding which status would sex workers be protected under. We all know that sex work crosses all genders and many genres and locations as well. Our community is very diverse and many of us identify with intersecting grounds for discrimination.

3. Prohibited Grounds of Discrimination

It is illegal under the CHRA to discriminate based on any of the following:

- Race
- National or ethnic origin
- Colour
- Religion
- Age
- Sex
- Sexual orientation
- Gender identity or expression

- Marital status
- Family status
- Disability (physical or mental)
- Genetic characteristics
- Conviction for which a pardon or record suspension has been granted

are there any questions about this? or other aspects of the CHRA?

To file a complaint with the CHRC you have to file your complaint either in writing which takes a long time or through an online portal. The portal asks questions about your complaint and will not progress on the form without answers to each question being complete.

The form asks for "protected grounds" and offers the list we see here.

The population project numbers included gender of sex workers.

Now, this research was conducted using sex work advertising platforms used primarily by women who do sex work. This is why I say a minimum of 169,000 people with lived experience in sex work exist in Canada. Advertising platforms used primarily by queer and gender diverse sex workers were not included so their numbers as a population are not truly represented in the data. There is also race and age based data and other research which reveals data about sex workers and disabilities....

I settled on "sex" to be the protected grounds I filed under as 83.5% of sex workers in the Population Project data were women. I referenced "women who do sex work" in the complaints and all of my submissions from that point onward.

In the original complaints I did note as part of it that the sex worker community are very diverse and that our identities intersect many protected grounds.

4. Where Discrimination Is Prohibited

The Act prohibits discrimination in very specific and narrow ways:

- **Employment** (e.g., hiring, promotions, wages, termination)
- **Provision of goods, services, facilities, or accommodation** (e.g., banking services, air travel, phone services)

Provision of goods, services, facilities or accommodation is where systemic discrimination against sex workers occurs and this was the foundation of the complaints. Denial of service by government, banks and police against a large population of easily identifiable women, women who do sex work.

5. Duty to Accommodate

Employers and service providers have a **legal obligation to accommodate** individuals who need it (e.g., due to disability, religion) up to the point of **undue hardship**. This might mean changing

schedules, modifying workspaces, or allowing flexible policies.

Duty to accommodate and Employment were not a part of the complaints I filed so I did not dive into them very much but this could be a place for future complaints about work place safety, sick days, accessibility for disabled sex workers and more.

In the next part of my presentation it is important to know that when you file a complaint, you become the Complainant and the person, business or organization you are complaining about become the Respondent. I am sharing this as it can get a bit confusing in the back and forth about it

The Complaint Process has 4 main components to resolving a complaint;

The process generally includes:

1. **Filing the complaint** (must be within one year of the incident) When you file the complaint it is first examined by CHRC intake staff and it is determined whether it will go forward. If it is chosen to go forward the Respondents are then notified. After They are notified of the complaint they are given 60 days to reply. Once the Complainant, in these cases me, has received their reply, the complainant may respond to that reply....which I did for every case.

The time line of 1 year is important and was raised by every Respondent stating that it was likely my complaints were "out of time". It is most important for individual sex workers who are filing a complaint about discrimination to note and record the time, date, location etc as they are all important in individual cases and must be filed within a year. Knowing the key dates can be the difference between having a complaint heard or not at the CHRC.

For these cases I argued that as the discrimination was ongoing and the policy and practices were still in place so the complaints are NOT out of time.

It kind of seems to be a legal tactic to say the complaint is out of time. Each complaint is being managed by different lawyers representing the different Respondents yet all of them claimed "out of time" as a reason for the CHRC to not hear the complaint.

Another issue raised by every Respondent is that "sex worker is not a protected status under the CHRA. This is where I chose the protected grounds of "sex". Women who do sex work are still women and as such we are rights holders. This could just as easily be LGBTQ2SI sex workers as that is also a protected status. Since the data from the population project mainly revealed numbers of women who do sex work for the reasons I stated before, I focused in on that.

I argued that the "good vs bad women" discrimination is as old as written history and a large group of easily identifiable women are rights holders who are protected under the CHRA.

Respondents were also looking for an "individual" complainant whose experiences they could examine and were challenged by the idea of sex workers as a community. Respondents argued that I did not have "sex workers permission" to bring the complaints. I did have permission however and have had the support of BCCC Members all the way through this process.

I also named stigma and discrimination and the violence it causes as a barrier for individual sex workers to bring complaints.

At one bank they stated - The Complainant asserts in her Complaint, that "I WAS DENIED A SERVICE", with "Bank Management" involved, because she is a "woman and a sex worker". This is not true.

to which i replied -

The Claimant states she is a woman and a sex worker, this is true.

Women who do sex work are being denied a service and face discrimination. This is true

The Claimant states that the discrimination and denial of service occurred with Bank Management involved. This is true.

(bank) state openly that Bank Management are in charge of all policy development and decisions; for example "Our Human Rights Position Statement ("Statement") is a representation of our commitment to respect human rights and was approved by (bank) Group Executive and reviewed by the Governance Committee of the (bank) Board of Directors. " This demonstrates (bank) Practice across all policies, practices, training and methods - (bank) Executive, (bank) Risk Management Committee and the Governance Committee all reviewed, approved and directed implementation.

The respondent claims no "specific individuals" allegedly affected were named. The complaints received from sex workers are confidential and held by the complainant for use in efforts to resolve this denial of service and the discrimination being experienced by women who do sex work and non sex working women with out placing their safety at risk.

The stigma women who do sex work experience is well documented.

The violence caused by that stigma is well documented.

The risk of discrimination against individual women who do sex work and who are being denied service is predictable and tangible and as such no specifics or identifying information about any sex worker who made a complaint will be shared.

I provided documents, copies of research, their own policy statements as attachments to the response, they want documentation so i gave them some, i say some because if any of these cases go all the way through to be heard by the tribunal, i will include a lot more.

I believe this argument can be used for complaints about systemic discrimination against sex workers in other cases as well. This could provide a way for broad based complaints to go forward without risking the safety of any individual sex workers.

Those arguments existed across all of the cases. I could go into more detail but will leave it there and get into each of the individual complaints. If people are interested I am happy to share the full arguments from both sides so you can have a more detailed look at them.

does anyone have any questions about this argument? or what I used as the defence against it?

GBA Plus Program

I refer to the GBA Plus Program throughout all of these complaints. This is the Gender Based Analysis Plus program which all federal departments are mandated to engage when developing policy, practice and law.

The GBA Plus Program requires all federal employees and departments to centre the voices of those most affected by any work they are doing;

This is from the Government of Canada website;

***Gender-based Analysis Plus (GBA Plus)** is an analytical tool used to support the development of responsive and inclusive policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue or opportunity being addressed by the initiative; identifying how the initiative could be tailored to meet diverse needs of the people most impacted; and anticipating and mitigating any barriers to accessing or benefiting from the initiative. GBA Plus is an intersectional analysis that goes beyond biological (sex) and socio-cultural (gender) differences to consider other factors, such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion, and sexual orientation.*

Using GBA Plus involves taking a gender- and diversity-sensitive approach to our work. Considering all intersecting identity factors as part of GBA Plus, not only sex and gender, is a Government of Canada commitment.

This program asks federal employees specifically if their own biases maybe shaping their approaches. The biases about who sex workers are exist across all of society due largely to our continued criminalization and that the loudest voices discussing sex work are those who wish to abolish it.

GBA Plus should place sex workers at the centre of any discussions or actions which could impact our lives but it has not. I have yet to see any policy or action which considered impacts on sex workers even in spaces where it should be obvious that there are risks to our community. for example - work to fight sex trafficking - never considers the vast majority of sex workers who work by choice and do not work for someone else. Instead, bias and discrimination about who sex workers are - that we are all exploited - have dominated every law, policy and action taken. They never adhered to the Government mandated GBA Plus program and sex workers were never consulted in a meaningful way.

This violates their own rules and is discrimination, it is denial of service. By excluding us and ignoring the policy, they have denied sex workers the service of inclusion under the GBA Plus Program.

are there any questions about why this mandated program is important?

Okay, now I will share each complaint individually - there are really only 4 complaints as the FINTRAC and Banks are all based on the same denial of service so those 5 complaints are all very similar.

Let's start with FINTRAC and the banks.

I stated that FINTRAC and the banks were denying women who do sex work a service. I kept the initial complaints to a minimum with just the basics included in this initial step. It was my hope that the respondents would reply and reveal their arguments which I could then respond to and include much more detailed information. It worked and I was able to use their responses to the complaint to outline my replies.

They all of course claimed they did nothing and I was wrong and then referenced other cases which really had no link what so ever to the complaints I was making.

Just to be clear, in this next section "reporting entities" are the banks

I answered them on a point by point basis as is the format for these submissions.

- 1. FINTRAC claim no contract, no guidance and no information were offered to reporting entities. FINTRAC exercise elevated credibility and political capital created by their status as government representatives and experts and have placed reporting entities in a position of being "controlled". Reporting entities must adopt FINTRAC guidance, best practices advice and recommendations as policy or be seen as "non-compliant" and complacent in sex trafficking.*
- 2. FINTRAC are responsible for providing bias and injurious training about sex workers (sex trafficking) to Banks which has lead to denial of service to women who do sex work during their mandated activities to raise public awareness*
- 3. FINTRAC are empowered to impose fines and penalties on reporting entities who are non-compliant.*
- 4. FINTRAC are directly responsible for advising Banks to adopt policies and practices based on FINTRAC's expert advice and elevated credibility. The total exclusion of sex workers in development of the "Project Protect" , "FAST" , "Indicators of Trafficking" and FINTRAC's failure to investigate whether there are any negative outcomes caused by their work is denial of service and has had tangible impacts on sex workers across Canada.*
- 5. FINTRAC's guidance and advice to reporting entities is taken seriously by those entities. FINTRAC's advice to reporting entities is taken as legitimate, a best practice and adopted as outlined by FINTRAC.*
- 6. FINTRAC is named specifically as the source of the policies in bank policy statements.*
- 7. FINTRAC's mandate includes the following responsibility which FINTRAC reference in multiple places within it's response;*

"Enhancing public awareness and understanding of money laundering and terrorist activity financing."
- 11. No where in any reviewed materials about the public private partnerships, best practices or compliance does FINTRAC endeavour to distinguish between sex trafficking and sex work nor does FINTRAC make any references to determining whether a transaction is a legitimate sex work transaction or the proceeds of sex trafficking in their educational materials and best practices guidance.*
- 12. No where on the FINTRAC website are sex workers mentioned. There is no indication that FINTRAC have ever considered or supported sex worker financial inclusion or sex workers. FINTRAC have instead have focused entirely on prevention and deterring of sex trafficking.*
- 13. Sex trafficking survivors and sex workers have completely different experiences. Sex trafficking survivors are the victims of crime, sex workers are not. The vast majority of women who do sex work in Canada do not work full time and do not work for someone else. The vast*

majority of sex workers are not sex trafficking victims.

14. Using the links provided by FINTRAC to STATSCAN data on the numbers of sex trafficking victims in Canada, this serious crime impacts 0.3% of sex workers. 99.7% of sex workers are vulnerable to being impacted by the guidance and best practices promoted by FINTRAC.

15. FINTRAC goes into detail on their website about the conferences, international, national, provincial and localized group training and information sessions and the broad groups of both public and private organizations who have received their training and guidelines for best practices identifying and deterring sex trafficking.

16. Assertions that FINTRAC do not provide any guidance, instruction or other information to banks and other public and private sector reporting entities is disproven by FINTRAC's own information provided in response to this claim.

17. Assertions of employing a GBA Plus approach are a misrepresentation as again, sex workers are not mentioned anywhere on the FINTRAC web site, its action plans nor in the FAST Program or Project Protect objectives and information. Sex workers have never been included or consulted about how FINTRAC's public awareness activities and best practices guidance are harming sex workers via this resulting denial of service.

18. FINTRAC have never posed the "key questions" which are fundamental to the GBA Plus Analysis to sex workers. Again, sex trafficking survivors are not sex workers and the resulting negative consequences, financial exclusion and denial of service, are caused by FINTRAC's conflation of the 2 groups.

19. FINTRAC's failure to recognize its own biases in this regard and continued efforts in training public and private reporting entities using materials created based on this bias have caused widespread harm to the sex working community and our ability to access basic financial business tools.

20. FINTRAC have denied sex workers service to which they are entitled via inclusion under GBA Plus Analysis. FINTRAC's failure to recognize the obvious risk to consensual sex workers lives and safety is a reflection of FINTRAC's lack of understanding the principles contained in the GBA Plus Analysis program.

21. The FINTRAC "Operational Alert – Updated indicators : Laundering Proceeds of Human Trafficking for sexual exploitation" document is a prime example of this bias in action. The document is full of conflation of sex work and human trafficking and the "indicators" are so broad they could apply to any sex worker.

22. FINTRAC guidance and "indicators" capture the activities of sex worker collectives, escort agencies, massage parlours and names all manner of safe sex work spaces. It identifies "apartments", sex workers homes, where the majority of sex workers work, as human trafficking locations.

23. FINTRAC name "e-transfers" as an "indicator". All sex workers use e-transfer to pay for ads, accept payment for their work, to collect deposits on appointments and to pay their bills. It mentions "pre-paid credit cards" as an indicator. This is a reflection of the lack of consultation with sex workers many of whom do not have credit and rely on pre-paid options to be able to function in a more and more cashless society.

24. The impact of this targeting of sex workers wages and the ways sex workers do business demonstrates that FINTRAC did not, at any point, consider the effects of their work on sex workers lives and safety nor did FINTRAC consult sex workers as part of the GBA Plus Analysis.

27. FINTRAC have denied service to sex workers via exclusion from development of educational materials, guidance information and indicators used by reporting entities which any person could reasonably understand to be dangerous and discriminatory for sex workers.

28. FINTRAC have promoted denial of service to sex workers among reporting entities as a best practice.

30. Sex work is decriminalized in Canada, it is not a criminal activity. Inclusion of sex work beside Terrorist Financing and Money Laundering casts sex work as a criminal activity and separates sex workers as undeserving of fair treatment by financial institutions and reporting entities.

31. As sex work is a legal source of income, Sex Workers are entitled to access the same financial tools as other citizens and to be paid for their work free from over surveillance, discrimination and fear of loss of their wages.

Assertions that sex work is decriminalized under the Canadian Criminal Code provisions and that sex workers are free to engage in public life on the same level as other citizens is not widely known or understood. The stigma and bias which permeates every corner of policy and law is tangible and persistent. In one context the Government of Canada says that women who do sex work are decriminalized under the criminal code but in another context will say women who do sex work are criminals and their earnings are the proceeds of crime.

The responses to these complaints stated that sex workers who are a vast majority women do not qualify for human rights, are not worthy of consideration, are liars, do not deserve protection and that our lives and safety have no value that would justify spending any resources on hearing this complaint. One respondent literally wrote that the CHRC should not waste its limited resources investigating this complaint...meaning they shouldn't waste their money...

Even since the filing of this complaint FINTRAC, in May of 2024 have released a sectoral and geographic advisory to encourage surveillance of transactions at automated crypto exchange machines for the indicators of sex trafficking, money laundering and terrorist financing.

This action has prompted a change in service on the part of the companies which run the machines to block the main escort advertising website QR Code. So now, sex workers cannot use the lowest barrier method of paying for ads on-line to work from home for themselves...the safest sex work approach

there is....

What should these sex workers do? What will happen to them? Poverty has not evaporated. For those who do not understand the complex processes associated with crypto purchase, wallets and the rest.... how should they meet clients? Back to the street corner and into the hands of predators...

This action clearly never considered impacts on women who do sex work nor the safety of those women who would be forced to take risks in order to feed and house themselves and their families.

This most recent action demonstrates the impact of the lack of GBA Plus program understanding and a failure on the part of those organizations who promote the idea of all sex work as exploitation.

Any consultation which did happen is clearly happening with those people who wish to abolish sex work completely. The idea that all sex work is exploitation is not an internationally accepted norm. In Canada the review of the current legal framework in the Parliamentary Justice Committee once again showed that the facts about these issues are being skewed and that the Government of Canada are doing a terrible job at living up to their commitments to the decriminalization of women who do sex work.

FINTRAC assert in their response to this complaint that they did consult active sex workers during development of it's policies, tools and actions. I challenge this assertion. What sex workers were consulted?

The exclusion of those groups and individuals who are the sex worker communities self identified leaders is in direct conflict with the principles set out in the GBAPlus program. We are easy to find. We're in the news in an ongoing way and available for consultation when people reach out to us. No where on the FINTRAC website or in their action statements and other materials are sex workers mentioned so again, who did FINTRAC consult? NO sex worker group I know has ever been contacted by FINTRAC for the purpose of consultation.

All of the reporting entities state on their own websites that they are actively working to prevent the kind of issues my complaint is based on. No where in any of the reporting entities policies, practices and training were women who do sex work mentioned.

Reporting entities also have an obligation to understand the impact of any policies, training or practices on protected groups and should have understood that the prohibition of or enhanced due diligence against adult or red light businesses would impact someone.

I told them that while I understand people have good intentions in creating these programs, we all want to end exploitation in the sex industry....***intentions do not determine discrimination, the impacts determine discrimination.***

So, this complaint went to "mediation" after I had filed my response to the banks and FINTRAC replies. During mediation all sides are given an opportunity to speak with the intention of reaching a settlement without having to appear before the Tribunal.

I detailed some of the individual complaints I received and defended my "standing" or right to represent women who do sex work as a community. At the end I asked that FINTRAC and all of the reporting entities (banks) contribute the maximum allowable - \$20,000.00 for a total of \$100,000.00 and work with us to engage in a meaningful consultation with women who do sex work about financial exclusion with the goal of ending the discriminatory policies and practices which are causing ongoing and escalating harm.

All of the respondents refused my offer instead stating they would challenge sex workers standing as rights holders in front of the CHRT instead.

This was the first mediation I took part in and upon reflection there were things I could have done better. I should never have asked for money. I asked them to contribute to a sex worker run consultation. Instead I should have asked them for meaningful consultation and asked FINTRAC to run it under their own budget. When I asked them for actual money, they all shut down... I committed at this point to do things differently in the next consultation which was with health canada....

I know this is a lot of information... does anyone have any questions about the Financial exclusion complaints?

Health Canada

In 2021 I had attended a meeting in India via zoom with the All India Network of Sex Workers in the spirit of collaboration and my ongoing admiration of the work being done there. UNAIDS were in attendance and were funding the AINSW to meet twice a year with sex worker representatives from 52 different provinces.

I wondered, where is UNAIDS funding going in Canada? why are sex workers not being funded for community development in Canada like they are in other places?

This lead me to begin to look for organizations or projects which were sex worker focused and sex workers run and funded the HIV prevention streams....there are none....now that the AESHA Project is shut down and the sex workers clinic also shut down...there is nothing in Canada which is funded through the HIV funding streams and is specific to women who do sex work

At the time sex workers were only mentioned as a foot note in the National 5 year accelerated action plan to combat HIV and other STBBI...we were not mentioned except in passing or as etc. or...and others...sex workers are named as a priority population in the revised action plan now but there are no proposed actions or goals which are specific to sex workers. Other priority groups are named for specific actions but not us....

The came the National Women's Health Research Initiative call for proposals which stated a focus on marginalized communities of women should be a priority. The call for submissions included a detailed and exhaustive list of types of women to be included and at the end... and others. sex workers were not mentioned.

I met with the deputy minister of health and representatives from Women and Gender Equity and

expressed my concerns about not naming sex workers. I expressed that if sex workers were not named, we would not be a priority for funding.

They agreed to change the call for proposals and said it was an "omission" and was not purposeful.

When I checked on the call for proposals later, they had changed it but still had not included sex workers. They instead wrote, experiencing criminalization...

Now, the outcomes of that call for proposals are coming to fruition. Not one project was centred on sex workers health, not one of the programs even mention sex workers. I called out the Women Centered HIV care Hub about this exclusion and we had a meeting with them just last week...

This issue continues to hamper sex workers efforts to organize and build community and was the reason I filed this complaint. The more I looked into it the more disturbed I became about the exclusion of sex workers from across health structures and under the health portfolio partners work.

Health Canada also stated that sex workers do not qualify for human rights and said a lot of other things one would not expect from a health related government body.

Here is some of my replies to their response to the claim....

The Respondent claims that they "Health Canada" do not provide a service to Canadians. That no services are offered and that as such women who do sex work have not been denied a service or experienced discrimination by Health Canada.

The discriminatory practice of exclusion of women who do sex work from services mandated to Health Canada is not frivolous nor is it vexatious and is plain for anyone to see.

frivolous and vexatious means it is a waste of time is harmful to the respondent - health canada

The respondent notes in their response that 77% of sex workers identify as women which highlights the over representation of women in sex work as, again by Health Canada's own response, only 50.9% of Canadians are women.

Women who do sex work are being denied a service and are subject to discriminatory practice by Health Canada.

Health Canada states it's raison d'etre as; Health Canada upholds the public health care system, expands access to health services, helps to reduce health risks, and supports Canadians in making informed health decisions.

Health Canada have not acted to reduce health risks nor have they supported Canadians in making informed decisions about sex work. Health Canada have done nothing to ensure women who do sex work have accurate information about their health nor to reduce health

risks to women who do sex work.

Health Canada state their mission is to help Canadians maintain and improve their health. As a regulator, service provider, promoter of innovation, and trusted source of information, the Department is a key partner in health for all Canadians

*Health Canada also state; As a partner in health, Health Canada supports activities that:
Uphold and protect the publicly funded health care system*

- *Promote innovation in health care*
- *Expand access to oral health care to eligible Canadian residents*
- *Protect Canadians from unsafe food, health and consumer products*
- ***Inform Canadians so they can make healthy choices*** - *Health Canada have made no effort to inform Canadians about healthy choices in sex work or how the broader population can contribute to sex workers health and safety by working to break the stigma against sex workers, in this case the majority of sex workers, who are women.*

Health Canada provide services to Canadians by working to address;

- *Environmental and workplace health - Health effects of environmental and workplace factors including air, noise, soil and water pollution.*

Violence against sex workers is a workplace health effect created by the environment of criminalization. Where has Health Canada ever fulfilled it's mandate to address this work place health impact?

- *Health Care System - Our health care system, including commissions and inquiries, eHealth, pharmaceuticals, legislation and guidelines.*

Health Canada explicitly state they are involved in creation of legislation and guidelines and consider this an important service or area of their work. Health Canada also claim that they cannot consult or inform legislation governing sex work. This contradiction is at the heart of the complaint.

- *Health Concerns - Preventing health problems by educating the public on drugs, diseases and more.*

Health Canada have never drawn on any of the research funded under the Health Portfolio to understand their role in educating the public on sex workers health and inclusion. The only way to end stigma is to bring awareness to the public about prevention of violence, disease and death of sex workers through inclusion. Health Canada have denied sex workers and Canadians the service of education about these issues and in turn increased the risk to women who do sex work through their inaction.

Health Science and Research - Helping you make informed decisions about health through

science, research and testing.

The Respondent has cited numerous research projects about the harms sex workers experience due to lack of action by those responsible, like Health Canada yet Health Canada have never acted on any of the recommendations of that research even though it is clearly part of their mandate to do so.

Public education as noted previously is part of Health Canada's mandate.

Health Canada Legal Services Department state explicitly that The Legal Services Unit provides legal services to the Department of Health and the Public Health Agency. These include legal policy advice, opinions, development of legislative proposals, litigation support and assistance to the Minister, Deputy Minister and to senior managers as well as to working level managers and officers.

At anytime, Health Canada could have fulfilled their mandate and employed their legal services department to provide services in regard to sex workers and based on Health Science and Research which was funded and received by their department. Health Canada could have developed legislation in line with their own research findings and submitted them to Ministers, Deputy Ministers and to senior managers as outlined previously.

Health Canada state "they must be invited to appear as witnesses before committee" in Parliament or the Senate. This is incorrect.

Any person may submit a brief for consideration by committee in particular as it relates to development of legislation. I myself have submitted numerous briefs including to Bill M-47 and to Bill C-36. Health Canada could have at anytime fulfilled it's mandate and submitted a brief to committees studying punitive laws against sex work. There is no rule which prevents relevant departments from weighing in on important issues as is proven by the appearance and brief of the Privacy Commissioner in the study of Bill C-14.

Health Canada name research projects and other work to support people who use drugs as justification for their lack of action or proof of some kind of action in protecting sex workers health.

There is no reason to believe that the majority of sex workers are drug users. This is a reflection of bias and discrimination and a tired old stereo type about who sex workers are.

Work to address addiction and mental health issues are not specific to sex workers and as such do not qualify as Health Canada providing a mandated service to women who do sex work. Work to support trans and LGBTQ2 communities and drug users does not equal work to prioritize sex workers health.

Health Canada reference The Sexual and Reproductive Health Fund who listed sex-workers as key under-served population in the context of the second and third calls for proposals, which launched in July 2022 and May 2024 respectively and state that following the second call for

proposals, the Program funded The CART Access project: Advancing access to abortion for under-served populations through tools for healthcare professionals and people seeking care. includes "people experiencing criminalization" and "people with experience of incarceration." Though it does not specifically name sex workers in its priority populations, their work is stated to be inclusive of sex workers due to the intersection with criminalization.

This is a prime example of claiming to be working for sex workers health yet not naming sex workers and it not being a sex worker specific action. Sex workers need specialized services and clear policies around confidentiality and the non-discriminatory treatment expected.

Not to mention, the majority of sex workers have never been in prison. The majority do not work for someone else and do not work full time.

This not to say the CART Program is not important, it sounds amazing. It is not however a program or action for sex workers.

Any action or work to finally meet the health needs of women who do sex work must centre their experiences and be under their direction from inception to realization. As per the Tri Council Policy Statement and as an over researched community, we demand Health Canada and it's partners under the Health Portfolio adhere to their own rules. The time for research is moving on, the time for action is now. If sex workers are to be named a "priority population" in action plans or funding opportunities, we must be included, named and truly prioritized.

Appropriate Inclusion is not one working group meeting with 12 people as was stated had happened. Appropriate inclusion must be broad based and reflect the diversity of women who do sex work.

It begs the question, Did representatives of Health Canada actually read the submissions they referenced from sex workers organizations? These submissions were made the PHAC in development of the HIV/STBBI Action Plan and certainly would be relevant to Health Canada if they were to provide the service sex workers are being denied in improving environmental and workplace health, addressing health concerns and working to inform legislation....

I note that not one program or action supported by the sexual and reproductive health fund was sex worker specific and there is no way to determine whether Health Canada's bald assertion that these programs support sex workers by default is true.

The majority other programs cited by Health Canada were related to substance use. The majority of sex workers are not drugs users and once again there is no way to determine whether Health Canada's bald assertion of sex workers receiving support by default is true.

Health Canada have failed to fulfill their mandate to provide services to women who do sex work via public education, development of legislation, development of actions and improving workplace environmental risks and have stated as much in their response.

Health Canada make excuses for why they refuse to include and name sex workers stating sex

workers are implied when other intersections which impact health are discussed.

This is discrimination as defined in all of research, guidelines and information on the issue of stigma endured by sex workers and the impact of that stigma. Naming sex workers and including us in any development of policy, practice or legislation is critical in ending the barriers sex workers, in particular women who do sex work, face in protecting their health.

Not naming women who do sex work is discrimination and is in itself denial of service.

In 2016, the UN working group on the issue of discrimination against women in law and in practice ("the UN Working Group"), noted that criminalisation of women in sex work "places them in a situation of injustice, vulnerability and stigma and is contrary to international human rights law." It underscored that the enforcement of punitive provisions to regulate women's control over their own bodies, such as those governing sex work, is a severe and unjustified form of state control and infringes women's dignity and bodily integrity by restricting their autonomy to make decisions about their own lives and health.

The Council of Europe/s Commissioner on Human Rights notes in his comments from Strasbourg on Feb 15, 2024;

Sex workers suffer from the persistent stigma of sex work as shameful and dishonourable. The ensuing high level of socially accepted disrespect, intimidation and discrimination on the basis of their perceived failure to conform to social and gender-based norms of sexual behaviour is obstructive to their efforts to lead self-determined lives. Stigmatization often leads to sex workers hiding their involvement in sex work and living under constant fear of being outed and exposed to public shaming for themselves and their families. It also prevents them from obtaining adequate health services and can influence their access to housing, education, or childcare.

From the UNAIDS - Global AIDS Strategy 2021-2026 — End Inequalities. End AIDS.

The Strategy builds on an extensive review of the available evidence and a broad-based, inclusive, consultative process in which over 10 000 stakeholders from 160 countries participated.

The risk of acquiring HIV is 26 times higher among gay men and other men who have sex with men, 29 times higher among people who inject drugs, 30 times higher for sex workers, and 13 times higher for transgender people.A central reason why disparities in the HIV response remain so stark and persistent is that we have not successfully addressed the societal and structural factors that increase HIV vulnerability and diminish people's abilities to access and effectively benefit from HIV services. Recognizing the equal worth and dignity of every person is not only ethical, it is critical for ending AIDS. Equal access to HIV services and the full protection of human rights must be realized for all people.

In spite of sex workers being at a 30 times higher risk of contracting HIV, No member or department under the Health Portfolio have moved to action for sex workers or our risk.

Health Canada's representatives claim that it would be too much work to list all the groups affected or to be included in a particular action or priority under the Health Portfolio but DO create exhaustive lists of priority populations which explicitly only exclude sex workers. This exclusion is discrimination in particular where every other priority group are named but us.

The Complainant states that this complaint meets the requirements of all three section of the CHRA noted by Health Canada-

(1) they have a characteristic protected from discrimination under the CHRA;

The vast majority of sex workers - a minimum of 169,000 people in Canada are sex workers - 140,000 of them are women according to published and peer reviewed research. Women who do sex work are widely recognized as rights holders globally.

(2) they experienced an adverse impact with respect to the service;

The "good vs bad" women stigma is as old as written history. Health Canada has access to multiple research papers detailing this discrimination and it's impact on sex workers including barriers to health, bodily autonomy and justice. Health Canada should reasonably understand and have knowledge of the research developed under it's partners in the Health Portfolio as per it's mandate. Health Canada should reasonably understand the adverse impacts detailed in that research.

Health Canada did not think about sex workers, did not endeavour to discover whether sex workers were appropriately included, did not recognize it's role in discrimination against sex workers and does not recognize the adverse impacts it is causing with it's inaction.

(3) the protected characteristic was a factor in the adverse impact.

Women who do sex work and who have been excluded from service and consideration by Health Canada in it's actions and programs in particular public education and legislative development experience the detailed adverse impacts as outlined in research supported and conducted under the Health Portfolio Partners

Health Canada has a mandate to deliver services under Environmental and workplace health, Health Concerns and the Healthcare System and has failed to do so. As such. Health Canada has denied women who do sex work a service and discriminated against a large group of easily identifiable women who are rights holders in Canada. Women who do sex work have experienced averse effects as a result of that discrimination and continue to.

These issues are ongoing and as such this complaint is not out of time. Examples made in some areas of the Health Portfolio work are just that, examples. Currently women who do sex work are not being offered any service to improve Environmental and workplace health, address health concerns nor the Health care system.

Across the globe, in International arenas and here at home, it is recognized that women who do sex work are human rights holders. According to Health Canada's own information - more than 16,000 women are living with HIV in Canada as of 2022. How many of them are or were sex workers? we may never know due to the barriers created by stigma and the denial of service and discrimination being perpetuated by Health Canada

Health Canada's assertions that women who do sex work do not qualify for human rights is a reflection of how deep this discrimination runs and it's persistence in an ongoing way.

Complainant is requesting amendments/reconsideration of the policies and practices outlined above, Health Canada does have authority to amend the policies and practices, as these policies and practices do fall within its purview and are not independently managed by separate federal entities. Furthermore, as outlined above, sex workers are not included for consideration in Health Canada's relevant research, policies, priorities, and programs as asserted by Health Canada and as outlined above.

RCMP

The 2 complaints against the RCMP are related to reporting of violence and housing discrimination.

I will be brief with these as I am sure we are all aware of the issues with reporting violence when we experience it and the problems caused by RCMP.

The RCMP's policies and practices around reporting of sexual and physical violence make it so that it is not safe for sex workers to file reports when crimes have occurred.

[1] In sections [6] through [26] of the RCMP response, the RCMP suggests that the CHRC should not deal with the complaint pursuant to paragraph 41(1)(b) of the CHRA because the complaint could have been more appropriately dealt with according to another procedure provided for under an Act of Parliament, other than the 1 RSC 1985, c H-6. 2 CHRA, namely, the Public Complaints/Civilian Review and Complaints Commission for the RCMP (CRCC) procedures set out in the Royal Canadian Mounted Police Act 2.

[2] Sex workers do not trust police and do not trust the RCMP as established in research evidence provided and the Complainants experiences providing supports to sex workers wishing to report a crime and as such do not trust a process which is connected to the RCMP.

[3] The Plaintiffs assertion that there is no significant difference between the CHRA processes and the CRCC processes is a reflection of the foundation of this complaint. The CRCC is a Police Process involving civilians. Due to historical, current and continuing discrimination against women who do sex work by the RCMP, this is not a safe process for our community and is not available to us. RCMP continue to deny any discrimination exists as is reflected in their response to this complaint.

[4] The Complainant submits that the CHRC and CRCC processes contain a significant difference in that the CRCC is a police complaints process and as such this complaint should be investigated and heard in the CHRC process not the CRCC process.

[5] It is under direction from women who do sex work and as their choice, to engage this complaint via the CHRC process not the CRCC process. It is our assertion that the processes are significantly different and as such the CHRC process is appropriate for dealing with this complaint.

[6] Due to the stigma sex workers experience which is well documented, no particulars about any individuals who have made complaints or been affected by the denial of service by the RCMP will be revealed or shared.

[7] The Complainant is not sharing "personal beliefs" as is asserted by the Plaintiff. The denial of service, lack of care, placement sex worker safety as secondary and bias experienced by sex workers interacting with RCMP is well documented and plain for anyone to see.

[8] The Plaintiffs assertions that the Complainant has made "bald allegations with no basis in fact" infers the Complaint is a liar not un-ironically as many women who do sex workers are also called liars when they try to report as victims of crime.

[9] An on-line search of the incident involving RCMP Officers assisting in targeted inspections in efforts to remove sex work from the City of Richmond reveals the news media coverage of the directive and the instant chilling effect it had on sex workers safety and the damage caused in undermining years of work to build trust between sex workers and the RCMP in that city.

[10] This action occurred in February of 2024 and so is not "out of time".

[11] The Complainant is not making "bald assertions" nor is she expressing her personal opinions or perceptions on these issues. These issues are ongoing and plain for anyone to see.

[12] The Plaintiff shares no rebuttal or information on any ways in which the RCMP have honoured their Values and Code of Conduct regarding the lives and safety of sex workers.

[13] The RCMP are aware of the challenges caused by decades of discrimination against women who do sex work and have done nothing to work to address this denial of service instead reinforcing the barriers women who do sex work face when they are the victims of crime.

[14] The dates of incidents which include the name "Susan Davis" as noted in the Plaintiffs response are not incidents where the Complainant is the victim of crime but rather a reflection of the many years of work by the Complainant to facilitate women who do sex work in filing complaints when they are victims of crime.

[15] These incidents rarely end in an actual report of a crime as the Complainant must advise the victim that is not safe for them to contact their local detachment and to feel supported, not re-victimized, by their interactions with officers there.

I have over 22 years of experience working with police services, including the RCMP, regarding violence against sex workers and how police enforcement, rather than preventing harm, often increases it by fostering mistrust, discrimination, and stigma. I personally experienced dismissive and incompetent RCMP responses following a violent assault.

Key Issues Highlighted:

- **Distrust and Stigma:** Broad-based enforcement undermines trust, discouraging sex workers from reporting violence due to fear of judgment and re-victimization.
- **Systemic Discrimination:** Despite policies like the Sex Work Enforcement Guidelines—which advise minimal enforcement and prioritize safety—the RCMP continue discriminatory practices, ignore the guidelines, and carry out harmful actions.

- **Targeted Enforcement:** Examples include the RCMP shutting down safe, municipally licensed sex work venues and conducting traumatic, warrantless raids under the guise of fighting human trafficking.
- **Human Rights Violations:** These actions violate the rights and safety of sex workers, particularly those who are racialized, migrant, or precariously housed, echoing concerns raised by UN and European human rights bodies.
- **Accountability Failures:** The RCMP is criticized for not adhering to its own stated core values (respect, compassion, integrity), refusing to engage meaningfully with sex workers, and failing to take responsibility for the harm caused.

Conclusion:

The author argues that sex workers in Canada continue to face systemic discrimination and rights violations at the hands of police, especially the RCMP. Despite existing guidelines and mounting evidence of harm, enforcement actions prioritize ideology over safety, leading to ongoing violence, trauma, and exclusion for sex workers.

Housing

RCMP training materials for home owners which equate sex work with drug users and crime are in use across Canada. The materials contain discriminatory statements which equate sex workers with gangs, drugs, violence and crime. This gives power to those controlling our housing which leads to exploitation. This also excludes sex workers and other young people from housing opportunities.

The BCCEC recently completed a project about housing exclusion which highlighted the Crime Free Multi Housing Program and the use of Good Neighbour Agreements which prohibit prostitution as part of the terms of Tenancy....

The crime free multi housing project trains property managers and landlords how to recognize and exclude sex workers from housing. It describes sex workers as dangerous to the community, bringing crime to apartment buildings and as drug users. It states explicitly that landlords and property managers do not want sex workers in their buildings. It also promotes surveillance of suspected sex workers and reporting to police.

The photograph used in the training is of a woman's hands holding a bunch of money and a dirty bed room. The training also suggests that landlords and property managers should choose their words carefully when denying a tenancy so as to not violate people's human rights.

This program has been in use in Canada since 1991 and is still in use to this day by RCMP detachments across the country.

Once again, in spite of sex work supposedly being decriminalized in Canada and denial of tenancy based on a legal source of income being illegal....sex workers still face violence, discrimination, exploitation and worse as a result of this learned and accepted discrimination through training by the RCMP .

They used all of the same arguments I have outlined in the previous cases. That sex workers do not qualify and are not protected by human rights.....

I won't go into too much detail as at this point we're getting tired I am sure!!

I will say we have had some good news however!!!

The Good News!!

On March 21, 2025 - I received a notice of decision from the CHRC in relation to the cases against the RCMP;

Susan Davis (the "Complainant") identifies as sex worker who also advocates for other sex workers in Canada. She alleges that the Royal Canadian Mounted Police (the RCMP or the "Respondent") discriminated against her and other sex workers on the basis of sex by engaging in enforcement actions that jeopardize their lives and safety.

The Respondent alleges that they have not been provided enough information to properly respond to this complaint and that another process is available to address the human rights allegations the Complainant raises, namely the Civilian Review and Complaints Commission (CRCC) process. -2-

DECISION

The Commission decides to deal with this complaint and to appoint a conciliator to attempt to bring about a settlement of this complaint. If a settlement is not reached, the Commission decides to refer this complaint to the Canadian Human Rights Tribunal. This decision is made under subsection 41(1), section 47 and subsection 49(1) of the Canadian Human Rights Act.

So the RCMP had argued that these cases should be heard in the RCMP civilian oversight process and I had argued that we don't trust their process and have a right to chose the CHRC instead and **we won!!**

This decision also states that I had provided enough evidence for the RCMP to understand and address the complaints but chose not to instead the RCMP focused on trying to take control of the complaints through their own process....

So now I am going into mediation with the RCMP on July 29th....wish me luck!!

We also have achieved a settlement...with Health Canada!!!

I have not received the decision in writing yet so will not go into the details too much...

This decision means that sex workers human rights have been confirmed in Canada and sex workers will be established as rights holders.

There is no financial remedy associated with this settlement. The maximum payable is \$20,000.00 and if you remember I did not have good luck with asking for a financial remedy with FINTRAC and the Banks....

Money is not what we were after anyway...we want them to change the policies and practices which are causing us harm....

So...this effort has already given us the result we wanted - sex workers rights are human rights in Canada!!

In closing, If anyone has any questions about any of this or if you are interested in mounting a human rights complaint of your own, please feel free to contact me and I will share anything I have in support of your case.

Thanks everyone for taking the time to hear about the fight for human rights for sex workers in Canada!