

Information on proposed changes to NT Sex Industry Laws

You may have heard that the laws for sex workers and the sex industry in the Northern Territory are changing. Before laws change there is often a process of consultation. The NT government has released a discussion paper that poses questions and options as well as an online survey that the public (including sex workers) can complete to have your say.

Full decriminalisation:

- Removes police as regulators of the sex industry;
- Repeals criminal laws specific to the sex industry;
- Regulates sex industry businesses through standard business, planning and industrial codes;
- Does not single out sex workers for specific regulation; and
- Is a whole-of-government approach to regulation.

This is an important opportunity to make sure the Northern Territory government understands why sex workers want full decriminalisation.

They will hear many people's opinions but as sex workers we know how different models of regulation impact on our work and our safety.

NT sex workers are calling for the full decriminalisation of sex work.

The government discussion paper says decriminalisation but describes a licensing framework.

As a result it's important to explain the failure of licensing frameworks, the evidence supporting full decriminalisation and what is wrong with the laws in the NT.

Full decriminalisation is NOT:

- registration of private sex workers
- registration/licensing of sex industry businesses
- restriction to '18+ only districts'
- mandatory sexual health testing
- mandatory condom use laws
- police regulating sex work or our workplaces
- treating private sex workers as a 'one person brothel' or 'sole operator'

SURVEY ENDS 30 APRIL 2019 - Let's make sure they hear from sex workers and sex worker organisations before they draft new laws.

Decriminalisation is not licensing/registration.

Sex workers want full decriminalisation in NT !

This information pack is to assist people to have a say on the proposed laws.

It includes information on:

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Where to locate the discussion paper and survey

<https://haveyoursay.nt.gov.au/regulationsexindustry>

Having your say as a community member/sex worker/business operator/allied stakeholder

As a Member of the Community

You can add your opinion to the survey without identifying yourself as a sex worker. Many other members of the community will be doing just that. They will not feel the need to identify what they do. Take advantage of being part of the community.

As a Sex Worker

You may want to say you are a sex worker and discuss the way the laws will impact on your work – it is important for the NT Government to understand the real impact of the laws and proposals from sex workers.

If you cannot identify yourself consider using your working name or another name and state why you are doing so – ‘for privacy reasons’ or ‘to protect my safety’.

As a Manager or Operator

If you are involved in the sex industry you have a right to point out how the laws will impact on your work and your business.

Allied stakeholders

Support sex workers’ right to health, safety, inclusion and justice and to be free of police entrapment and discriminatory laws and policies. Add your voice to demands of NT sex workers and support the full decriminalisation of sex work, sex workers, our workplaces, clients and third parties essential for sex workers’ rights, health and safety.

This is the opportunity for the Northern Territory government to move away from its current failed approach of registration and licensing and toward the full decriminalisation of sex work. **The aim of legislation should be to provide health, safety and rights to ALL Northern Territory sex workers.**

It would be a mistake if the NT government decided to implement a system that included either sex industry business or individual sex worker registration or licensing. This approach has demonstrated, in other parts of Australia, to: create a two tiered system with the majority of the sex industry operating outside of the legal sector; be an expensive system; result in high levels of non-compliance and reinforce police as regulators. In many parts of the discussion paper the discussion notes imaginary benefits of licensing or registration including the ability to surveil or count the number of brothels, even though the evidence in other states demonstrates the approach creates an illegal, ‘underground’ industry that cannot be quantified.

Laws in the Northern Territory

The sex industry laws in the Northern Territory are covered by the Prostitution Regulation Act 1992. In summary:

- Escort agencies that are registered can operate in the Northern Territory under a licensing system.
- Sex workers who work for an escort agency must be registered with Commission of Police – on a lifelong register. Sex workers who have had a relevant drug offence in the last 10 years cannot be registered.
- Brothels, massage parlours or other sex industry business models are illegal.
- Sex workers are permitted to provide escort services to a client's home or from a hotel room, however they cannot arrange or organise the booking from the same place as where the service is provided.
- Sex workers are not permitted to work with another sex worker, in small groups or co-ops; hire support staff (such as a security person, driver, receptionist, etc.) or work from their own home.
- Street based sex work is illegal.

Note: The discussion paper refers to 'solo workers' and 'one worker brothels'. These are NOT definitions under the current Act and are not terms used by sex workers. These terms are repeatedly used in the Discussion Paper as if to limit the discussion to sex workers working alone and to imply that sex workers working from home should be subject to brothel legislation that does not apply to other home occupations. Scarlet Alliance does not support the use of these definitions for the Northern Territory where it is a priority that sex workers can maximise their safety, reduce isolation and cost share by working with another sex worker.

Licensing and registration and how they have failed

The Northern Territory is the only jurisdiction in Australia to still have a system of police registration of sex workers. This approach is discriminatory and provides no positive outcomes for sex workers.

The Kirby Institute's 2012 Report to the NSW Ministry of Health states that licensing is a 'threat to public health' and should not be regarded as a viable legislative model.

Queensland and Victoria sex industry laws have a licensing framework and provide comprehensive evidence of the model's failure.

The Victorian licensing model:

- has resulted in extremely high levels of non-compliance. There were 95 licensed brothels and up to 70 unlicensed brothels in 2006.
- In 2015 there were 88 licensed brothels and an unknown number of unlicensed brothels (police estimate that there could be up to 350 businesses operating as

unlicensed brothels); 50% of Victorian sex workers were still operating illegally in 2012;

- has resulted in police replacing Consumer Affairs as key regulators of the sex industry in Victoria. The Sex Industry Coordination Unit (SICU) is responsible for addressing the high level of illegal brothels;
- has created a group of 'clandestinas', who fall outside health interventions and miss targeted health programs;
- the LASH (Law and Sexual Health) report in 2012 recommends that the licensing of sex work should not be regarded as a viable legislative response. It states that licensing is a 'threat to public health';
- requires private sex workers to register their legal names and address on a permanent register, interfering with privacy, limiting ability to travel, and affecting access to justice in court;
- prevents private sex workers seeing clients at their own home/apartment or at a hotel room booked by the sex worker meaning sex workers must visit clients in their homes or a hotel room the client has booked.

After more than 19 years implementation, the Queensland licensing model:

- has resulted in extremely high levels of non-compliance. Only 20 legal brothels have been licensed in nineteen years in Queensland;
- within two years of implementation, 201 towns or areas were granted permission to refuse brothel development applications – giving sex industry businesses in those areas no option but to operate illegally.
- is inherently expensive costly in excess of \$10M and requires an annual Government top-up to cover the cost of the licensing authority.
- In 2017, approximately 50% of the Prostitution Licensing Authority (PLA) income was provided by Government grants.
- although the Queensland Government had expected the cost of maintaining the licensing model to be covered by sex industry licensing fees, this has never been realised;
- has required the development of a Police Prostitution Enforcement Taskforce (PET-F). In 2013-2014, 69% of complaints received by the PLA were referred to Queensland Police for response.
- Police are now the regulators of more than 80% of the Queensland sex industry.
- Scarlet Alliance has consistently received complaints from sex workers about police treatment;
- requires a high level of police involvement in regulation of the industry, maximising corruption risk.
- is extremely costly to the licence applicant and creates extreme barriers to compliance.

Decriminalisation

Decriminalisation is the removal of laws specific to the sex industry, including those in the Prostitution Regulation Act (NT) 1992. By repealing the laws which criminalise aspects of sex work, sex workers are able to access the rights and protections afforded to other employees, contractors and small business owners in the Northern Territory.

Full decriminalisation does not include registration or licensing.

Rather than resulting in de-regulation or 'no regulation' full decriminalisation ensures that sex industry businesses are regulated in the same way as other businesses, subject to existing regulatory mechanisms such as local council planning and zoning regulations, WorkCover and the Australian Taxation Office.

In NSW the sex industry is subject to a whole of government regulation including Workplace Health and Safety, council, business, industrial, taxation, migration, planning, health and criminal laws and regulations. Police are not involved as regulators at any level unless there has been a breach of laws, not specific to the sex industry.

Existing laws covering exploitative work practices in any workplace, violence, robbery, fraud, sexual assault, harassment already exist but when criminalisation is lifted sex workers can access the protections of these laws. Sex workers are more likely to report crime or harassment to police when sex work is decriminalised.

Decriminalisation does not require a licensing component as evidenced by the outcomes in New South Wales. Non-compliance where it occurs in New South Wales is the outcome of councils which have chosen to block sex industry business application resulting in a high number of land and environment court cases, many of which found the application by council should have been approved. This has been resolved in NSW with a move to panels who consider a number of development applications, not only those relating to the sex industry.

A decriminalised system amplifies opportunities for outreach, magnifies capacities for peer education, supports sex worker self-determination, maximises compliance, increases transparency and minimises discrimination. Licensing or registration as outlined above create significant negative impacts on sex workers.

Decriminalisation has brought improved work safety, high rates of safer sex practice and low rates of sexually transmitted infections with no evidence of organised crime in the New South Wales sex industry.

The NSW sex service premises planning advisory panel highlighted that 'establishing planning controls which are reasonable (rather than unnecessarily restrictive) is likely to result in a high proportion of sex services premises complying with council requirements, with corresponding benefits to council operations, the local community and health service providers'.

[The Lancet Series](#) on HIV and sex workers showed that decriminalisation of sex work would have the greatest effect on the course of HIV epidemics across all settings, averting 33–46% of HIV infections in the next decade. Decriminalisation would reduce mistreatment of sex workers and increase their access to human rights, including health care.

And there is ample support for the full decriminalisation of sex work and support is continuing to grow for the evidence affirmed best practice model of sex work regulation. Decriminalisation is supported by United Nations, UNAIDS, UNFPA, UNDP, Amnesty International, International Labor Office (ILO), World Health Organisation, Lancet Medical Journal, Global Alliance Against Trafficking in Women, Global Network of Sex Work Projects, Asia Pacific Network of Sex Workers, and within Australia’s National BBV and STI Strategies.

The Discussion Paper outlines the NSW Select Committee on the Regulation of Brothels Inquiry Report recommending that NSW should implement a licensing system. The NT Discussion Paper fails to recognise that this recommendation was not supported by the Labor or Independent members of this Committee. The Discussion Paper also fails to recognise that the NSW Government itself did not support the recommendations for licensing or registration. The Government in its official response rejected the majority of the flawed recommendations in the Committee report and made clear that the, *‘NSW Government will not be introducing the licensing model described by the final report of the Select Committee because introducing such significant regulatory burdens and police involvement risks creating similar outcomes to recriminalising sex work.’* The Discussion Paper does not highlight the significant positive outcomes from the NSW experience and instead uses the flawed Committee report to suggest NSW itself recommends licensing.

The Discussion Paper describes New Zealand as a *‘better regulatory model’*. The elements of the NZ model that were proposed by some members of the Committee of the NSW Brothels Inquiry were widely rejected by other members of the committee, the NSW Government and by sex workers and community and health organisations. Scarlet Alliance supports the full decriminalisation of sex work and it should be noted that the NZ model contains aspects of licensing, registration and criminalisation which we DO NOT support. The Discussion Paper describes the criminalisation of all migrant sex workers in NZ as *‘anti sex slave provisions’*. Aside from the obvious discrimination of a policy that prohibits foreign nationals from sex working, it is contrary to the strong evidence base that demonstrates that trafficking and exploitation is exacerbated, not reduced, by limiting safe, legal pathways for migrant workers.

What questions are asked in the survey?

The Online Survey and Discussion Paper list a number of questions for you to respond to, including:

1. What would a decriminalised model look like in the NT?
2. Are there learnings from other jurisdictions that have successfully decriminalised sex work that can be translated to the NT?
3. Does the current regulatory model, providing for the licensing of escort agencies, offer sufficient protection of a sex workers rights, including work health and safety, and more broadly public health?
4. Would a decriminalised model improve worker safety, rights and public health?
5. Should solo workers be able to work with other solo workers, or employ a driver or security personnel?
6. Should solo workers be able to offer and deliver their services from their personal residential address?
7. How could this be regulated?
8. What other protections and rights should be considered for solo workers?
9. Should workers have to register with Police to engage in sexual services?
10. Should registration information be destroyed once the sex worker leaves the industry?
11. Should brothels be decriminalised in the Northern Territory?
12. What model of regulation would be most appropriate for the Northern Territory?
13. Should brothels operate like any other business under existing laws?
14. Should one person brothels be permitted in the Northern Territory?
15. Should consideration be given to 18+ only 'precincts'?
16. Are there any other proposals the Government should consider to improve the safety and wellbeing of workers?
17. Are there other legislative considerations that should be looked at if brothels were decriminalised?
18. Should workers in the sex industry be bound by different workplace health and safety laws to other employees and self-employed persons?
19. Are there locations where brothels should not be permitted to be established?

Other key points to make in your submission or survey

Anti-discrimination protections

Anti-discrimination protections are essential for sex workers and important to supporting the implementation of full decriminalisation. There was a recent inquiry into the proposed Modernisation of the NT Anti Discrimination Act where both Scarlet Alliance and SWOP NT submitted advocating for the important inclusion of 'sex work' and 'sex worker' as protected attributes. For issues and case studies of NT sex workers, including discriminatory provisions in current legislation see *Sex Worker Outreach Program (SWOP NT) & Sex Worker Reference Group (SWRG) Collective Submission in response to the Northern Territory Government Discussion Paper on Modernisation of the Anti-Discrimination Act*:

<https://www.ntahc.org.au/programs/sex-worker-outreach-program-swop-nt/parliamentary-submissions>

Mandatory testing for sexually transmissible infections/HIV

The *Eighth National HIV Strategy* and the *Fourth National Sexually Transmissible Infections Strategy* recognise voluntary testing NOT mandatory testing as best practice and explicitly identifies mandatory testing of sex workers as a key barrier to evidence based prevention, access to testing and healthcare services.

Mandatory testing 'endorses a false sense of security in the form of a "certificate", which, due to window periods, doesn't actually confirm a sex worker's sexual health status, but instead just indicates that the sex worker has participated with the states' mandatory testing regime.

Mandatory testing places an unnecessary burden on sexual health clinics which are already beyond capacity. Sex workers in need of access to sexual health service quickly are particularly marginalised by mandatory testing regimes.

The cost of over-testing is high - screening sex workers for HIV every 12 weeks costs \$4mil for every one HIV infection averted.¹ An Australian study of the cost benefit of mandatory testing in Australia recommended that testing should not be 'locked by legislation'.²

Mandatory testing of sex workers is considered a rights violation by a number of international human rights organisations, such as by the United Nations Human Rights Office of the High Commission for Human Rights and UNAIDS. In Australia, mandatory testing has had negative consequences for sex workers confidentiality, human rights and industrial rights.

Mandatory condom use laws

Mandatory condom use is based on the assumption that without legal intervention safer sex practices will not be implemented. Research demonstrates that there are high rates of

¹ Wilson, D. P., Heymer, K.-J., Anderson, J., O'connor, J., Harcourt, C., & Donovan, B. (2010). 'Sex workers can be screened too often: a cost-effectiveness analysis in Victoria, Australia'. *Sexually transmitted infections*. 86(2).

² Ibid.

condom use amongst sex workers, including migrant sex workers, in jurisdictions that do not legally mandate sex workers to use condoms. For example, The *Sex Industry in NSW: a Report to the Ministry of Health* study found that condom use by sex workers was approaching 100% in Sydney brothels with no differences for migrant sex workers.

Mandatory condom use laws are difficult and costly to enforce, leading to entrapment of sex workers by police and barriers to sex workers access to health and justice services.

The implementation of sex worker peer education programs has been central to maintaining low rates of STIs and BBVs amongst sex workers. Peer educator programs in Australia were instrumental in persuading brothel managers and workers to adopt safer sex practices. Condom use in brothels rose from under 11% of sexual encounters to over 90% between 1985 and 1989 and high rates of condom use has been consistently maintained by sex workers since and the health of sex workers improved commensurately.

Registration/licensing does not allow monitoring of the number of brothels

Registration and licensing has never succeeded and do not provide an accurate picture of the sex industry. The majority of sex work businesses are unable to comply with the onerous requirements of licensing and are forced to operate outside of the legal framework.

50%-80% of the sex industry cannot operate/work legally in Victoria and Queensland respectively within the licensing framework. In ACT where individual sex workers were required to register from 1994 until the laws were repealed in August 2018, only 14 sex workers had ever registered demonstrating the failure of registration.

In the Northern Territory where escort agencies require a form of licensing there are no escort agencies currently registered. In Queensland where a licensing framework has been in place for nineteen years there are only 20 licensed brothels within the entire state.

Home based private or independent sex workers

Home based private sex workers (referred to as 'solo workers' or 'one person brothels' in Discussion Paper) should not be subject to registration or the same regulation as brothels).

Requiring home based private sex workers to be subject to the same requirements as brothels or to registration conditions not required of any other home occupation is discriminatory and fosters stigma against sex workers. Enforcing unnecessary and discriminatory regulation creates an inevitable underclass of 'illegal' sex workers who are unable to comply with restrictive and invasive registration systems and who face significant barriers to accessing essential support, services and justice, such as reporting crime to the police. Research from NSW has demonstrated that there are minimal amenity and safety impacts to the community as a result of home-based private sex workers.³

Another study which surveyed the perception of 401 residents in two neighbourhoods in NSW found that, despite residents assumptions around public nuisances and private sex work, '43% of respondents were unaware of living or were uncertain that they lived near a

³ Prior, J., & Crofts, P. (2015). Is Your House a Brothel? Prostitution Policy, Provision of Sex Services from Home, and the Maintenance of Respectable Domesticity. *Social Policy and Society*, 14(1).

sex premise, while a further 30% were aware but noted no impact'.⁴ The study found that 'those who had been aware of sex premises operating in their neighbourhood for a number of years appeared less likely to report negative impacts than those who had more recently become aware of their existence, suggesting that established sex premises had acted to mitigate any negative local impacts, or simply that residents had realised that sex premises created few problems'.⁵

Private or Independent sex workers

Private or Independent sex workers (referred to as 'solo workers' in the Discussion Paper) should not be forced to work alone

Independent sex workers should not be restricted from working with other workers for their safety, to share costs, to reduce isolation and to enable peer support. Independent sex workers who are not in a management or employment relationship to each other can legally work together in Tasmania, NZ and in many parts of NSW without negative legal or amenity impact. Sex workers have reported greater flexibility, improved WHS, reduced overheads and a greater sense of security. In New Zealand four sex workers can work together in a co-op style workplace.

In states where sex workers must work alone or illegally, sex workers have reported frequent police entrapment, harassment and arrest. These independent sex workers report being forced to work longer hours in order to cover the costs of operating and reduced control over their work and safety strategies.

Not all private sex workers want to or will always work with another sex worker. However, in the instance that a private worker should choose to do so, they should be able to and should not be subject to entrapment and criminalisation as a consequence.

Street based sex workers are not 'protected' by continuing prohibition or control

Prohibition or laws seeking to 'control' street based sex workers are ineffective and create increased risks and barriers for sex workers. Sex workers' safety is placed at risk as they must prioritise evasion of authorities over safety strategies. These approaches limit the ability for sex workers to safely screen clients and negotiate their services. Criminalisation and police enforcement disrupts peer networks and displaces sex workers from usual places of work, making it difficult for outreach services to find people and hindering sex workers ability to organise. It creates significant barriers for street-based sex workers to report crime to the police in fear that reporting will result in charges being laid against them.

Zones, 18+ precincts or relegated to isolated industrial areas

Restricting sex workers to isolated industrial areas is a risk to the safety of sex workers. Issues have been highlighted by sex workers forced to work in industrial zones where they have no access to public transport, poor lighting and no amenities. This risk is exacerbated for the large number of sex workers who work at night.

⁴ Hubbard, P., Boydell, S., Crofts, P., Prior, J., & Searle, G. (2013). Noxious neighbours? Interrogating the impacts of sex premises in residential areas. *Environment and Planning A*, 45(1). Pg 8

⁵ Ibid.

Sex workers strategically choose the location of their work based on access to essential services, public facilities including public transport, access to clients, visibility, lighting and safety. Zoning of sex industry premises to isolated, poorly lit, under resourced and unsafe areas undermines sex workers' safety.

There is no evidence to support the value of segregating sex industry businesses or sex workers to '18+ precinct areas'. The approach is fundamentally in opposition to the principles underpinning decriminalisation of sex work.

Sex workers rates of STIs and HIV

Research and surveillance demonstrates sex workers have maintained rates of HIV and sexually transmissible infections (STIs) in Australia that are equal to, or in many cases lower than the general population, and there are high levels of condom use and testing. Studies show migrant sex workers have similarly low rates of STIs and HIV. Decriminalisation supports this. In their 2005 comparative study of brothels in Perth, Melbourne and Sydney, Harcourt et al. found that of three Australian approaches to sex work legislation (criminalisation, licensing and decriminalisation), decriminalisation (in NSW where there is no registration/licensing) led to the best health outcomes. Sex worker access to health providers and outreach is best supported by decriminalisation.

Further reading and reliable research

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