



**Submission to the Standing Committee on Justice and Human Rights
Review of the *Protection of Communities and Exploited Persons Act*
SUBMITTED BY: Defend Dignity**

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[Defend Dignity](#) is a national organization that exists to end all forms of sexual exploitation in Canada. We have worked with survivors of sexual exploitation across Canada since 2010. In 2015 we started offering our semi-annual Survivor Support Fund to financially aid individuals who have experienced sexual exploitation. We are actively engaged in advocacy with corporations and all levels of government. We have participated in numerous committees and consultations, including appearing as witness when *PCEPA* was being considered in 2014. We partner with local and global survivor-led agencies, service providers, and non-profit organizations. One of our partnerships is with the Epik Project, which educates sex buyers on the inherent harms of prostitution. We have also run public awareness campaigns on billboards and social media ads to educate on *PCEPA* and reduce demand for paid sex. In May 2021, 1,200 attendees joined our first [Canadian Sexual Exploitation Summit](#), which included specialized sector trainings. We have hosted numerous other events to educate over 10,000 people on various aspects of sexual exploitation and have co-developed a youth training curriculum.

The complexities of assessing *PCEPA*'s impact

PCEPA marks a huge shift in Canada's approach to prostitution. It recognizes prostitution as a form of sexual exploitation, inherently violent, and a gendered practice where predominately males buy sex from women and girls. It rejects the idea that prostitution can ever be made safe and that people with power and money have the right to purchase sexual access to the bodies of those who often have limited options. It affirms the dignity and equality of everyone in Canada, by affirming that no one deserves to be forced by circumstances or coercion into a practice that poses a high risk of harming them. Instead, everyone should have access to supports, services, and viable alternatives. This is the Canada we are working towards. For this model to reach its full potential, there must be widespread commitment and partnership to apply all aspects of this approach: educating the public, equipping law enforcement and the justice system to fulfill both the attitude and provisions of *PCEPA*, and sustained investment in supports and services.

It's hard to review a model that has yet to be fully implemented. There hasn't been a unified approach or national commitment, rather the extent to which regions and municipalities utilize *PCEPA* varies greatly. Some barriers are a lack of resources and lack of training to understand *PCEPA*. We have had positive outcomes in the areas of Canada that have embraced *PCEPA*. For example, there are holistic approaches used in cities like Edmonton, London, Saskatoon, and Winnipeg. They utilize partnerships between diverse stakeholders including experiential individuals, community members, law enforcement and service providers. Some of these cities

also have restorative justice programs, which are briefly described in Recommendation #1. There are also provincial initiatives that have embraced *PCEPA*'s approach, including Quebec's Select Committee on the Sexual Exploitation of Minors (2020) and Manitoba's Tracia's Trust strategy (2019).

There are gaps in public awareness, resulting in confusion over *PCEPA*'s provisions and purpose. For example, a 2018 Ipsos poll found that 67% of Ontarians thought that all aspects of prostitution are illegal. Seventy-five percent of Ontarians thought that prostitution is harmful to women and girls and when informed about the details of *PCEPA*, 58% of Ontarians support the legislation¹. Similarly, a 2020 Nanos survey found that Canadians are five times more likely to support than oppose *PCEPA*. The majority of people support *PCEPA* when they understand what it is².

We also need to consider what does success look like and how are we measuring it? To accurately assess *PCEPA*, there must be an accurate understanding of its purpose and provisions. This includes a thorough consideration of the Technical Paper on *PCEPA* (Department of Justice Canada, 2014) and *PCEPA*'s Preamble. These reference numerous harms inherent in prostitution and who those harms impact, including individuals selling sex, females, children, communities, and society. *PCEPA* has a huge focus on prevention, which can be hard to measure. For example, what is the societal impact of refusing to normalize a practice that is founded on gender inequalities and power imbalances? Or how many teenagers and adults have been prevented from entering prostitution, because it is illegal to recruit people and set up businesses that sell other people's sexual services? This can be hard to detect, but if repealed, a growing sex industry will require more individuals to meet the demand for paid sex.

After *PCEPA* was put in place, there was a significant drop in the number of homicide victims who sold sex, despite the increase in the total number of homicides in Canada (Allen & Rotenberg, 2021). Defend Dignity has heard positive - and sometimes life-changing - impacts from survivors of prostitution. For example, we have had survivors tell us that *PCEPA* has saved their lives and that they have been able to exit prostitution because of *PCEPA*. We have interacted with parents who are so grateful for the protection *PCEPA* offers their children and grandchildren, and others who have tragically lost their children's lives to prostitution before *PCEPA* was put in place. We can look to numerous advocates with lived experience, survivor-led and frontline agencies who all support *PCEPA* as a foundational step in the work to reduce sexual exploitation³. We can also learn from

¹ 2018 Ipsos Poll https://www.ipsos.com/sites/default/files/ct/news/documents/2018-07/lawc_factum_1.pdf

² 2020 Nanos Survey <https://www.nanos.co/wp-content/uploads/2020/08/2020-1689-LAWC-July-Populated-Report-FINAL-Updated-with-Tabs.pdf>

³ One example: in June 2021 over 200 stakeholders urged the Prime Minister to support *PCEPA* <https://defenddignity.ca/survivors-of-sexual-exploitation-and-stakeholders-send-joint-letter-asking-prime-minister-trudeau-to-uphold-and-defend-pcepa/>

other countries who have implemented the Equality Model. Sweden and Norway's success – including a decrease in the demand for paid sex and the extent of prostitution and sex trafficking - and the resulting growth in international support for the Equality Model is summarized in *PCEPA's* Technical Paper. The Equality Model has continued to gain popularity - since 2014 it has been adopted by Northern Ireland, France, Republic of Ireland, and Israel. Ireland's Justice and Equality Ministry funded research on the initial impact of their model. There has already been an increased likelihood that women in prostitution will report acts of violence and the report can be consulted for strategy ideas (O'Connor & Breslin, 2020).

Prostitution is inherently dangerous – it cannot be made safe

This is one of the foundational reasons behind *PCEPA*. Prostitution has a high risk of severe and long-term negative impacts on psychological health. A variety of mental health challenges are common in the individuals we support, which were either caused or worsened by their experiences in prostitution. It's common for them to continue to face mental health challenges years after exiting prostitution. A report analyzed studies from 25 countries across the globe with various prostitution laws and found an overall prevalence of 27% suicidal ideation, 20% suicidal attempt, 44% depression, and 29% PTSD in females who sell sex (Millan-Alanis et al., 2021). In Sydney, Australia - where prostitution is decriminalized - a study revealed that just under half of women in street-based prostitution met the criteria for PTSD. Eighty-five percent had experienced violence while selling sex, but only 35% had ever reported violence to the police (Roxburgh et al., 2006).

The risk of physical violence is also inherent in prostitution. Many of the survivors of prostitution we work with will attest that screening can never be sufficient to determine which buyers will become violent. It is also an "underground activity" by nature – it takes place behind closed doors (whether that is in a car, hotel, brothel, private residence, massage parlour, etc.). Countries that have legalized or decriminalized prostitution have not been able to stop the violence or deaths of individuals who sell sex. Here is an example from the United States:

"For 29 years (1980 to 2009) prostitution was decriminalized in Rhode Island. Lack of laws or regulations created a permissive legal, economic and cultural environment for the growth of sex businesses. During this time, sexual exploitation and violence against women and girls were integrated into the economic development of urban areas. The number of sex businesses grew rapidly during this time period. Organized crime groups operated brothels and extorted money from adult entertainment businesses. Rhode Island became a destination for pimps, traffickers, and other violent criminals. The lack of laws impeded police from investigating serious crimes." (Shapiro & Hughes, 2017). The violent criminals included serial killers, and tragically women selling sex were murdered.

In Germany, the number of victims of murder or attempted murder were nearly the same after legalization in 2002. There were an estimated 65 victims from 1990 to 1999; 62 victims from 2000

to 2009 and 59 victims from 2010 to 2017. The majority of murders now occur indoors, including in brothels equipped with panic buttons, security guards, and security cameras (Schon & Hoheide, 2021).

In New Zealand, just over one third of individuals selling sex felt they had to accept a client when they had not wanted to. In Christchurch, these percentages were higher: 44% of “street-based workers”, 45% of “managed workers,” and 38% of “private workers.” In addition, nearly one fifth of individuals selling sex “had experienced a work-related injury...most of the injuries were sustained through violent altercations with clients, or clients who had been too rough, causing vaginal or anal trauma. There were some reports of sprained wrists and ankles, pulled muscles and back pain as a result of working” (Abel et al., 2007). Individuals in prostitution still face violence and abuse within New Zealand’s decriminalized model⁴. No matter where prostitution takes place, it poses a significant risk of harming the individual selling sex.

Discouraging the Demand for Paid Sex

Canada ratified the Palermo Protocol in 2002, meaning that we have been obligated under international law to discourage the demand for paid sex for two decades⁵. The CEDAW General recommendation No. 38 (2020) reinforces the importance of this commitment: “Sexual exploitation persists due to the failure of States parties to effectively discourage the demand that fosters exploitation and leads to trafficking. Persistent norms and stereotypes regarding male domination and the need to assert male control or power, enforce patriarchal gender roles and male sexual entitlement, coercion and control, which drive the demand for the sexual exploitation of women and girls.” A growing body of research documents harmful behaviours and attitudes among sex buyers⁶. Canada must discourage the demand for paid sex by continuing to criminalize the purchase or attempt of purchase of sex under s.286.1 and adopting other measures to reduce demand. Not only does this curb sexual exploitation, but it also prevents normalizing the commodification and objectification of predominately female sexuality.

⁴ Wahine Toa Rising is survivor-led organization raising the voices of those in prostitution:
<https://wahinetoarising.nz/survivors-stories/>

⁵ Article 9(5): “States Parties shall adopt or strengthen legislative or other measures, such as educational, social or cultural measures, including through bilateral and multilateral cooperation, to discourage the demand that fosters all forms of exploitation of persons, especially women and children, that leads to trafficking.”
<https://www.ohchr.org/Documents/ProfessionalInterest/ProtocolonTrafficking.pdf>

⁶ A sample of some of the studies: Jovanovski, N., & Tyler, M. (2018). “Bitch, you got what you deserved!”: Violation and violence in sex buyer reviews of legal brothels. *Violence Against Women*, 24(16), 1887-1908.

<https://doi.org/10.1177/1077801218757375>

Durchslag, R., & Goswami, S. (2008). *Deconstructing the demand for prostitution: Preliminary insights from interviews with Chicago men who purchase sex*. Chicago: Chicago Alliance Against Sexual Exploitation.

<https://humantraffickinghotline.org/sites/default/files/Deconstructing-the-Demand-for-Prostitution%20-%20CAASE.pdf>

Continuum of Harm

Every Spring and Fall we receive 50-70 applications from individuals who want to exit or stay out of prostitution and are working towards their goals and dreams. They often seek support to pursue education, secure safe housing, create a stable environment for their children, repay debt accumulated by an exploiter, access trauma therapy and other health services, etc. Their experiences highlight that entering, remaining in, and exiting prostitution are often influenced by many factors such as debt, housing insecurity, lack of education, lack of alternative employment opportunities, mental health issues, previous abuse, involvement with the child welfare system, substance dependencies, coercion and/or threats from a trafficker. Once they have entered prostitution, most of those factors remain or worsen and they are met with additional challenges originating from their involvement in prostitution. Their circumstances and wellbeing are negatively impacted in this continuum of harm. Many individuals want to exit but feel like that it is not even an option. Others have exited but are concerned that they will have to start selling sex again if they cannot access support. It can take many attempts and years to permanently exit. It's essential for service providers to journey with them, no matter where they are at. We want to briefly highlight just two of the many dynamics at play.

Minors

A high percentage of individuals engaged in prostitution started when they were minors. For example, Vancouver Rape Relief and Women's Shelter (2020) found that 43% of women were younger than 18 when they entered prostitution. Of these, 12% were 13-15 and 12% were under 12. The sexual exploitation of minors is widely condemned, even in countries that legalize prostitution. We must stop and consider, what happens when these young people turn 18? Are they no longer worthy of intervention to protect them from the inherent harms of prostitution?

Trafficking

While not all people who sell sex are trafficked, this Committee cannot ignore the many who are. As the majority of human trafficking cases detected in Canada are for prostitution (Cotter, 2020; The Canadian Centre to End Human Trafficking, 2021), our approach to prostitution has a direct impact on those who are being or are at risk of being trafficked for sex. One key area is in the prevalence of trafficking: countries with legalized prostitution have higher rates of trafficking (Cho et al., 2013; Jakobsson & Kotsadam, 2013; Tallmadge, & Gitter, 2018).

Our partnership with experiential persons and the stories applicants of our Survivor Support Fund have shared with us highlight some other important considerations. While trafficking, coercion, and third-party influence are all common within the system of prostitution, individuals experiencing them often cannot be placed into a binary category of either "trafficked" or "not trafficked." Levels of agency can be seen as a broad spectrum ranging from full autonomy to fully controlled by a trafficker, with many nuances in between. To make matters more complex, many people alternate between periods of being influenced by a trafficker or other third-party and operating more independently. This includes entering prostitution by a trafficker and becoming trafficked after entry. It's important to remember that even in the absence of third-party

influence, many engage in prostitution as a result of constrained choices and lack of viable alternatives. It can also be hard to identify when someone is being coerced by an exploiter for a variety of reasons (Cotter, A., 2020). This is partly because manipulation and psychological abuse are common methods used by traffickers. In addition, the majority of trafficked individuals have some sort of relationship with their exploiters – being trafficked by romantic partners, friends, and family members are all common. Sometimes trafficked individuals do not recognize the coercion until after they have exited the situation and have started their healing journey.

Breaking the cycle of harm

We must continue to offer support for individuals selling sex, while acknowledging that the inherent harms and danger can never be removed and ensuring robust exit supports are accessible to all. O'Connor & Breslin (2020) articulate this as part of their description of Ireland's approach: "In addition to those with a past history of prostitution or an experience of being trafficked, the service also works with women currently involved in prostitution to help minimise the harms and dangers they may be experiencing, while recognising that for the vast majority of women, harm minimisation on its own is not enough. Women also want to explore their options, consider alternatives to prostitution, and make plans for the future. Ruhama [an Irish NGO] facilitates this by offering a wide variety of supports so that the immediate harms of prostitution are not just 'minimised' but removed from the lives of women who choose to exit."

Recommendations

Based on the facts outlined above from our work with survivors of prostitution, service providers, sex buyers, and communities, we make the following recommendations to the Committee:

1. Uphold, Strengthen, and Implement PCEPA across Canada

First and foremost, maintain *PCEPA*'s foundational provisions in the *Criminal Code*: s.286.1 (Obtaining sexual services for consideration), s.286.2 (Material benefit from sexual services), s.286.3 (Procuring), s.286.4 (Advertising sexual services), and s. 286.5 (Immunity). Then, implement the three important elements of the Equality Model: education, enforcement, and sustained investment in supports and services. Reports on other countries' strategies to implement the Equality Model can be consulted, for example Sweden (Ekberg, 2016) and Ireland (O'Connor & Breslin, 2020).

Education

There must be intentional public education on the reality of prostitution and the provisions and objectives of *PCEPA*. This includes warning about the high risk of physical and psychological harms posed by selling sex, available services and supports, why buying sex is so harmful and thus illegal, the criminal immunity and exceptions that are offered to people who sell their own sexual services, how this is a step to advance gender equality, etc. Some ways to educate:

- National public awareness campaigns – these could be organized by Public Safety Canada, Women and Gender Equality Canada, etc. There can also be joint campaigns with partnership between provinces and territories, municipalities, and non-profit organizations.
- Ongoing standardized sector trainings – these can be included in mandatory training of stakeholders including educators, service providers, group home staff, tourism industry etc.
- Partner with the provincial and territorial education ministries to develop standardized school curriculums⁷ that teach about the inherent dangers of prostitution, the risk factors for exploitation, the harms of buying sex, and awareness of how exploiters lure youth. This could be included in curriculum about healthy relationships and sexual education.

Enforcement

There is a lot of work to be done to build trust between law enforcement, the justice system, and individuals selling sex. We see good examples of success in cities where there are active prostitution offender programs in which police, a service provider, and the justice system work collaboratively to ensure that buyers are not only held to account, but they are required to participate in an instructional day around the implications of their sex buying activity. The involvement of trained social workers, counselors, and experiential women results in low re-offending rates in these locations and in experiential women being heard and given the opportunity to work with law enforcement and justice. These restorative justice programs are in place in Edmonton, Saskatoon, and Winnipeg. In Winnipeg funds from the prostitution offender program are used to operate a “jane” school where experiential women receive supports which allows for the further development of trust between law enforcement and the justice system. We recommend that programs in these cities be held up as models for how to address demand and develop trust in those selling sex in a holistic and positive manner.

We also recommend:

- Robust and ongoing training for law enforcement and the justice system of both the attitude and provisions of *PCEPA*, with special emphasis of the decriminalization of those selling their own sexual services
- Law enforcement operating in partnership with those with lived experience, service providers, etc.⁸.

Supports and services

We must recognize that many individuals would not get involved in prostitution if they had viable options and work to alleviate barriers accordingly. Sustained funding for robust wrap-around supports is also needed to ensure that everyone who wants to exit has the option to do so. Ireland has a fantastic approach to offer comprehensive services, including those offered by their Women’s Health Service and Anti-Human Trafficking Team (O’Connor, 2020)⁹.

⁷ See Ontario’s school-based initiative: <https://news.ontario.ca/en/release/1000467/ontario-acts-to-protect-students-from-sex-trafficking>

⁸ One Example: Winnipeg Police Service’s Counter Exploitation Unit: <https://winnipeg.ca/police/ceu/>

⁹ Consult “Appendix B: Description of support services featured in the study”, pages 114-116

2. Repeal Section 213 of the Criminal Code

A main goal of *PCEPA* is to decriminalize those who are selling their own sexual services. Section 213 of the *Criminal Code* predated *PCEPA* and should have been repealed as part of *PCEPA*. Instead, it was amended and subsection 213 (1.1) was added. While very few women are accused under section 213 - the number of women was declining before *PCEPA* and that trend continued with only 5 women accused in 2019 (Allen & Rotenberg, 2021) – it is the only section that still criminalizes people who sell their own sexual services and should be repealed so that they are given full criminal immunity.

3. Ensure immunities and exceptions are correctly understood and applied

A very important aspect of *PCEPA* are the exceptions and immunities for individuals selling their own sexual services that are provided under s.286.2 and s. 286.5. These include ensuring individuals selling their own sexual services can collaborate with each other and access goods and services. Recently these provisions were found to be viable in the Ontario Court of Appeal's decision to uphold s. 286.2, s. 286.3, and s. 286.4 (R. v. N.S., 2022). This suggests that any failure to correctly utilize these provisions could be an application error. There must be thorough and ongoing training and public awareness on the entirety of the purpose and provisions of *PCEPA*, and in this case an emphasis on how they apply to people selling their own sexual services.

4. Expunge offenses related to individuals selling their own sexual services

When *PCEPA* was adopted, it removed the criminal liability in cases where individuals are selling their own sexual services (except for s.213, as mentioned earlier). It follows that expungement should be granted to individuals who have been charged with offences related to selling their own sexual services, including under s. 213. We've seen that a criminal record is a serious barrier to moving forward for some of the survivors we support. The process to receive a pardon is onerous and expensive - on top of the federal fee, there are additional fees to obtain the required documents. If expungement doesn't happen, at the very least they should be offered access to supports and waived fees to obtain a pardon.

5. Implement other measures to reduce demand for paid sex

In addition to our legislative response (s. 286.1), there should be robust initiatives to educate the public on the reasons why purchasing sex is a crime. Some examples are public awareness campaigns, advertising on social media, and advertising on search engines in response to searches for paid sexual services. It should also be included as a topic in sex trafficking awareness initiatives, as the demand for paid sex drives trafficking. Education can also be used as a restorative justice response for those charged with attempting to purchase sexual services. For example, prostitution diversion programs previously mentioned can be effective in changing perspectives and preventing recidivism. More research should be undertaken to understand and address purchasers of sex in Canada. A variety of other measures to address demand can be found in the

OSCE Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings report¹⁰.

6. Consider intersecting laws

It's important to keep in mind that this review is specifically on *PCEPA*, and not the impact of other laws on individuals involved in prostitution. The Committee can recommend amending these in the near future, and in the meantime, recommend how law enforcement and the justice system should apply these laws in cases of individuals selling sex. One example is Immigration laws. Law enforcement personnel should consider not enforcing them when interacting with individuals selling sex and make it very clear that this is the case. This approach is part of the model that is building trust between individuals selling sex and the police in Ireland (O'Connor & Breslin, 2020).

7. Consider the forced criminality of individuals trafficked for sex

We work with survivors who have been forced into illegal activity while they were trafficked for sex. Forced criminality is a method used by traffickers to further exploit their victims. These can be a variety of offenses differing in levels of severity. Sometimes they coerce their victims into recruiting others into selling sex and violating provisions in *PCEPA*. Special consideration should be given to cases where a victim is also an offender, including how to reduce or pardon the penalties for crimes committed under the influence of a trafficker.

Thank you for your work to study this important matter. This review is an opportunity to fully implement *PCEPA* and work towards achieving its full potential.

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