



BY PRIORITY COURIER

December 1, 2010

Barbara Hall
Chief Commissioner, Ontario Human Rights Commission
180 Dundas Street West, 8th Floor
Toronto Ontario
M7A 2R9

Madame Chief Commissioner:

RE: Request for Public Inquiry into Discrimination against Ottawa-area Sex Workers by Ottawa Police Service

By way of this letter, POWER (Prostitutes of Ottawa Work Educate and Resist) formally requests that the Ontario Human Rights Commission conduct a public inquiry into the discriminatory treatment of Ottawa-area sex workers by the Ottawa Police Service (OPS).

POWER is a non-profit voluntary sex worker-led organization made up of current, and former, Ottawa-area sex workers and their allies. This request for an inquiry is based primarily on the findings of the attached POWER report entitled *Challenges: Ottawa-area Sex Workers Speak Out*.¹ This community based research project records the diverse experiences of Ottawa-area sex workers based on a series of 43 anonymous interviews that took place between April 2009 and February 2010.

POWER asks that the Commission undertake a public inquiry because of serious concerns about the OPS' discriminatory conduct towards sex workers on the prohibited grounds of sex, ethnicity, and perceived disability. The OPS' discriminatory conduct creates tremendous physical and emotional harm to individual sex workers. The OPS' discriminatory conduct towards sex workers also facilitates prejudicial and harmful stereotypes against sex workers within the larger community.

The Commission is likely aware that a recent Ontario Superior Court of Justice decision struck down Criminal Code provisions related to sex work on the grounds that they disproportionately

¹ POWER. 2010. Challenges: Ottawa area sex-workers speak out (**attached to this letter** and hereinafter referred to as "the report").

affected the safety and security of sex workers.² The decision is laudable but limited. While it disassembles the legal structure criminalizing sex work, the decision does not examine the actors who administer criminal laws, and who otherwise interact with sex workers in the course of their law enforcement duties. A Commission inquiry is necessary to examine the actions of the police, and their attitudes towards sex workers in Ottawa.

In this request, we explain the following:

1. Why the subject-matter of this request would not otherwise be brought before decision-making bodies, i.e. the Ontario Human Rights Tribunal;
2. Why a public inquiry into the treatment of sex workers by the Ottawa Police Service accords with the Commission's statutory mandate to act in the public interest;
3. How the evidence in POWER's report, and in OPS publications and public statements, demonstrates discrimination towards sex workers on prohibited grounds;
4. The impact of police discrimination on Ottawa-based sex workers;
5. Possible outcomes of a public inquiry into the treatment of sex workers by the Ottawa Police Service.

POWER's report is appended to this Request, and is a detailed account of the challenges faced by Ottawa-area sex workers. The Commission is invited to review the report in its entirety. However, we wish to draw your attention to two relevant chapters (5 and 8). In Chapter Five, *Sex Workers Speak about the Police*, POWER documents specific instances of violent abuse on behalf of OPS. The systemic discrimination central to this abusive treatment is further explored in Chapter Eight, *Intersecting Marginalizations*. This chapter highlights the ways in which police violence experienced by Ottawa-area sex workers is aggravated by discrimination based on prohibited grounds as per the *Ontario Human Rights Code* such as race, ethnicity, gender, and disability or perceived disability.

1. An Inquiry Will Address Matters That Cannot Otherwise Be the Subject of Public Complaints

Because of the criminalized and stigmatized nature of sex work, individuals who engage in it are fearful of being "outed" or being exposed as sex workers. As a result, sex workers are unlikely to make formal human rights complaints against the OPS because they will subsequently be identified as sex workers to the authorities and to their communities.

Under section 34(5) of the *Code*, an organization may file a human rights application on behalf of, or as the representative of, another person. Unfortunately, a representative complaint cannot shield the complainant from ultimately disclosing their identity to the responding party. In a recent Tribunal decision, where a union filed complaints on behalf of migrant workers alleging sexual harassment and assault by an employer, the Tribunal held that all of the migrant workers

² Justice Susan Himel declared unconstitutional provisions relating to communications for the purposes of prostitution, running a bawdy house, and living off the avails of prostitution. The federal government is currently appealing the decision, which means that sex work is still criminalized in Ontario. *Bedford v. Canada*, 2010 ONSC 4264.

needed to provide the Tribunal with signed consents allowing the union to act as their agents. While the Tribunal allowed for an anonymity order prohibiting the publication of the workers' names, the same workers were expected to provide evidence at the Tribunal hearing.³ If POWER were to file individual complaints for Ottawa-based sex workers, it is anticipated that the identities of the complainants would be disclosed to the respondent Ottawa Police Service.

The POWER-lead research was done in a manner that preserves the anonymity of its subjects. As such, dates and other identifiable information are excluded from the final report, as they are from this request for an inquiry. POWER maintains that the confidentiality vested in its data collection process is what likely allowed the organization to obtain information from sex workers in the first place.

Sex work remains a highly stigmatized industry. Known sex workers continue to experience disproportionate amounts of marginalization and social exclusion, and often risk criminalization.⁴

Many Ottawa-area sex workers interviewed by POWER spoke of why they are unable to rely on the police when they themselves have been victims of crimes. Both indoor and street-based workers cite reasons why they do not feel they can turn to the police, including distrust, lack of resources, past experiences of discrimination, a perception that police won't believe them, and fear of reprisal or further abuse (Report, p.61, p.42, p.91, p.93). The reticence to report crime is understandably amplified when the perpetrators are the police themselves. The risk of increased abuse by the police, criminalization, stigmatization and discrimination is simply too high for sex workers to consider filing complaints against the police, either via the official police complaint system or within the provincial human rights scheme.

It is all the more difficult for sex workers to raise concerns regarding police services in the context of a police force where the stigmatization of sex workers is so embedded. Since the OPS publicly perpetuates the discriminatory stereotypes of sex workers as "sick" and drug-addicted (detailed below), it is difficult for sex workers to conceive that any complaints about police conduct would be considered credible.

For all of these reasons, individuals are faced with serious structural and social impediments to attaching their names to human rights complaints against the police that would identify them as sex workers. As such, POWER requests a public inquiry in the interest of its membership and the broader Ottawa community.

2. An Inquiry Into Sex Workers and the Ottawa Police Service Will Serve the Public Interest

Under section 31(1) of the *Ontario Human Rights Code*, the Commission has the power to conduct an inquiry where it is in the public interest to do so. POWER asserts that the ongoing and systemic discrimination of Ottawa-area sex workers by the OPS constitutes a matter of public interest requiring a Commission inquiry.

³ *CAW – Canada v. Presteve Foods*, 2010 HRTO 796 (David A. Wright).

⁴ *The Challenge of Change: A Study of Canada's Criminal Prostitution Laws*, Report of the Standing Committee on Justice and Human Rights, 2006, <http://cmte.parl.gc.ca/Content/HOC/committee/391/just/reports/rp2599932/justrp06/sslrrp06-e.pdf>

POWER also believes that an inquiry would allow the Commission to exercise its functions under section 29 of the *Ontario Human Rights Code*. Specifically, a study of the institutional mistreatment of sex workers in Ottawa from a human rights perspective would have the effect of:

- Emphasizing the dignity and worth of individuals who engage in sex work (s. 29(a))
- Identifying and promoting the elimination of discriminatory practices against sex workers (s. 29(b)(ii))
- Inquiring into incidents of tension or conflict between sex workers, OPS, and other individuals or agencies in the Ottawa community (s. 29(e))
- Assisting the OPS, as a municipal organization, in alleviating tension and conflict in its provision of law enforcement services based on identification by a prohibited ground of discrimination (s. 29(f))
- Reporting to the people of Ontario on the state of human rights in the province (s. 29(k))

In addition to the direct conflict between Ottawa-area sex workers and the OPS, a broader tension exists around the treatment of sex workers. There may be a lack of societal consensus on the moral status of sex work; however, people in Ottawa also disagree over the police treatment of sex workers in their communities.

At one end of the spectrum, anti-sex work attitudes and actions of vocal community members and associations augment the tension around sex work in Ottawa. Both the OPS, and local community organizations, promote the stigmatization of women involved in the sex industry by overtly linking them to the presence of illegal drugs in the community. Furthermore, a number of community associations and initiatives, including programs publicly supported by the OPS, take aggressive and public stances against the presence of sex workers in Ottawa communities.

For example, the “Drugs/ Prostitution Committee” portion of the Together for Vanier website, an OPS sponsored initiative in the neighbourhood of Vanier, provides residents with the OPS call centre telephone number and encourages people to call in and report suspected prostitutes.⁵ The document indicates that “although it is not illegal to stand on the street, if you suspect a prostitute is working in your neighbourhood you should still report it!” This type of initiative is problematic as it invites gender-based stereotyping of women.

Similarly, the Hintonburg Community Association, a longtime opponent of the presence of sex workers in the community, continue to publicly characterize sex workers as drug addicts and aggressively campaign for the elimination of sex workers in their neighbourhood. In their document “Street Level Prostitution: Dispelling the Myths”, the Hintonburg Community Association encourages people to call the police if they see prostitutes on the street.⁶ The publication maintains that prostitution should not be tolerated and asserts that the featured stories “illustrate the link between prostitution and other illegal activities, such as the drug trade, discarded drug paraphernalia and an increase in robberies and violence.”

⁵ Drugs/Prostitution Committee, <http://www.ensemblepourvanier.com/en/drugs-prostitution-committee.php>, **attached to this Request as Tab A.**

⁶ Street Level Prostitution: Dispelling the Myths, 2001, **attached to this Request as Tab B.**

The Hintonburg Community Association has called on all levels of government to protect communities from drug-affected prostitutes.⁷ This facilitates discriminatory attitudes towards sex workers since they are perceived as dangerous, and as completely disabled by addiction. Most recently, it has been reported that the Hintonburg Community Association met with the OPS to discuss how OPS will interpret the recent prostitution ruling.⁸ That OPS is meeting with vocal anti-sex work community associations to discuss prostitution - and is not meeting with sex workers themselves - illustrates the existence of tension around this issue. This uneven process of consultation also serves to create greater divides between interested parties.

The POWER-lead research cites examples of community members at the other end of the spectrum, those who have demonstrated support for sex workers in light of police action. The report includes examples of people who have intervened, and spoken out in defense of sex workers when witnessing them being assaulted, threatened or harassed in public by police officers (Report, p.46, p.58 and p.98). These examples speak to the extent in which the conflict over the treatment of sex workers plays out in the larger community. These examples also suggest that police conduct towards sex workers can be viewed as unacceptable by community standards, without an adjunct conclusion on the morality or legitimization of sex work.

POWER believes that initiating an inquiry into the discrimination of Ottawa-area sex workers falls directly within the mandate of the Commission to review incidents of tension and conflict in communities, institutions and industries as per s. 29 of the *Code*. The personal accounts of sex workers summarized below, and documented in detail in the report, are evidence of the existing conflict, and of the discriminatory manner by which sex workers are treated by the police.

3. Instances of Discrimination Prohibited by the Ontario Human Rights Code

The OPS is required by law to deliver its services in an equitable manner without discrimination based on the prohibited grounds set out in section 1 of the *Code*. The Ontario Human Rights Tribunal has deemed police services to be included in the definition of services for the purposes of s. 1 of the *Code*.⁹

Overwhelmingly, street-based sex workers who were interviewed as part of the POWER-led research describe police behaviour towards them as disrespectful and verbally abusive. Many participants recount name-calling, insults and being ridiculed for their appearances or based on a presumption of drug addiction. All of the 26 female street-based sex workers interviewed as part of the POWER-lead research project reported being verbally abused by the Ottawa Police. In addition to an underlying sense of “whorephobia” (which is discussed at length in the report), it is also clear that much of this mistreatment can be attributed to discrimination prohibited by the *Code*. These accounts of mistreatment demonstrate that sex workers are not being treated equally and in a manner free from discrimination in the provision of police services, as required

⁷ Hintonburg Community Association Seeks Community Protections in Wake of Prostitution Ruling, <http://www.hintonburg.com/news.html#himel>, **attached to this Request as Tab C**.

⁸ Prostitution Ruling Gets Hintonburg Community Association Talking, October 28, 2010, <http://www.yourotawaregion.com/news/article/894362--prostitution-ruling-gets-hintonburg-community-association-talking>, **attached to this Request as Tab D**.

⁹ *Forrester v. Peel (Regional Municipality) Police Services Board*, 2006 HRTO 13.

by the *Code*. A public inquiry needs to be initiated in order to investigate why this form of systemic discrimination persists, and to make recommendations consistent with protecting the human rights of sex workers.

Discrimination Based On Sex

The overwhelming majority of sex workers are women. POWER's research indicates that female sex workers, and women perceived to be sex workers, are experiencing harassment, discriminatory conduct, differential treatment, and sexual assaults by the OPS.

Evidence collected by POWER suggests that women are being harassed and over-policed in public spaces because they appear to be sex workers or have been known to the police in the past. Members of the Ottawa Police Service have been reported as stopping women they believe are working as sex workers based on unrelated behaviours or appearances. For example, one of the women interviewed by POWER reported being stopped and insulted by police for dressing "sexy" (Report, p. 53). Harassing women because of how they look reinforces negative stereotypes about women. It suggests that a woman's social value is linked to her physical appearance, and that a woman who "looks like a prostitute" is less deserving of respect. There is simply no legal basis for OPS to stop women, or to presume criminality, based on their physical appearances. In doing so, the OPS' conduct is arbitrary, discriminatory, and in contravention of the *Code*.

Much of the gender-based discrimination documented in the POWER research involves police officers making derogatory comments of a sexual nature, often referencing the women's perceived association with the sex industry. For instance, a street-based worker recounts police stopping her in public to call her names and asking her how much she charged, telling her that if they were ever desperate they could come see her (Report, p.51). Similarly, another interviewee tells the story of how a police officer asked a friend she was with at the store if she was "training her" (Report, p.60).

The possession of condoms creates another sexually charged means for police to harass women they suspect are sex workers. Women interviewed for the POWER report spoke of police ridiculing them in public for possessing condoms, having condoms confiscated or destroyed, or the possession of condoms being used to incriminate them as proof of their involvement in an illegal sex work related activity (Report, p.59). The mistreatment of women for the sexually-related action of possessing condoms is not only discriminatory, reinforcing harmful stereotypes of women who have sex as dangerous, but ultimately hinders an individual's ability to practice harm reduction and safer sex, potentially putting her at risk.

The POWER report also includes examples of gender-based discrimination in the form of misogynist name-calling by the Ottawa Police, such as:

- yelling at a woman that she is a "cunt" while throwing a lit cigarette at her (Report, p.51)
- yelling that a worker was a "stupid bitch" while physically assaulting her while she was in custody (Report, p.55)
- calling a woman a "dirty whore" while watching her shower in detention (Report, p. 58)
- telling a woman's family member that she was a "hooker" (Report, p.60)

- dismissing a victim as a “crack-whore” when she was trying to report a physical assault (Report, p.105)

Incidents of sexual assault provide the most extreme example of gender-based discrimination against sex workers by the Ottawa Police. The examples contained in the POWER report range in severity but consistently evidence non-consensual acts that are coercive and extremely exploitative. They include:

- grabbing a women’s hand and putting it on his crotch (Report, p. 56)
- having sex with sex workers in exchange for the empty promises of stable housing (Report, p.55)
- removing clothing in public (Report, p.57)
- strip searching in public (Report, p.57)
- leaving a woman waiting custody naked for an entire day (Report, p.58)

The POWER research suggests additional layers of gender-based discrimination at the hands of the OPS. In *Forrester v. Peel (Regional Municipality) Police Services Board (No. 2)*¹⁰, the Ontario Human Rights Tribunal established that transexuality falls under the ground of “sex” under the *Code*. Discrimination against transgendered people clearly falls within the context of police services under s.1 of the *Code*. A transgendered interviewee explains that she is well known to the Ottawa police, that she is constantly harassed, and that some of the officers continue to use her male birth name (Report, p.101). She also tells a story of having been apprehended by a police officer while performing oral sex on a client to then have the officer tell the client that the sex worker “is a man.” This particular mistreatment of transgendered people by the OPS is prohibited discrimination based on sex and is a violation of the *Ontario Human Rights Code*.

Discrimination Based On Ethnicity

POWER believes that the discriminatory treatment described above is often amplified when directed at racialized women.

Although POWER’s research only speaks specifically to the experience of a small sub-set of Ottawa-area aboriginal sex workers, four out of the five aboriginal women involved in this research reported experiencing physical violence by Ottawa police officers. These experiences of violence include:

- throwing food (Report, p.98)
- being chased by a police car (Report, p.97)
- repeatedly being tasered (Report, p.97)
- threats of physical assault (Report, p.97)
- smashing a woman’s head on a police car (Report, p.97)

The one aboriginal sex worker that did not report being a victim of physical violence by the Ottawa Police had experienced racist remarks by the police. This woman recounts being told

¹⁰ Forrester v. Peel (Regional Municipality) Police Services Board (No. 2), para 404-415

when she was being charged with assault that “Innu women have so much anger” (Report, p.98).

Discrimination Based on Perceived Disability

POWER’s research, along with OPS public statements and conduct, demonstrates discrimination towards sex workers based on a perceived disability in the areas of addictions and/or mental health.

The Supreme Court of Canada in *Quebec v. Boisbriand*, has indicated that “discriminatory acts can be based as much on perception and myths and stereotypes as on the existence of actual functional limitations”.¹¹ Sex workers in the Ottawa-area are regularly denied equal treatment with respect to police services based on the stereotypical perception that they are addicted to alcohol and/or drugs, or are characterized as mentally ill.

Regardless of whether or not individuals involved in the sex trade in Ottawa use drugs or have mental health diagnoses, OPS repeatedly and publicly portrays sex workers as unwell HIV positive drug addicts who are dangerous and threatening to the community. The OPS is not qualified to deem a segment of the population as sick or addicted. Their continued attempts to characterize sex workers as physically and mentally ill are based on stereotypes, and constitute discrimination on the basis of disability.

One interviewee points out that Ottawa police often assume she is a drug addict and that these assumptions are reflected in their insults to her (Report, p.50). Specifically, she has been harassed on the basis that she appears to be underweight, a characteristic commonly associated with drug abuse. Sex workers stopped by the police are also mistreated because they are users or suspected users and often called “crack-whores” or “junkies” (Report, p.105).

These narratives demonstrate that discrimination based on perceived disability occurs at the level of service provision. However, as an institution, the Ottawa Police Service makes public statements perpetuating the inaccurate myth that sex workers are all addicted to drugs and infected with HIV.

For instance, the OPS Community Safety Letters Program sends letters to men who are alleged to be consumers of sex work. In the OPS Community Safety Letter, which is publicly available on their website¹², the OPS Central Division Superintendent warns of “a clear correlation between street prostitution and drug use, including crack cocaine, as well as a variety of health concerns including H.I.V. and Hepatitis.” In a related publication providing Questions & Answers about the Community Safety Letter program, the OPS explains that the “problems” of sex trade and crack cocaine are interrelated and that “if the program has an impact on sex trade then it should have an impact on crack cocaine use”.¹³

¹¹ *Quebec v. Boisbriand* [2001] 1 S.C.R. 665, para 39.

¹² OPS SAMPLE Community Safety Letter, <http://www.ottawapolice.ca/en/Community/PartnershipProfiles/CommunitySafetyLetters.aspx>, **attached to this Request as Tab E.**

¹³ Community Safety Letters, <http://www.ottawapolice.ca/en/crimeprevention/communitysafetyletter.aspx>, attached to this **Request as Tab F.**

Not only do these inaccurate statements promote general disdain for sex workers within the larger community, they are most definitively an example of public discriminatory treatment based on a perception of disability.

These discriminatory beliefs reside at the very top of the Ottawa Police Service' decision-making structures. The Ottawa Police Chief, Vern White, has issued public statements questioning sex workers' mental health. In November of 2008, Chief Vern White stated that:

“There are bigger issues involved with prostitution than just prostitution... A lot of them have either addictions or medical issues – mental health or other. Our job is...to try to get them some help.”¹⁴

Chief Vern White reiterated this discriminatory attitude on November 5, 2010, when he sought to distinguish street-based sex workers from those who advertise online by stating that most street-based sex workers are “sick, mentally ill, or addicted.”¹⁵ Suggesting that sex workers are mentally ill and that they need “help” is based on stereotypical assumptions, and is damaging towards sex workers.

Sex workers receive inadequate services from the OPS when they are judged as drug addicted, HIV infected, or otherwise ill or disabled. These assumptions reinforce negative, harmful, and inaccurate stereotypes about sex workers. These assumptions also promote the idea that it is ok to treat people with perceived or actual disabilities differently than others. Publicly naming sex workers as addicted or sick incites fear and animosity among other members of the community. This harmful stereotyping by the OPS is discrimination on the prohibited ground of disability, and it is illegal.

The Link Between the OPS' Discrimination Towards Sex Workers, and Physical Violence Towards Sex Workers

POWER believes that the various discriminatory beliefs and practices towards sex workers devalues them as human beings, and in some instances, facilitates actual violence against sex workers.

In addition to being denied equal treatment with respect to services offered by OPS on the basis of a clear prohibited ground for discrimination Ottawa-area sex workers also report experiencing physical violence from the police. 16 of the 26 street-based workers that responded to the question about police abuse responded that they had been victims of physical violence by the police. Physical violence at the hands of the police recounted in the POWER report include:

- being attacked by four police officers resulting in visual impairment (Report, p. 54)
- assault resulting in a broken arm (Report, p.54)

¹⁴ Detention Centre Bursting After Sweep, The Ottawa Citizen, November 15, 2008, **attached to this Request as Tab G.**

¹⁵ Online Classified Ads Give Sex Workers Safe Avenue to Work: Criminologist, The Ottawa Citizen, November 5, 2010, **attached to this Request as Tab H.**

- head smashing (Report, p.54)
- pushing causing marks on body (Report, p.55)
- punching resulting in hospitalization (Report, p.55)

POWER is unaware whether these women filed complaints with the Ottawa Police Service as a result of these experiences.

4. The Impacts of Discrimination on Ottawa Sex Workers

The institutional and intersecting discrimination experienced by Ottawa-area sex workers from the OPS serves to perpetuate the social isolation of sex workers and ultimately increases their vulnerability to violence. If sex workers cannot depend on receiving equal treatment with respect to police services, and if they fear mistreatment by the OPS, they are left without the same recourse or protection as other members of the Ottawa community. They are less likely to contact the police if they are the victims of crime, thus compromising their own security, and they are less likely to receive non-discriminatory police services when they encounter the OPS in their community.

Beth, who shares that she was raped in a downtown alley, immediately asked a passing police officer for help. Instead, the police officer called her a “fucking crack whore” and told her to call her own ambulance. Given this denial of services, Beth learned that she had to “take care of herself” (Report, p. 30).

All individuals are guaranteed equal access to public services under the *Ontario Human Rights Code*. In the context of municipal policing, the provision of non-discriminatory services is essential to ensure women’s physical safety and mental health. Thus, the perpetuation of stereotypes that sex workers are less worthy members of society by OPS ultimately endangers the lives of sex workers.

5. Possible Outcomes of an Inquiry Into Sex Workers and the Ottawa Police Service

Whereas litigation typically results in findings of liability, a Commission Inquiry could result in constructive solutions to the discriminatory behaviours identified upon completion of a public inquiry.

Recommendations resulting from a public inquiry could include:

- OPS developing policy directives to end institutional discrimination against sex workers;
- In lieu of over-policing, the City of Ottawa adopting effective harm reduction strategies for sex workers whom they believe are legitimately at risk of harm due to addiction or mental health issues;
- Partnerships with housing agencies and community support agencies to support sex workers and diminish sex workers’ experience of stigmatization;
- OPS engaging with community partners, including POWER and other sex workers, in order to deliver comprehensive training for members of the OPS on systemic discrimination and the stigmatization of sex workers,

with a focus on methods for the OPS to provide its services to sex workers in a manner free from discrimination.

POWER is aware that other policing jurisdictions have services tailored specifically to sex workers, to encourage them to report crime and to acknowledge sex workers' rights to non-discriminatory law enforcement services. A Commission Inquiry could also review the work of other jurisdictions and recommend best practices for the OPS.

CONCLUSION

The status of the criminal laws against sex work in Canada remains unresolved. The Superior Court of Justice decision on the unconstitutionality of these laws is currently under appeal. In the meantime, as the research demonstrates, the Ottawa Police Service appears to be targeting sex workers for differential – and damaging – treatment. If the laws criminalizing sex work do eventually change, the stereotypes and prejudices anchoring these practices may persist.

Regardless of the criminal law framework governing sex work, the *Ontario Human Rights Code* legally obligates the OPS to treat sex workers in a manner free from discrimination on the basis of sex, actual or perceived disabilities, and ethnicity. Instead, POWER's research provides evidence that the OPS is treating sex workers in a manner that reinforces and perpetuates negative stereotypes and prejudices about sex workers as unworthy of dignity and respect on the basis of the prohibited grounds of discrimination outlined above.

We invite the Commission to take an active role in protecting some of our most vulnerable and marginalized community members. An Inquiry could be a first step in healing relations between sex workers and the Ottawa Police Service, and heightening awareness amongst other community members. Eventually, we hope, the need for these types of requests will end.

On behalf of POWER, we thank you for your consideration, and look forward to your response.

Yours truly,

GALLDIN LAW



Karin Galldin and Leslie Robertson