



**Western Sydney Regional Organisation of Councils Ltd**

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1 October, 2015

Mr Alister Henskens  
Chair  
Select Committee on the Regulation of Brothels  
Parliament House  
Macquarie St  
Sydney NSW 2000

Dear Alister,

We take this opportunity to address a number of concerns to Western Sydney Councils as to the future regulatory framework affecting brothels. In summary these are;

- The consent authority for brothels should remain with Local Government.
- The State Government in partnership with Local Government must deal with the issue of illegal brothels, those that operate without planning consent by an effective regime of enforceable laws similar to the Boarding Houses legislation.
- The State Government must also address the issue of on-street prostitution and drug hotspots such as ad-hoc “truckstops” that service logistics and distribution centres.
- Even legal brothels have two major operating issues; the associated criminal activity including human trafficking and workplace health and safety, this would suggest very close collaboration between Local Government, Workcover and Police effected through an MOU or other binding arrangement.
- The need for a mandatory “induction” of sex workers conducted by a third party whereupon a potential sex worker is offered a “way out” (dependent on circumstances) at the completion of the induction.

It is acknowledged that while local government has specific capabilities and obligations to support a new framework to regulate brothels it has limited resources to conduct pro-active and follow-up activities that would be required as part of a new and more effective regime of regulation.

One way of addressing this would be for Councils within a region to share a specialized resource, for example in Western Sydney this could include 10 Councils, this resource would;

- For Legal brothels, plan and conduct a program of compliance checks and inspections, criminal activity intelligence gathering, follow-up to compliance issues etc.
- For illegal brothels, gather and analyse intelligence, planning and co-ordinating joint enforcement operations, developing post-operations reports, manage follow-up activities etc.

Councils would still contribute those specialized officers from the health and planning domains as would Police provide sworn officers for specific and highly co-ordinated activities. The Councils and Police would not be burdened with intelligence gathering and analysis, planning, co-ordination, preparation and follow-up activities that would take up the majority of the time if regulation and its proper enforcement are key objectives.

This model would achieve high levels of efficiency due to specialists conducting the most demanding and time consuming tasks, it would ensure a consistent approach across all LGA's, it would be rigorous in its coverage, it would allow the training of a small group of people with skills in detecting human trafficking.

WSROC would be happy to explore the possibility of entering into a partnership with the State Government to conduct a pilot of these arrangements.

From a personal perspective I take this opportunity to make some observations on a number of issues associated with the Regulation of Brothels. I take particular note of some of the commentary offered by academics attending your inquiry and the attitude of one of your Committee members that would have you believe that there are no problems with the operation of legal brothels, the number of illegal brothels, the issue of human trafficking and the safety of sex workers. My experiences suggest otherwise and I encourage you to dismiss uninformed comment from academics, vested interests and those that do not know any better.

In response to the Korean community's concerns about Korean women sex workers and the possibility that some of them were victims of human trafficking I was able to convince Minister Dominello in 2012 to establish an Inquiry into the Exploitation of Women Through Trafficking. The Inquiry by the Community Relations Commission was somewhat limited and the outcomes of its investigation inconclusive.

What was not inconclusive were the results of a limited intelligence gathering operation conducted by the Burwood Local Area Command at my request as the former Member for Strathfield. Over the course of a few hours one afternoon simply by going through the local paper sex advertisements and following up with some phone calls the Police were able to conclude that for every legal brothel in the Burwood/Ashfield LACs there were four illegal brothels.

During that time I also participated on some joint operations involving Local, State and Federal Government agencies. These activities exposed the difficulties of the current legislation and suggested that the recent changes to legislation affecting Boarding Houses would be an excellent start to the proper regulation of Brothels.

Yours sincerely,

A handwritten signature in blue ink that reads "Charles". The signature is written in a cursive, slightly stylized font.

Charles Casuscelli RFD  
Chief Executive