

Canadian Alliance for Sex Work Law Reform



Submission on Bill C-75:

*An Act to amend the Criminal Code, the Youth Criminal Justice Act and other Acts
and to make consequential amendments to other Acts*

To:

House of Commons Canada, Standing Committee on Justice and Human Rights on Justice

September 3, 2018

The Canadian Alliance for Sex Work Law Reform is a coalition of sex worker and allied organizations across Canada advocating for law reform that respects and upholds the rights and safety of people who sell or trade sex. Our member groups have expertise, analysis and experience regarding the impact of criminal sex work-related prohibitions on the lives and wellbeing of those who sell or trade sex, and it is on these grounds that we submit our response to Bill C-75, *An Act to amend the Criminal Code, the Youth Criminal Justice Act and other Acts and to make consequential amendments to other Acts*.

Our member groups include: Angel's Angels (Hamilton); Action Santé Travesties et Transexuel(le)s du Québec (ASTTeQ) (Montréal); BC Coalition of Experiential Communities (Vancouver); Butterfly Asian and Migrant Sex Workers Network (Toronto); Canadian HIV/AIDS Legal Network (Toronto); Downtown Eastside Sex Workers United Against Violence (SWUAV) (Vancouver); Émissaire (Longueuil); FIRST (Vancouver); HIV Community Link, Shift Program (Calgary); Maggie's Toronto Sex Workers Action Project (Toronto); Maggie's Indigenous Sex Workers Drum Group (Toronto); Migrant Sex Workers Project (Toronto); PEERS (Victoria); Projet Lune (Québec); Prostitutes Involved Empowered Cogent Edmonton (PIECE) (Edmonton); Providing Alternatives, Counselling and Education (PACE) Society (Vancouver); Rézo, projet travailleurs du sexe (Montréal); Safe Harbour Outreach Project (S.H.O.P.) (St John's); Safe Space (London); Sault Ste. Marie Sex Workers' Rights (Sault Ste. Marie); Sex Professionals of Canada (SPOC) (Toronto); Sex Workers Advisory Network of Sudbury (SWANS) (Sudbury); Stella, l'amie de Maimie (Montreal); Stop the Arrests! (Sault Ste. Marie) Strut! (Toronto); Supporting Women's Alternatives Network (SWAN)(Vancouver); Shift (Calgary); West Coast Cooperative of Sex Industry Professionals (WCCSIP) (Vancouver); Sex Workers of Winnipeg Action Coalition (Winnipeg).

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Summary of Recommendations

- Amend Bill C-75 to repeal sections 213(1), 213(1.1) and 213(2); 286.1(1), 286.1(2), 286.1(3), 286.1(4) and 286.1(5); 286.2(1), 286.2(2), 286.2(3), 286.2(4), 286.2(5) and 286.2(6); 286.3(1) and 286.3(2); 286.4; 286.5(1) and 286.5(2);
- Remove the latest amendment to the trafficking in persons provision (s. 279.01(3)) as was first proposed in Bill C-452, then in Bill C-38 and now in Bill C-75, that lowers the evidentiary requirements to prove trafficking;
- Amend Bill C-75 to repeal the *Criminal Code* provisions on bawdy-house, indecent act, immoral theatrical performance, indecent exhibition and vagrancy; and
- Develop prosecutorial guidelines to ensure that cases of alleged HIV non-disclosure are shielded from sexual assault and other criminal prosecutions.

1. In its current form, Bill C-75 fails to address the harms caused by *Criminal Code* prohibitions on sex work-related activities. We recommend that the Bill be amended to repeal sections 213(1), 213(1.1) and 213(2); 286.1(1), 286.1(2), 286.1(3), 286.1(4) and 286.1(5); 286.2(1), 286.2(2), 286.2(3), 286.2(4), 286.2(5) and 286.2(6); 286.3(1) and 286.3(2); 286.4; and 286.5(1) and 286.5(2) for the following reasons:

- a. While Bill C-75 repeals several *Criminal Code* provisions ruled unconstitutional by Canadian courts, numerous other unconstitutional criminal prohibitions remain in the *Criminal Code*. In 2013, the Supreme Court of Canada found that several criminal prostitution laws caused harms that violate sex workers' s. 7 Charter right to security of the person (*Canada (AG) v. Bedford* 2013 SCC 72, or "*Bedford*"). The subsequent *Criminal Code* provisions enacted by the *Protection of Communities and Exploited Persons Act (PCEPA)* replicate these harms (see section 'b' below) and their constitutionality is similarly impugned. In its June 2017 Backgrounder to Bill C-51, *An Act to amend the Criminal Code and the Department of Justice Act and to make consequential amendments to another Act*, the Department of Justice stated that "repealing provisions that are very similar to those found unconstitutional by the courts would help to avoid expensive, time-consuming litigation to achieve the same result and may prevent court delays. It recognizes the Government's responsibility for aligning the law with the requirements of the Charter." We assume this position holds true today.
- b. International and domestic empirical and anecdotal evidence demonstrate the deleterious effect of all criminal sex work prohibitions on the safety and wellbeing of people who sell or trade sex, including provisions that criminalize clients and third parties. UN bodies, courts and human rights organizations, including Amnesty International,¹ the UN Development Programme (UNDP),² Human Rights Watch,³ the Joint UN Programme on HIV/AIDS (UNAIDS),⁴ the World Health Organization (WHO) with the UN Population Fund (UNFPA), UNAIDS and the Global Network of Sex Work Projects,⁵ the Global Commission on HIV and the Law,⁶ the Global Alliance Against Traffic in Women,⁷ the Center for Health and Gender

¹ Amnesty International Policy on state obligations to respect, protect and fulfil the human rights of sex workers. May 2016. <https://www.amnesty.org/en/documents/pol30/4062/2016/en/>

² John Godwin. 2012. *Sex Work and the Law in Asia and the Pacific: Laws, HIV and human rights in the context of sex work*. Bangkok: United Nations Development Programme. <http://www.undp.org/content/dam/undp/library/>

³ Human Rights Watch. 2014. "Canada's prostitution bill a step in the wrong direction." <https://www.hrw.org/news/2014/06/18/canadas-prostitution-bill-step-wrong-direction>

⁴ UNAIDS, *UNAIDS Guidance Note on HIV and Sex Work*, 2012. http://www.unaids.org/sites/default/files/sub_landing/JC2306_UNAIDS-guidance-note-HIV-sex-work_en.pdf

⁵ World Health Organization, UNFPA, UNAIDS, Global Network of Sex Work Projects. December 2012. *Prevention and Treatment of HIV and Other Sexually Transmitted Infections for sex Workers in Low and Middle Income Countries: Recommendations for a Public Health Approach*. http://www.nswp.org/sites/nswp.org/files/WHO%20prevention%20treatment%20HIV%20STI%20sex%20workers_0.pdf

⁶ Global Commission on HIV and the Law (UNDP HIV/AIDS Group). July 2012. *HIV and the Law: Risks, Rights & Health*. <http://www.undp.org/content/undp/en/home/librarypage/hiv-aids/hiv-and-the-law-risks-rights-health.html>

⁷ Global Alliance Against Traffic in Women (GAATW). 2016. *Response to UN Women's consultation on sex work*. <http://www.gaawt.org/events-and-news/68-gaatw-news/857-response-to-un-women-s-consultation-on-sex-work>

Equity (CHANGE),⁸ the UN Special Rapporteur on the Right to Health,⁹ and the Supreme Court of Canada in *Canada (Attorney General) v. Bedford (Bedford)*¹⁰ have affirmed this research and concluded that criminalization of the sex industry has been proven to support exploitation. In particular, the criminalization of sex work leads to violations of sex workers' rights to work, privacy, equality and non-discrimination, life, liberty and security of the person, health, working conditions that are just, favourable, safe and healthy, freedom of expression, freedom of peaceful assembly, freedom of association, freedom from unreasonable search and seizure, freedom from arbitrary detention and imprisonment, and freedom from torture and cruel, inhumane and degrading treatment. **In Canada, the following criminal provisions work discretely and collectively to harm people in the sex trade:**

- i. *Stopping or Impeding Traffic and Communicating for the purpose of offering, providing or obtaining sexual services for consideration (S. 213):*
 - These **provisions cause harm to sex workers by imposing dangerous conditions on and preventing sex workers from taking steps to protect themselves** as described below. It was for this reason that the Supreme Court of Canada (SCC) struck down s. 213(1)(c) in *Bedford*.
 - Current sections under s. 213 produce the same harms identified in *Bedford*.
 - Sex workers most affected by this provision are those who are over-policed and over-surveilled in public space including Indigenous women, homeless women, trans women, women who use drugs, and women living in poverty.
 - These provisions:
 - allow police to exert greater control over the lives of sex workers and create additional antagonism with police, many of whom surveil, harass and detain sex workers and are viewed as a source of stress and oppression and not a source of help for sex workers who occupy public space;
 - prohibit sex workers from communicating with potential and actual clients to establish the terms and conditions of the exchange and consequently to consent to the sexual activity;
 - prohibit sex workers from taking the time to screen prospective clients, which reduces vulnerability to violence; and
 - displace sex workers from familiar areas and support services to isolated and remote areas, which increases vulnerability to violence.
 - These provisions are based on an ideological and moral position that viewing sex workers in public spaces causes social harm and undermines women's equality and that sex workers should therefore be criminalized for occupying public spaces. It **sends the message that**

⁸ CHANGE, Women's Rights Organization Applauds Amnesty International Recommendation to Decriminalize Sex Work, August 11, 2015. http://www.genderhealth.org/media_and_publications/press_releases/P10/

⁹ UN Human Rights Council, Report of the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, Anand Grover, Report on the 14th session, UN General Assembly, agenda item 3, UN Doc. A/HRC/14/20, April 27, 2010. <http://www2.ohchr.org/english/bodies/hrcouncil/docs/14session/A.HRC.14.20.pdf>

¹⁰ *Canada (Attorney General) v. Bedford*, 2013 SCC 72, [2013] 3 S.C.R. 1101 <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/13389/index.do#>

people – especially women – who sell or trade sex are less valuable members of society that do not deserve to work and live in safety and with dignity.

ii. *Obtaining Sexual Services for Consideration (S. 286.1):*

- These provisions render it illegal to purchase sexual services or communicate for that purpose. Prohibiting the purchase of sexual services and communications for such purpose leads to the following impacts, in addition to those noted in s. 213 (above):
 - **clients and sex workers are displaced and isolated** because clients attempt to avoid detection by law enforcement;
 - it becomes **difficult for sex workers to screen clients and negotiate terms in advance** by telephone or internet, because clients use blocked numbers or refuse to explicitly communicate information about themselves due to fear of arrest and prosecution, or before getting into the confined space of a client’s car, because clients hurry or avoid discussion due to fear of police detection and arrest;
 - sex workers and clients avoid discussing parameters of a service such as price and sexual services for fear of surveillance, entrapment and arrest, which may result in misunderstandings and violence;
 - sex workers’ ability and right to communicate about and therefore consent to sexual activity is impeded — a legal and ethical requirement for any sexual engagement, commercial or otherwise;
 - sex workers are unable to establish or work in safe indoor spaces without being in conflict with the law because their workspaces are now sites of this illegal activity and as a result, workplaces are easily surveilled and raided. As a result, sex workers are forced to work in greater secrecy and isolation, and therefore with less safety and increased vulnerability to violence.
- This provision makes no distinction between clients and perpetrators of violence. It presumes all clients are at all times committing acts of violence against women. This moral and ideological premise is not only false, but also harmful as **it trivializes actual violence when it does occur. Consenting to sell or exchange sex does not mean consenting to violence.**
- This framing of all sex work as violence against women renders all cisgender and transgender male sex workers and gender non-binary sex workers invisible.
- Criminalizing the purchase of sexual services sends a message that there is something inherently wrong with sex work; this stigma impacts sex workers’ wellbeing and impedes their willingness to access health and social services.
- Criminalizing the purchase of sexual services isolates all people who sell or exchange sex for goods or money and pushes people away from police protection, community services and government supports. It fuels antagonism with police and stigmatizes communities.

iii. *Material Benefit from Sexual Service (S. 286.2):*

- This provision criminalizes anyone who receives a financial or other material benefit from someone else’s sexual services.
- It is similar to the former s. 212(1)(j) “living on the avails” provision that the SCC struck down for violating sex workers’ right to security of the person, and reproduces the same harm caused by this provision.

- The material benefit provision **prevents sex workers from entering into supportive and informed work relationships with third parties who provide beneficial services such as security, marketing, work spaces and administrative support.**
- This provision imposes an assumptive lens on the lives and relationships of sex workers that frames their relationships as exploitative. This erroneous assumption is generally imposed on all sex workers who work with third parties, and particularly on migrant sex workers, sex workers who use drugs, and Indigenous people who sell or trade sex.
- Significantly, this provision explicitly criminalizes materially benefitting in the context of a “commercial enterprise,” which prohibits all relationships that sex workers require to work in established and organized workspaces (such as escort agencies and massage parlours) with supportive safety infrastructure. Without access to such “commercial enterprises”, the least resourced sex workers are often unable to work indoors, and all sex workers are hindered from developing networks and communities for language, resource, financial, emotional and other support.

We note that as an offence with a maximum sentence of ten years, the material benefit offence is hybridized under Bill C-75. While we support the principle of hybridizing most indictable offences punishable by a maximum penalty of 10 years or less, we find it problematic for the government to limit its response to this harmful and potentially unconstitutional offence to amending the related sentencing provision. If the government is prepared to review and address a single component of the *PCEPA*, it should be prepared to review and address *PCEPA* in its entirety.

iv. Procuring (S. 286.3):

- This provision reproduces the harms of s. 212(1)(j) “living on the avails” that the SCC struck down in *Bedford*.
- It **perpetuates social isolation and increases the risk of violence against and exploitation of sex workers**, who face fewer options for safe workplaces and fewer opportunities to choose among the people they work with and for.
- This provision captures non-exploitative conduct that can provide sex workers with safer working conditions, including drivers, receptionists, bodyguards or other security and prevents sex workers from legally entering into useful and informed working relationships with third parties who are in management positions or who can introduce sex workers to potential clients. Because this provision dictates that law enforcement treat all third parties as exploitative, it isolates sex workers and third parties from police and legal protections, thereby creating conditions for actual exploitation.
- Indigenous and migrant workers are assumed to be exploited. Colleagues, employers, family and community members are mistakenly identified as “procurers” and “traffickers” when performing non-exploitative tasks that provide support and community to other sex workers. People who work in the sex industry often rely on the support of third parties and family members to help organize their income, communicate with clients, offer additional security precautions and/or advertise their services.
- Sex workers themselves frequently act as third parties for other workers. Sex workers who are also third parties are captured under this law when they perform administrative tasks for other workers like organizing a work space in a hotel or other location, providing reception services, finding clients and booking clients. **Sex workers have been charged with third party offences, even in the absence of exploitation, because they work or associate**

with other sex workers, or receive material benefits related to services or resources they provided for other sex workers.

v. *Advertising (S. 286.4):*

- This prohibition makes advertising more difficult for sex workers, which is very important to openly and clearly communicate the terms of their services.
- It is **near to impossible for sex workers to advertise their own services without engaging a third party or enterprise**; website and newspaper advertising are hosted and owned by third parties who are criminalized under this provision.
- The advertising prohibition creates significant barriers to working indoors, which was demonstrated in *Bedford* as safer than working on the street.
- The advertising prohibition prevents sex workers from communicating with clients remotely before meeting them, which facilitates misunderstandings and violence. In addition to s. 286.1 and s. 286.2, this provision prevents sex workers from gathering necessary information from clients required to establish safety measures.
- Sex workers who do not have the means to work independently can no longer use a third party to advertise their services. As a result, sex workers with the most limited resources are the people most financially affected by this prohibition.
- The advertising prohibition renders illegal the virtual “lounges” designated for sex workers and support organizations to share advice on workplace safety and conditions.

vi. *Immunity from prosecution (S. 286.5):*

- S. 286.5 provides immunity from prosecution for sex workers who advertise their own sexual services, and for sex workers who receive a material benefit from the sale of their own sexual services, despite the fact that doing so is still a crime.
- **The belief that exempting sex workers from criminal penalties is sufficient to protect sex workers from violence and exploitation is simplistic and naïve.**
- Sex workers cannot legally establish safe indoor workspaces, employ health and safety measures or access labour protections when they work, since the *Criminal Code* defines the exchange and remuneration of their services, as well as related communication and management, as illegal activities.
- Sex workers cannot employ safety measures when they, their clients or third parties are avoiding detection by police.
- This avoidance is not limited to fear of arrest or prosecution, but extends to avoiding regular police presence in their lives in a context of criminalization.
- The criminalization of sex work, and the resulting avoidance of law enforcement by sex workers and clients, prevents sex workers from working together or with other people rather than in isolation.
- Not only does sex workers’ *de facto* involvement in a criminal activity severely undermine their safety, it has numerous other deleterious effects on their rights and living conditions, ranging from the inability to access numerous workplace benefits, to the ever-present risks of eviction (particularly if they work from home), termination of employment in other sectors or loss of parental rights, to pernicious stigma and discrimination in their various interactions with law enforcement, health care and social service providers and others.
- It is not possible for sex workers to safely sell sex or exchange their services in a context where the purchase of sexual services is criminalized.

- c. Bill C-75 repeals the offences of anal intercourse and abortion, which targeted sexual or reproductive activities and autonomy and disproportionately impacted LGBTQ2S+ communities and women, respectively. Prohibitions on sex work activities similarly undermine the right to self-determination and security of the person, disproportionately impact women, LGBTQ2S+ peoples, Indigenous and migrant communities, and other marginalized groups, and should be removed. Bill C-75 must respond to the fact that the criminal provisions related to sex work continue to marginalize these communities by placing them in direct conflict with the law and with law enforcement. Equipping law enforcement with additional tools to surveil, detain, arrest and deport marginalized communities serves to isolate these communities and renders them targets for predators who are encouraged to operate with impunity.
- d. Bill C-75 proposes to attend to the discriminatory treatment and over-representation of Indigenous and marginalized or vulnerable peoples in the criminal justice system. Sex workers (and their personal and labour relations) reflect the diversity and inequality of social locations in Canadian society and for many, sex work prohibitions represent a criminalization of their poverty and perpetuate the overpolicing of Indigenous and Black people and their overrepresentation in courts and prisons. Sex work laws continue to be employed and enforced through racist and colonial lenses and practices: Indigenous women are over-policed and under-protected; Asian and migrant workers are explicitly targeted for investigation and deported; and young Black men who happen to be boyfriends or associates of sex workers are labelled and prosecuted as “pimps.” Continued criminalization of communicating for selling sexual services places police squarely in the lives of sex workers who occupy public space and contributes to already existing antagonism with police, who are neither seen as a resource nor a source of safety. Third party laws around “material benefit”, “procuring”, and “advertising” capture these over-policed communities and fail to recognize the complexity and intricacy of the relationships that sex workers have with community members, as well as capture sex workers themselves who perform third party tasks.
- e. The *PCEPA*’s conceptualization of sex work as violence against women is as harmful to sex workers as its specific provisions. The *PCEPA* defines sex work as a form of inherent exploitation and frames all sex workers as automatic victims and all clients and third parties as exploitative criminals. This moral and ideological premise is not only false but dangerous, as it trivializes actual violence when it does occur. When sex work is seen as a form of violence, abuse of sex workers is expected and condoned. Further, the message that there is something inherently wrong with sex work stigmatizes those selling or trading sex and leads to social discrimination and exclusion.
- f. Indigenous women, two-spirit people and youth, people who are im/migrants (particularly racialized women) and trans and non-binary people (especially trans women) face targeted violence, stigmatization and overpolicing under the *PCEPA*. Predators are aware that in a criminalized regime, sex workers actively avoid police for fear of detection, apprehension, and in the case of migrant women, deportation.

- g. Decriminalization is a first necessary step in realizing sex workers' rights and safety, as it eliminates the barriers and dangers caused by working in a criminalized context.
- 2. Human Trafficking.** We continue to reject the latest amendment to the trafficking in persons provision (s. 279.01(3)) as was first proposed in Bill C-452, then in Bill C-38 and now in Bill C-75.¹¹ This proposal lowers the evidentiary requirements to prove trafficking. Under this Bill, evidence that a person living with or habitually in the company of a person who is “exploited” is — in the absence of contrary evidence — proof that the person is trafficking them. While the underlying intention of implementing this presumption may be to consider the needs of victims of human trafficking, as with the criminal prohibitions against third parties discussed above, sex workers will be further alienated from police and social services for fear of implicating their colleagues and loved ones as traffickers. Invariably, sex workers will be forced to work in less visible spaces to avoid being caught in the vast net of this law, creating conditions for greater exploitation and risk for sex workers. This does not increase public safety.
- 3. We are concerned that elements of Bill C-75 will impede access to justice and fair treatment for people in and associated with the sex trade who come in conflict with the law for any reason and who are further marginalized by their race, Indigeneity, immigration status, socio-economic class, gender, substance use or other structural or individual oppressions:**
- a. Increasing the maximum sentence for summary convictions to two years less a day risks the continued over-incarceration of marginalized peoples both through the increased maximum sentence itself and by severely restricting access to affordable paralegal and agent representations (who are generally only permitted to represent defendants if the maximum penalty is six months or less).
 - b. Permitting the admission of “routine police evidence” by writing risks undermining due process and trial fairness. Cross-examination shines a light on potential cases of police impropriety or abuse, and is especially vital to protect the rights of Indigenous and Black defendants. Requiring the defence to seek leave to cross-examine is a barrier to just process¹².
- 4. Bill C-75 also fails to repeal multiple *Criminal Code* provisions traditionally used to condemn individuals and communities on the basis of their sexual activities, relationships and identities, including people who sell or trade sex.** Prime Minister Trudeau’s 2017 apology to LGBTQ2S+ people for laws that “bolstered and emboldened those who wanted to attack non-conforming sexual desire” should be buttressed by the repeal of criminal offences that have historically been used to unjustly target non-conforming sexual expressions. The *Criminal Code* provisions on bawdy-house, indecent act, immoral theatrical performance, indecent exhibition and vagrancy should also be repealed in Bill C-75. In this regard, we fully endorse and refer the Committee to the submission on

¹¹ Canadian Alliance for Sex Work Law Reform. Brief to the Standing Committee on Justice and Human Rights on Human Trafficking. Submitted May 7, 2018.

¹² Criminal Lawyers’ Association. April, 18, 2018. *Position Paper Bill C-75*. <https://s3.amazonaws.com/tld-documents.lnassets.com/0006000/6561/lawyer%27spositionpaper.pdf>

Bill C-75 made to this Committee on Wednesday July 4, 2018 by Patrizia Gentile, Tom Hooper, Gary Kinsman and Steven Maynard.

- 5. Criminal laws should not be employed to prosecute people living with HIV for HIV non-disclosure.** While there is no specific reference to HIV in the *Criminal Code*, various sections, including sexual assault (ss. 271 to 273) have been used to prosecute people in cases of alleged HIV non-disclosure. Community, human rights and legal organizations have drawn attention to the misuse of the criminal law to target those living with HIV for cases of alleged HIV non-disclosure. HIV criminalization perpetuates stigma and counters effective public health and education strategies. Bill C-75 should be amended to limit the use of *Criminal Code* provisions, including the sexual assault provisions, against people living with HIV, and include plans for the creation of prosecutorial guidelines that will ensure people living with HIV are not unjustly prosecuted for HIV non-disclosure in the context of consensual sex¹³.
- 6. We support codifying the principle of restraint for bail and release conditions, including attending to the circumstances of Indigenous and vulnerable persons who are overrepresented in the criminal justice system and are disadvantaged in obtaining interim release.** The harmful consequences of bail and release conditions imposed on marginalized individuals, particularly individuals living in poverty and in situations of homelessness, have been well documented over the years.¹⁴ Release conditions often violate the rights to life and security of sex workers who live and work in poverty and/or homelessness by prohibiting them from accessing vital resources such as health services and food banks, in addition to exacerbating their poverty and lack of resources by preventing them from accessing the areas where they work. As the amendments proposed in Bill C-75 recognize, although these conditions are ordered with the objective of “preventing recidivism,” they actually lead to increased criminalization by placing individuals at risk of further criminal charges for breach of conditions resulting from accessing their work places and communities, in addition to vital resources. In this regard, we fully endorse and refer the Committee to the submission on Bill C-75 submitted to this Committee by Dr. Marie-Ève Sylvestre, *Vers une véritable mise en œuvre du droit à un cautionnement raisonnable*.

¹³ Canadian HIV/AIDS Legal Network. 2018. *Respect, Protect, Fulfill: A Human Rights Response to HIV*. <http://www.aidslaw.ca/site/respect-protect-fulfill-a-human-rights-response-to-hiv/?lang=en>

¹⁴ Sylvestre, M.-E., Duchesne Blondin, A., Bellot, C., Fortin V., and N. Blomley. March 2018. *Les conditions géographiques de mise en liberté et de probation et leur impact sur les personnes marginalisées à Montréal*. <https://profilages.info/2018/04/09/rapport-les-personnes-marginalisees-a-montreal-prises-dans-un-cycle-infernal-de-bris-de-conditions/>