



19. 12. 2003

**PROSTITUTION REFORM ACT SUBCOMMITTEE  
8 DECEMBER 2003**

**A meeting of the Prostitution Reform Act Subcommittee  
was held on Monday 8 December 2003 at 9.15am**

**PRESENT:** Councillor Sue Wells (Chairperson),  
Councillors Helen Broughton, Alister James, Lesley Keast and  
Ingrid Stonhill.

The Committee reports that:

**PART A - MATTERS REQUIRING A COUNCIL DECISION**

**1. REPORT OF THE PROSTITUTION REFORM ACT SUBCOMMITTEE**

<b>Officer responsible</b> Research and Policy Development Manager	<b>Author</b> Terence Moody, DDI 941-8834
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The purpose of this report is twofold:

1. To advise the Council on activities and consultation undertaken by the Prostitution Reform Act Subcommittee; and
2. To seek the Council's agreement to commence the process to introduce bylaws regulating the location of brothels and signage in accordance with the provisions of the Prostitution Reform Act 2003.

**INTRODUCTION**

The Prostitution Reform Act 2003 came into force on 28 June 2003, except for Part 3 Operator certificates and section 49 relating to the revocation of the Massage Parlours Act and regulations that come into effect six months after that date (ie 28 December 2003).

The provisions of the Prostitution Reform Act were contained in the report of the Regulatory and Consents Committee to the Council Meeting of 24 July 2003 and are briefly summarised as follows;

*The Act's stated purpose is:*

*"...to decriminalise prostitution (while not endorsing or morally sanctioning prostitution or its use) and to create a framework that—*

- (a) *safeguards the human rights of sex workers and protects them from exploitation;*
- (b) *promotes the welfare and occupational health and safety of sex workers;*
- (c) *is conducive to public health;*
- (d) *prohibits the use in prostitution of persons under 18 years of age;*
- (e) *implements certain other related reforms."*

*The new provisions in the Act relating to prostitution can be summarised as follows:*

- (i) *The operators of business of prostitution must adopt and promote safer sex practices;*
- (ii) *Sex workers and clients must adopt safer sex practices;*
- (iii) *The Health and Safety in Employment Act 1992 applies to a sex worker while providing commercial sexual services;*
- (iv) *There are protections for sex workers in relation to inducing or compelling persons to provide commercial sexual services or earnings from prostitution;*
- (v) *There is a right for a person to refuse to provide commercial sexual services;*
- (vi) *There are prohibitions on the use in prostitution of persons under 18 years;*

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- (vii) *Advertisements for commercial sexual services cannot be broadcast on radio or television, or published in a newspaper (except in the classifieds) or in public cinemas;*
- (viii) *There are powers of entry and inspection by Crown Public Health inspectors for compliance with health and safety standards;*
- (ix) *The Act establishes a Prostitution Law Review Committee to review, between 2006 and 2008, the operation of the Act and to consider whether any amendments to the law are necessary or desirable.*

*Parliament has adopted a limited licensing regime in the Act to restrict who may operate a prostitution business. It appears that the intention of this regime is to ensure that those who own brothels and manage or control sex workers are suitable for the role, and to help keep organised crime groups, and other criminals out of the commercial sex industry. The Act requires that any person who owns, operates, controls or manages a business of prostitution must hold a certificate from the District Court.*

*The Act sets out grounds upon which a person would be disqualified from holding a certificate and these include convictions for matters such as participation in an organised criminal group, sexual crimes, murder, manslaughter, assault, abduction, robbery, extortion, burglary, money laundering, and arms and drug offences.*

*The District Court has the power to order a waiver of the disqualification notwithstanding previous convictions and grant a certificate in particular circumstances. Operators are required to produce certificates on request to the Police. This operator licensing regime does not commence until December 2003.*

*The Act also provides that a sex worker who works at a "small owner-operated brothel" is not an operator of a business of prostitution and so does not need to have an operator's licence. A "small owner-operator brothel" is defined in the Act as meaning a brothel-*

- (a) *at which not more than four sex workers work; and*
- (b) *where each of those sex workers retains control over his or her individual earnings from prostitution carried out at the brothel.*

*The Act is drawing a distinction between sex workers working by themselves or in a collective with other workers (where none of those workers has control over the other workers) by them not being required to have an operator's certificate; and brothels where the sex workers are controlled or managed by another person, and where the sex workers do not retain their individual earnings. In that latter situation the owner, operator or manager of the brothel must hold an operator's certificate.*

*As noted above, the powers of entry and inspection in relation to health and safety matters are the responsibility of Crown Public Health inspectors and the District Court is responsible for the administration of the operator's certificate regime. With regard to territorial authorities, the Act contains two new bylaw-making powers and new criteria to be used with resource consents in relation to businesses of prostitution. The new bylaw-making powers are for regulating location of brothels and controlling signage advertising commercial sexual services.*

- (a) *Regulating location of brothels*

*The Act provides that the Council may make bylaws "...for the purpose of regulating the location of brothels."*

*It is well-established law that with bylaw making powers in statutes the use of the word "regulating" means that the Council can prohibit an activity in part of its district, but not in the whole of its district. The Act does not contain any criteria to guide the Council in exercising this bylaw-making power.*

*I note that the power to make a bylaw is in relation to "brothels" and in my opinion the bylaw making power applies to all brothels, including small owner-operated brothels. A council, in making a bylaw, could write the bylaw so that it did not apply to small owner-operated brothels if it wished to do so.*

*The legal process for making bylaws involves the use of the special consultative procedure so there is an opportunity for public submission as to the content of any proposed bylaw. With bylaws there is not the concept of existing use rights that there is in the resource management area so a bylaw can apply to brothels existing before the bylaw came into force.*

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(b) *Signage Bylaws*

*The Act also provides that the Council may make bylaws that "...prohibit or regulate signage that is in, or is visible from, a public place, and that advertises commercial sexual services."*

*The Council can only make such bylaws if the Council is satisfied-*

*"...that the bylaw is necessary to prevent the public display of signage that-*

(a) *is likely to cause a nuisance or serious offence to ordinary members of the public using the area; or*

(b) *is incompatible with the existing character or use of that area."*

*Such bylaws can prohibit or regulate signage in any terms, including by imposing restrictions on the content, form or amount of signage on display. City Plan rules already place restriction on advertising signs generally and if the Council was to make a bylaw under the Act, the bylaw would need to link with the City Plan rules.*

(c) *Resource consents*

*The Act also provides that when considering an application for a resource consent for a land use relating to a business of prostitution, the Council must have regard to whether the business of prostitution-*

(a) *is likely to cause a nuisance or serious offence to ordinary members of the public using the area in which the land is situated; or*

(b) *is incompatible with the existing character or use of the area in which the land is situated."*

The Council resolved that a Prostitution Reform Act Subcommittee be appointed to consider the matters raised by the Act and to report back via the Regulatory and Consents Committee to the Council with recommendations regarding the Act.

The Subcommittee comprised Councillors Helen Broughton, Alister James, Lesley Keast, Ingrid Stonhill and Sue Wells.

**THE CONSULTATION PROCESS**

The Subcommittee undertook a process of both stakeholder and public consultation in addition to researching the current rules under the Resource Management Act 1991 and the Proposed City Plan.

**Stakeholder Consultation**

The aim of this phase was to provide a "snapshot" of the prostitution industry as it currently operates, to gauge stakeholder perceptions of the Act, and to seek ideas on how to best communicate with specific stakeholders.

The NZ Police discussion covered the three broad groups within the industry, including massage parlours, escorts and street workers. The Police advised that they maintained a register of private escorts. Registration was necessary to the placement of newspaper advertisements. There are approximately 800 persons in the city on that register. The Police estimated there were between 50-100 street workers in the central city. Police resourcing and monitoring was discussed. It was noted that there was limited nuisance apparent at this time.

The meeting with youth and health workers raised a concern that over-regulation could result in driving the activity underground; there were issues around health inspections; there was to be a focus on health and harm minimisation, and there could be youth projects resource issues.

The massage parlour owners and operators meeting raised the following matters. There were 14 licensed parlours, 11 within the CBD, two in small business areas and one in a residential zone. It was considered that most would remain in the CBD but some would like to expand. Some would want additional signage. It was advised there was a current industry downturn and uncertainty about the Act.

The meeting with the Prostitutes Collective, escorts and social workers discussed the following matters. Escorts were working the suburbs, either from their own home or rented motel or flat, or outcall, and traded mostly on their own. The exact number was unknown but they were a significant part of the industry. It was important that they be discreet so they advertise in newspapers or on the

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Internet. It was considered that public signage should be kept "clean" and deal with proven nuisances. This group considered that you could not legislate for morality. Street workers chose not to work in parlours, this group also included the transgender and gay population. There was a strong focus on Latimer Square and Manchester Street and in their opinion workers were unlikely to shift from these areas. It was considered the least safe way to work.

The Subcommittee did not manage to speak directly with any street workers to obtain their views on the matter.

An informal meeting was held by the previous Director of Policy with the Policy Development Manager, Christchurch Police, who advised that, at that time (September 2003) no formal consideration had been given to the Act at a national policy level. It was indicated that the Police would not be informed about applications for operator certificates, nor have they any right to a list of licensed operators, nor would they be able to pass on such information. It was advised that the Council likewise would have no access to the Court record of who has a licence to operate a business of prostitution. The view was expressed that street prostitution could not be stopped by rules and policing activity and other strategies were needed to try and minimise it. The Police were most unlikely to be interested in trying to enforce any bylaws the Council might make requiring street prostitutes to be registered or to only solicit in specified areas. In all other offence areas of the Act the Police would follow up on complaints.

**Public Consultation**

The prostitution issues questionnaire was released for public consultation on 8 October 2003 and was distributed extensively across the city through City Scene, the Council's "Have Your Say" website, and newspaper advertisements. The consultation period ran through to 13 November 2003. The consultation form contained a number of questions and provision for further comments.

Some 1,500 submitters<sup>1</sup>, either by completing the questionnaire form or by writing, responded to the Council and 107 submitters sought to be heard by the Subcommittee. The Prostitution Reform Act Subcommittee met on 1, 2 and 3 December 2003 to consider all submissions and hear the 52 submitters who attended the hearing.

The following tables summarise the numbers of responses to each of the questions asked in consultation process.

**Location of Brothels**

Question	Location Suggested	% of Responses	No. of Responses
Should brothels be allowed only in a certain part or parts of Christchurch?	Central Business District/or within the four avenues	60.9	1040
If so, which part or parts of Christchurch do you suggest?	Other Industrial or Commercial zones (not residential)	16.9	289
	Nowhere	6.0	102
	Anywhere	2.9	50
	Rural eg McLeans ls	1.0	18
	Outer or outside city eg Lyttelton	0.8	13
	Residential	0.3	5
	Other	11.2	191

The submissions were strongly against brothels being located in residential areas and many were opposed to such businesses being close to schools, places of worship, or any places where children, in particular, could be exposed to such activities. There were also comments made in regard to any brothels having street level openings wherever they may be situated.

<sup>1</sup> Submissions which contained a petition, multiple signatories or which represented numbers of people were counted as a single submission.

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While the preferred location was the CBD this was seen as requiring further restrictions with a suggested distance from a large range of premises seen to be sensitive. These included the view that a distance of 250 metres from schools, places of worship, and other public places should be set down for brothels to be established. Some suggested the Council should define a "red light" area within the CBD on the grounds that this would enable people to avoid it. Others considered this would draw attention to the industry and it could appear that the Council was promoting such activities.

**Brothel Signage in CBD**

Question	Type of signage	% of Responses	No. of Responses
<b>What advertising/signage would you find acceptable outside a brothel in the CBD?</b>	Very discreet/discreet signage only (not explicit pictures or words), or name only	<b>71.2</b>	<b>961</b>
	No advertising/signage	<b>25.4</b>	<b>342</b>
	Same as any other business	<b>3.4</b>	<b>46</b>

Only a small proportion of respondents considered that signage for brothels should be similar to that permitted for other businesses. The large majority supported discreet advertising with requirements that prohibited pictorial images, neon lighting, flashing lights or similar, and a ban on having lists of available services in the public place. A quarter suggested there should be no signage at all. Those accepting that some signage could be permitted considered it should be "G" rated or "family friendly" to the extent that children would not be affected, nor parents having to be placed in the position of having to explain such matters.

**Suburban Brothel Signage**

Question	Type of signage	% of Responses	No. of Responses
<b>What advertising/signage would you find acceptable outside a suburban brothel?</b>	Very discreet/discreet signage only (not explicit pictures or words), or name only	<b>30.1</b>	<b>444</b>
	No advertising/signage	<b>67.9</b>	<b>1001</b>
	Same as any other business	<b>2.0</b>	<b>29</b>

In the case of suburban brothels the majority suggested there be no signage at with just under a third willing to accept very discreet signage. In general there was no support for suburban brothels in any case.

**Forms of Signage that Cause Concerns**

Question	Type of signage	% of Responses	No. of Responses
<b>Are there other forms of signage, relating to prostitution, that would raise concern?</b>	Sexually explicit, nudity, prominent, graphic pictures, neon signs	<b>62.4</b>	<b>797</b>
	Any signage	<b>22.3</b>	<b>285</b>
	Demmeaning/bad taste	<b>13.1</b>	<b>168</b>
	None	<b>2.2</b>	<b>28</b>

This question raised a considerable amount of concern about signage, not necessarily associated with brothels but with other activities people saw as promoting sexual activities, or at least where sexual images appeared to be used for commercial purposes. Although this matter is somewhat outside the ambit of the Act's provisions it is discussed further below.

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**Advertising on Home Occupation Brothels**

Question	Type of signage	% of Responses	No. of Responses
<b>Should owners of home occupation brothels be allowed to have advertising outside their premises? If so, should there be restrictions on the content of the advertising?</b>	No advertising at all.	<b>79.9</b>	<b>1024</b>
	Yes, discreet	<b>18.5</b>	<b>237</b>
	Yes, no restriction	<b>1.6</b>	<b>21</b>

The submissions demonstrated an overwhelming consensus that all forms of signage or advertising should be strictly prohibited from home "brothels". Those that recommended discreet signage to be permissible suggested the content to be non-conspicuous and limited in size. The only reason for allowing signage at a home "brothel" was to prevent clients mistakenly entering the wrong property.

**Other Issues Raised**

An issue which is not referred to in the Act but arose during the consultations is the activity of sex workers soliciting on footpaths. The Act contains no bylaw-making powers in regard to this activity, but territorial authorities have had for many years powers to control activities on public roads (which include footpaths) and those powers continue under the Local Government Act 2002.

At the present time, the Council's Public Places and Signs Bylaw 1991 provides: "No person shall sell or hire, or expose for sale or hire, any goods or services on any road without a licence issued by the Council and only in compliance with conditions imposed from that licence".

Given that soliciting had been illegal this is not an area the Council has been previously involved with. Although from time to time a limited number of complaints had been received regarding this activity, largely about associated problems of disposal of condoms and other material, but also matters covered by the Summary Offences Act which is administered by the Police, it was not an issue the Council wished to deal with. It is arguable that now that soliciting has been decriminalised, the activity of sex workers on footpaths and in other public places falls within that provision of the Public Places and Signs Bylaw 1991, in that sex workers are offering services for sale. Consideration will need to be given to whether, and how, the Public Places and Signs Bylaw is to apply to sex workers soliciting on the footpath.

**DISCUSSION**

Section 155 of the Local Government Act 2002 requires the Council, before commencing the process for making a bylaw, to determine whether that is the most appropriate way of addressing the perceived problems. Sections 77 and 155 of that Act require an assessment of all practicable options to address the identified problems.

The consultation process resulted in a wide range of concerns being expressed by members of the public relating to the provision of commercial sexual services and the establishment of brothels, particularly in relation to the perceived nuisance effects, and their associated signage and their perceived offensiveness.

The Subcommittee has identified a number of concerns regarding the perceived effects that the Act is likely to create if brothels and their associated signage is not controlled in some way. There were a limited number of substantive matters caused by existing "massage parlours" although the matter of signs for other matters related, in the minds of submitters, with sexual themes caused some concern. In two cases premises alleged to be operating as "brothels" in residential areas, one in cross-leased premises, were of concern to nearby residents. A substantial number of submitters expressed concern on the possible effects on children of exposure to such premises, particularly if these were permitted to operate close to places where children regularly went.

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In summary, the Subcommittee has found that there are several perceived problems which need to be addressed and considered that what needed to be achieved was the maintenance of Christchurch as a "family friendly city". They are:

- the likelihood of explicit and offensive signage developing
- the nuisance effects of brothels
- not creating a "red light district" in the city
- keeping brothels away from largely residential areas

The Subcommittee has identified a number of possible options for addressing these perceived problems. They are:

### 1. **Do Nothing**

This approach was considered as possibly leading to an increase in the setting up of brothels widely throughout the city with few constraints on locations that may be sensitive to members of the public. It should be noted that no provisions currently exist in the City Plan related specifically to activities associated with the prostitution industry. Advice was provided that under the City Plan such activities could be set up as of right in B1, B2, B3, B3B, B4, B5, Central City, Central City Edge, Cultural or Special Purpose zones. It was considered likely that this approach would be subject to public complaints if brothels were set up in inappropriate places eg close to schools and/or concentrating in one suburban retail centre. While adverse environmental effects could possibly be controlled through provisions of the City Plan those provisions would not catch the social effects, and possibly economic effects, on the community. Should a resource consent be required for a land use relating to the business of prostitution the following matters must be taken into account, in considering whether the business of prostitution:

- (a) is likely to cause a nuisance or serious offence to ordinary members of the public using the area; or*
- (b) is incompatible with the existing character or use of the area in which the land is situated."*

Resource consents would only be triggered if the use were not permitted in the particular zone. There are provisions relating to home-based employment and occupation with requirements to allow low-key commercial activities, which could apply, to those persons operating alone in residential areas. There are restrictions on the hours of operation, which should remove nuisance conditions, and rules on signage are relatively strict at present.

Given the considerable concern expressed about signage, some associated with the possibility that brothels may increase their activities in this regard, and in more explicit detail, it was considered that not using the powers provided in the Act was not a sensible option. Submitters clearly expressed their views that such signage was likely to cause a nuisance or serious offence to ordinary members of the public. It was not considered that the Council could rely on the sex industry to self-regulate in these matters.

### 2. **Variations to the City Plan**

The Council could set rules in its City Plan and establish a new regulatory regime to administer the issuing of resource consents. This could involve high costs in the preparation of changes to the City Plan and in the cost to the Council and applicants for administering resource consents. Such plan changes would be a lengthy process, and resource intensive, and the time taken would likely be longer than for the making of a bylaw.

A further problem would be that such controls would not be retrospective in regard to a number of possible activities.

### 3. **Making of Bylaws**

The Act gives the Council powers to regulate the location of brothels and signage advertising commercial sexual services through bylaws.

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**Location**

In considering the matter of location it is clear that the majority of submitters did not consider suburban locations, whether residential or not, as suitable for Christchurch as they would be considered to be objectionable to ordinary members of the public. There was not a similar level of concern about situations of single owner-operators working from home provided suitable signage rules applied. Some submitters suggested that brothels should only be permitted in industrial areas but the Subcommittee considered there were a number of issues that precluded such a proposal. The first was that many industrial areas were close to residential areas and that there could be safety issues involved. Similarly the matter of requiring a 250 metre separation from schools, places of worship, and other significant public gathering places was considered unworkable in terms of regulation rather than prohibition.

A map prepared of the central city, which contains the large proportion of currently licensed massage parlours, showed that none would comply with such a criteria. The advantage of control of location through a bylaw also means that the provisions would apply retrospectively to premises that had been developed prior to the bylaw enactment. It was considered that the harm minimisation of the Act could be more appropriately obtained through such means with brothels with more than one person employed or operating from the premises, whether under an operator certificate or not, requiring to be in the designated area of the central city as set out on the attached plan. It was considered this was the most appropriate means of control for the purposes of the Council to meet, to some degree, the matters raised by submitters at this time. Providing the bylaw provisions are justified and clearly expressed, this approach should be relatively easy to administer, although it could be somewhat costly in its initial stages. The proposed area contains the majority of current licensed massage parlours but providing a wider area as suggested could possibly avoid the concentration that may lead to a perception of a "red light" district. The permitted locations would not permit brothels other than in buildings and no mobile brothels would be permitted. A legal opinion has been obtained that the provision of private "lap dancing" could constitute a "sexual act" for the purpose of the definition of commercial sexual services and therefore premises in which such activities occur may be defined as brothels.

**Signage**

In the case of signage the Act clearly states some criteria that the Council may take into account in providing for control. These state that the Council may make bylaws that *"...prohibit or regulate signage that is in, or is visible from, a public place, and that advertises commercial sexual services"*. The Council can only make such bylaws if the Council is satisfied:

*"...that the bylaw is necessary to prevent the public display of signage that-*

- (a) is likely to cause a nuisance or serious offence to ordinary members of the public using the area; or*
- (b) is incompatible with the existing character or use of that area."*

It was considered that in view of the considerable amount of serious offence caused to ordinary members of the public by some signage already present in the community, sufficient justification existed for limiting the content and size of such signage associated with brothels or other commercial sexual services.

Submitters raised the perceived problem of leaflets or flyers advertising commercial sexual services. The view was expressed that this means of advertising may become more prevalent in the future. A legal opinion states that such advertising, however, is not caught by the specific provisions of the Act, but could be caught by the provisions of the Films, Videos and Publications Classification Act 1993. The Police enforce these latter provisions.

The making of bylaws is subject to the special consultative procedure under the Local Government Act but bylaws are likely to be put into place more quickly than any other option. This option is the favoured approach in this case.



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**OPTIONS ANALYSIS**

The abovementioned options were assessed in terms of the following criteria, as required by section 77 of the Local Government Act 2002:

1. The benefits and costs of each strategy in terms of the present and future social, economic, environmental and cultural wellbeing of Christchurch City; and
2. The extent to which community outcomes would be promoted or achieved in an integrated and efficient manner by each strategy; and
3. The impact of each strategy on Christchurch City's capacity to meet present and future needs in relation to its statutory responsibilities; and
4. Any other matters relevant to Christchurch City.

The analysis of practicable options has indicated that the development of a bylaw is likely to be the most effective single mechanism to manage the perceived problems.

The full report in this regard is available upon request. Officers consider that there is sufficient information for the Council to determine that a bylaw is the most appropriate manner of addressing the perceived problems.

**OTHER MATTERS OUTSIDE THE PROVISIONS OF THE ACT**

There are a number of matters raised during the submission process that while related to the Act, are not caught by the Act. The most pressing is the matter of prostitution in streets or public places. It requires further consideration as to how the perceived nuisances may be addressed. The role of the Police in dealing with matters, which are still contained in the Summary Offences Act, requires some clarification, as does their proposals for dealing with offences under the Prostitution Reform Act 2002 in relation to matters proposed to be covered by bylaws.

**CONCLUSIONS**

The Subcommittee considers that there are perceived problems relating to the location of brothels and their associated signage which need to be addressed. It considers that the most appropriate way of addressing these problems is by utilising the bylaw-making powers given in sections 12 and 14 of the Prostitution Reform Act 2003.

The Subcommittee suggests that a bylaw be introduced, through the special consultative procedure contained in the Local Government Act 2002, with the aim of ensuring that brothels, either with an operator certificate or with more than one person operating, can only operate legitimately within that part of the central city as defined on the attached map subject to certain controls on signage.

These bylaws will apply to all brothels, even those which have been in existence prior to the final adoption of the bylaws.

- Recommendation:**
1. That the Council commence the process of introducing a bylaw regulating the location of brothels in Christchurch in accordance with the provisions set out in the above report of the Subcommittee.
  2. That the Council commence the process of introducing a bylaw to control signage by prohibiting signage in the area defined in the central city in which brothels are permitted that is in or visible from a public place unless it complies with the following requirements:

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- (i) The sign does not exceed 1 metre x 0.3 metres in size (or other dimensions, but of equivalent surface area), and identifies only the name of the business.
  - (ii) A clearly visible street number must be displayed.
  - (iii) There is only one sign per premises.
  - (iv) There are no flashing lights visible from outside the premises.
  - (v) There are no pictorial images included on the sign.
  - (vi) There are no sandwich board advertisements permitted.
  - (vii) No signs will be permitted in any other areas of the city.
3. That the Council agree that the Prostitution Reform Act Subcommittee investigate the matter of developing a liaison group with the Council comprising the Police, Community and Public Health, Child Youth and Family, and the Safer Community Council to examine means of further controlling the perceived problems arising from street prostitution.
4. That the Council approve the following process and timetable for developing the bylaw and for reporting back on the proposals for a liaison group referred to above, through the Prostitution Reform Act Subcommittee:
- (a) Draft bylaw considered by the Prostitution Reform Act Subcommittee early February 2004.
  - (b) Draft bylaw adopted by the Council at its meeting on 26 February 2004.
  - (c) Draft bylaw open for consultation March to mid April 2004.
  - (d) Submissions on draft bylaw heard by the Prostitution Reform Act Subcommittee 28/29/30 April 2004.
  - (e) Prostitution Reform Act Subcommittee to report directly to the Council at its meeting on 27 May 2004.

The meeting concluded at 12.30pm

**CONSIDERED THIS 19TH DAY OF DECEMBER 2003**

**MAYOR**