



May 14, 2020

The Honourable Bill Morneau, Minister of Finance, [Bill.Morneau@parl.gc.ca](mailto:Bill.Morneau@parl.gc.ca)

The Honourable Maryam Monsef, Minister of Women and Gender Equality and Rural Economic Development, [Maryam.Monsef@parl.gc.ca](mailto:Maryam.Monsef@parl.gc.ca)

The Honourable Jean-Yves Duclos, President of the Treasury Board, [Jean-Yves.Duclos@parl.gc.ca](mailto:Jean-Yves.Duclos@parl.gc.ca)

The Honourable Marco Mendicino, Minister of Immigration, Refugees and Citizenship, [Marco.Mendicino@parl.gc.ca](mailto:Marco.Mendicino@parl.gc.ca)

The Honourable Ahmed Hussen, Minister of Families, Children and Social Development, [Ahmed.Hussen@parl.gc.ca](mailto:Ahmed.Hussen@parl.gc.ca)

Adam Vaughan, Parliamentary Secretary to the Minister of Families, Children and Social Development (Housing), [Adam.Vaughan@parl.gc.ca](mailto:Adam.Vaughan@parl.gc.ca)

Cc: The Honourable Dr. Hedy Fry, Member of Parliament – Vancouver Centre, [hedy.fry@parl.gc.ca](mailto:hedy.fry@parl.gc.ca)

Jenny Kwan, Member of Parliament – Vancouver East, [Jenny.Kwan@parl.gc.ca](mailto:Jenny.Kwan@parl.gc.ca)

Don Davies, Member of Parliament – Vancouver Kingsway, [don.davies@parl.gc.ca](mailto:don.davies@parl.gc.ca)

Randall Garrison, Member of Parliament – Esquimalt-Saanich-Sooke, [Randall.Garrison@parl.gc.ca](mailto:Randall.Garrison@parl.gc.ca)

## **Re: Sex Worker Health and Safety During COVID-19**

On behalf of Living in Community, we are writing to offer several recommendations to your government to ensure that sex workers are healthy and safe during the ongoing COVID-19 crisis.

Living in Community (LIC) is an innovative community initiative that brings together different groups who are impacted by or have an impact on sex work: current and former sex workers, sex work support and advocacy organizations, Indigenous groups, health organizations, law enforcement, business, all levels of government, and social service organizations. By bringing stakeholders together to discuss community concerns, LIC identifies and acts upon collective solutions. The LIC model is an integrated way to improve the health, well-being and safety of all community members who are impacted by sex work, from sex workers themselves to businesses, community organizations, and residents.

As the COVID-19 pandemic has intensified, Living in Community and our stakeholders have become increasingly concerned about the health and safety of community members. This crisis is laying bare the inequalities that already exist in our society and exposing which groups and individuals are most vulnerable to violence, discrimination, and poverty. As your government begins to plan for an economic transition out of COVID-19, while supporting Canadians during the remainder of the crisis, it is more vital than ever to prioritize those who have fallen through the cracks for far too long.

We have heard from our stakeholders that the below recommendations are urgently needed. Background for each recommendation is provided following this list.

### **Recommendations:**

#### *Income Supports:*

1. Give funds to frontline organizations to distribute cash supports to sex workers ineligible for government supports.
2. Ensure the Canada Emergency Response Benefit is available to all sex workers, irrespective of immigration status.

*Organizational Support:*

3. Remove the requirement that non-profits and charities must prove a 15% loss of revenue in March 2020 in order to be eligible for the Canada Emergency Wage Subsidy.

*Access to Housing:*

4. Immediately house every unsheltered and inadequately-housed resident in British Columbia.

**Background:**

*Income Supports:*

1. Give funds to frontline organizations to distribute cash supports to sex workers ineligible for government supports.

Sex workers were among the first to see a sudden loss of income due to COVID-19 and are struggling to get through each day. While some sex workers have been able to pivot to online work or find alternative sources of income, not all sex workers have such flexibility. Im/migrant and street-based sex workers in particular have faced a total loss of income, and racism and xenophobia have led to even greater discrimination against im/migrant sex workers and sex workers of colour.

Further, as self-employed workers, many sex workers are not eligible for Employment Insurance or paid sick leave to protect their health and that of others. While the Canada Emergency Response Benefit is providing an important stop-gap for many workers and is available to some sex workers, the eligibility criteria and application process make it inaccessible for many including those who are street-based or reliant on cash for survival. The reasons for this are outlined under Recommendation 2, below.

Providing cash supports instead allows people to fulfill their individual needs with dignity and in a way more appropriate to their specific circumstances. Providing cash allows the government to overcome barriers to supporting marginalized individuals who may not have identification documents, employment records, or bank accounts. Further, individual cash supports can best be facilitated by support services that recipients already know and trust in their own communities.

Even as other industries may be able to resume work activities prior to having a vaccine for COVID-19 or reaching herd immunity in Canada, sex workers will continue to face the inability to work coupled with barriers to existing financial supports. We therefore join WISH Drop-In Centre Society, PACE Society, and SWAN Vancouver in recommending that frontline organizations be given funds to distribute cash supports to sex workers.<sup>1</sup> We propose that Women and Gender Equality Canada (WAGE) may be best positioned to distribute this funding.

2. Ensure the Canada Emergency Response Benefit is available to all sex workers, irrespective of immigration status.

As noted above, the Canadian Emergency Response Benefit is inaccessible for most sex workers. If workers have not yet filed their 2019 taxes or did not earn the \$5,000 minimum in the past year, they cannot apply. Some sex workers may not have a bank account, and others may fear sharing their personal information with a government due to uncertainty over how the information will be used. Sex

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<sup>1</sup> Letter from WISH Drop In Centre Society, PACE Society, and SWAN Vancouver to The Honourable Minister Morneau, April 17 2020. <https://drive.google.com/file/d/1VIREJQ9rOOxtE8u4SdZRIeBeCueps-zh8/view>

workers without a fixed address have difficulty applying for government programs, and migrant sex workers and those with precarious immigration status will not be eligible to apply for the CERB. Finally, for sex workers who are paid through bank e-transfers, receiving government supports through direct deposit may risk their clients' confidentiality, meaning these workers would avoid signing up for government programs that require banking information.

The CERB program is intended to be available until October 3, 2020, and it is imperative that the program is accessible for those who need it in the months ahead. We therefore recommend that CERB application criteria be relaxed in order to reduce barriers to sex workers receiving this benefit. The \$5,000 minimum income threshold for eligibility should be removed.

*Organizational Support:*

3. Remove the requirement that non-profits and charities must prove a 15% loss of revenue in March 2020 in order to be eligible for the Canada Emergency Wage Subsidy.

The frontline providers that support marginalized groups are in crisis. These organizations have seen a steep increase in urgent demand for their services, which will only continue for the duration of COVID-19. At the same time, these organizations are facing decreased ability to provide their services due to reduced staff capacity and reduced programming as they do their part to protect public health. At a time when frontline services for marginalized populations are needed more than ever, these necessary organizations are struggling to maintain a baseline of service while fighting for the funding they need.

Many organizations have experienced funding losses from government and private funders due to COVID-19. Emergency federal government support is available through the Canada Emergency Wage Subsidy (CEWS) program, but non-profits and charities still must prove a 15% loss of revenue as a result of COVID-19 in order to be eligible. Non-profits and charities operate differently than businesses in that they usually gather revenues throughout the year from a patchwork of initiatives including fundraising appeals and events, membership fees, grants from institutional funders, and more. Requiring non-profits and charities to prove a 15% loss of revenue from March 15 – April 11 2020 (or the subsequent 30% loss of revenue in April or May) does not make sense. Many non-profits and charities are more likely to see a gradual loss of revenue throughout the coming years due to fewer granting opportunities, reduced private donations, and difficulty holding fundraising events. The full financial impacts of COVID-19 on non-profits and charities will likely not be known for many months.

We therefore join with the Canadian Centre for Policy Alternatives and the 314 signatories on their open letter in calling for a removal of the 15% loss of revenue threshold for non-profits and charities to apply for the CEWS.<sup>2</sup>

*Access to Housing:*

4. Immediately house every unsheltered and inadequately-housed resident in British Columbia.

For people experiencing homelessness, unstable living conditions, or an unsafe home environment, simply staying home during COVID-19 is not an option. Many people do not have the ability to

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<sup>2</sup> Letter from the Canadian Centre for Policy Alternatives to the Right Honourable Justin Trudeau and others, April 7 2020. <https://www.policynote.ca/wp-content/uploads/2020/04/Letter-from-314-nonprofits-charities-partners-April-7-2020.pdf>

physically distance from others or to shelter in place. Appropriate washroom and handwashing infrastructure are not sufficiently available for many people, including those experiencing homelessness and street-based sex workers. In a March 2020 survey of Vancouver-based sex workers' self-described needs during COVID-19, access to housing was identified as a top concern.<sup>3</sup>

Municipal governments like the City of Vancouver have been undertaking quick, laudable initiatives to help in this crisis, such as installing temporary washrooms and handwashing stations in Vancouver's Downtown Eastside, but much more must be done. The temporary initiatives implemented to date are not enough to address the scale of the current crisis; they are not fully meeting the needs of all communities and they are designed only be implemented for a short number of weeks. Once the immediate crisis of COVID-19 ends and temporary measures like this are removed, many people will continue to live in unsafe, unstable conditions.

Moreover, COVID-19 has revealed the public health consequences when we allow members of our communities to live without adequate housing in 'normal' times. As the BC Poverty Reduction Coalition has stated, "[c]rowded SROs and 'petri-dish' shelters with shared bathrooms and showers do not provide access to adequate sanitation and leaves occupants and workers at great risk. Removing individuals from crowded shelter and housing stock after they develop symptoms is too little too late and undermines both individual and public rights and safety."<sup>4</sup>

We therefore join the BC Poverty Reduction Coalition in calling for immediate housing of all unsheltered and inadequately-housed individuals in BC.<sup>5</sup> The federal government has an important role to play in working with provincial and municipal governments to achieve this goal. Moving forward, the federal government should invest significantly in the key social determinants of health, including housing, food security, and health services – not just to be better prepared for the next public health emergency, but because no one should be suffering in our country.

Thank you for your consideration of these recommendations, and for the work of your government to date to ensure that everyone in our country is able to stay safe and healthy during and after this crisis. We welcome any opportunity to discuss this letter and our work further.

Sincerely,



Halena Seiferling, Director of Community Engagement  
Living in Community  
[director@livingincommunity.ca](mailto:director@livingincommunity.ca)

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<sup>3</sup> COVID-19 Needs and Risk Assessment of Sex Workers in Metro Vancouver, April 2020. <https://wish-vancouver.net/content/wp-content/uploads/2020/04/COVID-19-Needs-and-Risk-Assessment-of-Sex-Workers-in-Metro-Vancouver.pdf>

<sup>4</sup> Letter from the BC Poverty Reduction Coalition to the BC Housing & the Vulnerable Populations Working Group, the Honourable John Horgan, and others, April 2020. [http://bcpovertyreduction.ca/take-action/covid19\\_homelessness\\_action/](http://bcpovertyreduction.ca/take-action/covid19_homelessness_action/)

<sup>5</sup> Ibid.