



## Department of Justice and Regulation

Regulation

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Our ref: CD/16/610347

Ms Suzan Gencay  
Community Legal Education/Law Reform Lawyer  
St Kilda Legal Service  
161 Chapel St  
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Dear Ms Gencay

### **Advertising controls - Sex Work Regulations 2016**

Thank you for your letter dated 3 November 2016 to the Minister for Consumer Affairs, Gaming and Liquor Regulation, the Hon. Marlene Kairouz MP, relating to the interpretation of the advertising controls under the Sex Work Regulations 2016 (the Regulations). The Minister has noted your letter and requested that I respond on her behalf.

I have read the conclusions made in your letter regarding St Kilda Legal Service's proposed interpretation of the advertising controls under regulation 11(5) of the Regulations. While Consumer Affairs Victoria (CAV) cannot support the interpretation of paragraph (a) in the Conclusions and Recommendations section of your letter on the basis that pubic hair does not constitute an adequate covering, the other recommendations are reasonable and support the overall objectives of the advertising controls.

I note however that CAV's responsibility does not extend to providing legal advice, and comments in this letter should not be treated as such.

CAV reiterates that it takes a considered and proportionate approach to instances of non-compliance with the Regulations. Sex work service providers are provided with an opportunity early in the enforcement process to rectify any breaches of the advertising controls.

Thank you again for providing your comments on the Regulations, and your ongoing interest in the regulation of the sex work industry.

Yours sincerely

**Simon Cohen**  
Deputy Secretary, Regulation &  
Director, Consumer Affairs Victoria