

Attachment C

<h2>Plan of Management</h2>

PLAN OF MANAGEMENT 70 ERSKINE STREET, SYDNEY “*City Touch*”

(This document was updated November 2013 to incorporate changes to trading hours and continues to incorporate information contained in Policies and Procedures Manual Dated February 2009 and supersedes Plan of Management prepared by ABC Planning Pty. Ltd 2005)

Prepared in consultation with

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1. Premises Owner, Business Proprietors (managers) and Personnel Details

1.1 Premises Owner/Business Proprietors (managers)

A & S City Classic Pty. Ltd.
70 Erskine Street
Sydney NSW 2000

Directors:
Ms Suzhen Wu
Mrs. Yada Martyn
Ph: 0411 385608

The directors of the proprietor company (hereinafter referred to as "the managers" have overall responsibility for ensuring that the premises achieves the planning and design objectives of the City of Sydney planning controls and that the premises is operated in accordance with conditions of consent and approved plan of management and strategies included therein.

Furthermore, that the premises and business conducted therein is operated in accordance with all relevant government legislation and best practice guidelines including:

- Health and Safety Guidelines for Brothels in NSW: WorkCover NSW and NSW Health 2001
- Occupational Health and Safety in the Australian Sex Industry – Guide to Best Practice: Scarlet Alliance and the Australian Federation of AIDS Organisations 2000
- Equal Employment Opportunities
- Crime Prevention through Environmental Design
- All other relevant legislation.

The managers are also responsible for the day to day operations of the business. The roles and responsibilities of the managers include:

- Implementation and oversight of all health, safety, security and conduct policies and procedures
- Implementation of EEO requirements, NSW Health and WorkCover NSW Health and Safety Guidelines for Brothels and all other requirements and regulations of the NSW Health Department and the WorkCover Authority NSW including:
 - Provision and maintenance of equipment and systems of work that are safe and without risk to health.
 - In consultation with all personnel for the purpose of risk assessment, the identification of any hazard (including work practices or procedures) that has the potential to harm the health or safety of personnel, clients and visitors
 - Use of appropriate control measures to eliminate or reduce any identified risk
 - Monitor and review the control measures to ensure continual safety
- Oversight of all cleaning and infection control practices and procedures
- Oversight of all waste management practices and procedures
- Induction and supervision of all personnel

- Oversight of education and training of all personnel in all policies, procedures and practices, legislative requirements and best practice standards and guidelines
- Duty rosters for all personnel including contract cleaners. Rosters will ensure adequate time is taken between shifts and that which allows for self-care, rest and rejuvenation. The number of shifts worked in any given week being determined by sex workers and receptionists in consultation with the manager.
- Arrange for and attend monthly team meetings which provide for workplace consultation to enable all personnel to contribute to the decision making process which may effect their health, safety and welfare in the work place
- Resolving any issues of conflict between personnel and between personnel and clients
- Monitor and review safety and security precautions and cleaning and infection control practices to ensure the continued safety of the workplace
- Ensure a well stocked and secured supply of condoms, lubricants, dental dams, and disposable gloves are freely available and provided to sex workers before each client service
- Monthly evaluation of the premises for maintenance, repairs, replacement, supplies and waste management / collection.
- Maintaining the premises accident/injury and incident registers. In the case of serious accident or injury or other emergency situation, the WorkCover Authority of NSW will be advised
- Oversee the evacuation of the premises in the case of fire or other emergency
- Ensuring all fire safety equipment is in place and regularly serviced and provide an annual fire safety statement to the consent authority.
- Contacting police and other emergency services if and when required. The incident register will be provided to police in such an event occurring requiring the attendance of police or other emergency services
- Maintaining appropriate public liability, fire and general and workers compensation insurance.
- Allocation of space for the Sex Workers Outreach Project (SWOP) and other health services to visit with and/or conduct workshops for all personnel
- Attending health, safety, security and related meetings and seminars convened by SWOP or other relevant authority
- Providing information and direction on professional development opportunities and training for all personnel

1.3 Receptionists

The business engages the services of three receptionists with one receptionist on site per 8 hour shift. The receptionists report directly to the managers and, in the absence of the managers are responsible for the day to day operations of the business.

The role and responsibilities of the receptionists include:

- Working in conjunction with the managers to ensure that all policies and procedures including health, hygiene, safety and security and conduct standards and requirements are met and maintained including EEO requirements, NSW Health and WorkCover NSW Health and Safety

Guidelines for Brothels and all other requirements and regulations of the NSW Health Department and the WorkCover Authority

- Demonstrated knowledge of sexual health and infective pathogens and their prevention including:
 - Sexually transmissible infections (STI) including HIV, other blood borne viruses specifically hepatitis C and other body fluid/substance infections including hepatitis A & B, shigella and giardia
 - Legislative requirements of Section 13 of the Public Health Act 1991 which state: *any person who knows that they are suffering from a sexually transmissible disease and then has sexual intercourse with another person is committing an offence unless the person has been informed of the risk and has voluntarily agreed to accept the risk. Similarly, the proprietor or manager is also guilty of an offence if they knowingly permit sex workers suffering from a sexually transmissible disease to have sexual intercourse with other persons at their premises unless the client has been informed of the risk and has voluntarily agreed to accept the risk.*
 - Procedures for checking clients for and identification of obvious signs of an STI together with the use of appropriate lighting
 - Safe sex practices including proper use of condoms, dams and latex gloves
 - HIV Post Exposure Prophylactic (PEP) treatment
 - Immunization against hepatitis A & B and tetanus
 - Safe disposal of sharps and sharps safes
- Demonstrated knowledge of infection control and cleaning procedures and practices including:
 - Maintenance and use of cleaning equipment and products
 - Cleaning and maintenance standards
 - Maintenance of cleaning schedules
 - Maintenance of incident and accident/injury registers and reporting requirements as per WorkCover NSW requirements
- Ensure all safety and security policies and procedures are met prior to allowing access to the premises of any potential client or other visitor. This includes verifying identification of all people presenting at the premises purporting to be from a utilities service or government department including energy services (gas and electricity), telephone, fire protection, police or other government representative)
- Refuse entry to any person that appears to be intoxicated or under the age of 18 years
- Contact police, security and other emergency services if required.
In the absence of the managers, oversee emergency procedures for the evacuation of the premises in case of fire or other emergency
- Monitor the reception/waiting rooms including monitoring CCTV and the service rooms, entrance and emergency exit
- Oversee all daily and other regular cleaning procedures and practices and where and when necessary attend to daily maintenance and spot cleaning requirements to ensure the entire premise remains in a safe, clean, hygienic and presentable manner
- Maintenance and oversight of cleaning schedules
- Maintenance and oversight of maintenance schedule and supplies checklist
- Maintenance and oversight of garbage disposal systems

- Assist with induction and orientation of all new personnel and share knowledge and experience
- Maintain clean linen and towel supplies and ensure clean towels and linen are provided to each room after use and used towels and linen are stored in covered tidies until laundered.
- Answer telephones, accurately record messages and maintain office records
- Greet clients and other visitors and direct them to the appropriate waiting area, room or person
- Oversee introductions to sex workers
- Collection of monies or credit card clearances
- Allocation of service rooms
- Recording time of commencement of service, room allocation and expected time of completion
- Implementation and oversight of the business pre-session agreement procedures between sex workers and clients, safe sex policy and all other relevant policies and procedures
- Provide a support role to sex workers including support in refusing service to any client found to have an obvious sign of an STI or otherwise difficult
- Address any disagreements or problems between sex workers and between sex workers and clients
- Dissemination of sexual health and safe sex information for both sex workers and clients
- Ensuring all sex workers are familiar with the proper use of condoms, other safe sex products and the detection of obvious signs of an STI
- Ensuring adequate supplies of safe sex products are available and stored in a safe manner
- Providing sex workers with sufficient quantity of safe sex supplies and cleaning products and equipment prior to each client service
- Allocation of space for health workers to visit with and/or conduct workshops for sex workers and other personnel
- Honor the duty roster and shift obligations and if unable to attend wherever possible, telephone the managers in advance to arrange for a suitable replacement
- Attend monthly team meetings
- Pursue professional development opportunities to enhance knowledge and skills and keep abreast of any changes and requirements in relation to safe sex practices, work place practices, safety and security precautions and cleaning and infection control practices relevant to the operations of a commercial brothel

Where knowledge or experience is limited or non-existent, training will be provided by the managers or their appointed designee together with direction for professional development and other training opportunities.

1.4 Sex Workers

At the time of preparing this Plan of Management there are variable factors that determine the employment status of sex workers. That is, whether sex workers are deemed to be employees or contractors and therefore who is responsible for, and has control over matters such as tax, insurance, occupational health and safety and related work place issues and conditions.

WorkCover NSW and the Australian Tax Office each offer a means of determination based on

evidence of the relationship and arrangements in the workplace. These authorities would determine responsibilities based on the individual workplace's circumstances

Notwithstanding the employment status, the managers agree that both parties have a degree of responsibility to each other regardless of any contractual arrangements. This relates particularly to safety and security measures which are site specific and have been designed and implemented to protect all personnel while on site and to provide for the overall safe operations of the premises. As a consequence, communication and clear roles and responsibilities are considered essential to maintain the integrity of the premises safety and security policies and procedures and the safety and security of each individual on site.

While the subject business provides opportunities for adult women to provide a sexual or related service to a mostly male clientele, sex workers are able to set their own shifts including number of days worked per week, duration of shift and numbers of clients seen on any given shift. However, for their own safety and that of the premises, sex workers along with other personnel are encouraged to work together to support one another. As such, sex workers are asked to communicate directly with the managers and in the absence of the managers, communicate with the receptionist on duty.

The role and responsibilities of sex workers include:

- Working in conjunction with the managers and receptionists to ensure that all policies and procedures including health, hygiene, safety and security and conduct standards and requirements are met and maintained including NSW Health and WorkCover NSW Health and Safety Guidelines for Brothels and all other requirements and regulations of the NSW Health Department and the WorkCover Authority NSW
- Demonstrated knowledge and understanding of sexual health, and infective pathogens and their prevention including:
 - Sexually transmissible infections (STI) including HIV, other blood borne viruses specifically hepatitis C and other body fluid/substance infections including hepatitis A and B, shigella and giardia
 - Appropriate procedures for checking clients for and identification of obvious signs of an STI together with the use of appropriate lighting and process for refusing clients
 - Safe sex including proper use of condoms, lube, dams and latex gloves
 - HIV Post Exposure Prophylactic (PEP) treatment
 - Immunization against hepatitis A & B and tetanus
 - Personal limits in service delivery and self-care strategies including physical and emotional health and well-being
 - Safe disposal of any sharps located on the premises
 - Understanding of practical implications of the Legislative requirements of Section 13 of the Public Health Act 1991 which state: *Any person who knows that they are suffering from a sexually transmissible disease and then has sexual intercourse with another person is committing an offence unless the person has been informed of the risk and has voluntarily agreed to accept the risk. Similarly, the proprietor or manager is also guilty of an offence if they knowingly permit sex workers suffering from a sexually transmissible disease to have sexual intercourse with other persons at their premises unless the client has been informed of the risk and has voluntarily agreed to accept the risk.*

- Implementing the premises pre-session agreement procedures, safe sex policy and all other relevant policies and procedures
- Having the right of refusal to see a client if 1) they believe a client to have a STI 2) the client is intoxicated or otherwise difficult 3) the scope of the service required is outside their personal/professional boundaries and limits 4) they don't feel comfortable providing a particular client with a particular service.
- Comply with all other relevant policies and procedures and legislative requirements
- Pursue professional development opportunities to enhance knowledge and skills and keep abreast of any changes and requirements in relation to work place practices, security and safety precautions relevant to the operations of a sex services premises

Where knowledge or experience is limited or non-existent, training will be provided by the managers or their appointed designee together with direction for professional development and other training opportunities and supports.

1.5 Contract Cleaner

The business will engage the services of a contract cleaner on a daily basis. The managers, receptionists and sex workers attend to all other daily cleaning and maintenance and spot cleaning requirements.

The role and responsibilities of the contract cleaner includes:

- Demonstrated knowledge of cleaning and infection control procedures and practices including:
 - Maintenance and use of cleaning equipment and products
 - Maintenance of cleaning schedules (full daily cleaning and other daily cleaning and maintenance activities)
- Demonstrated knowledge of transmission and prevention of infective pathogens including:
 - Personal protective hygiene practices (wearing of gloves and hand washing)
 - Safe disposal of sharps and sharps safes
 - First aid in case of sharps injury and/or blood or body fluids/substance exposure
 - Blood borne or body fluid/substance viruses and bacterial infections including hepatitis A, B and C, shigella and giardia
 - HIV Post Exposure Prophylactic (PEP) treatment
 - Immunization against hepatitis A & B and tetanus
- Maintain the cleanliness of the premises and all fixtures, fittings and equipment within a structured program of routine and non-routine cleaning
- Report any damage to premises including furniture, fittings, fixtures and equipment to the manager and/or the receptionist
- Observe safe manual handling and handling of potentially hazardous waste and cleaning chemicals at all times
- Maintenance, storage and replacement of cleaning products and equipment
- Dusting, vacuuming and mopping all floors
- Cleaning all surfaces, furniture, fittings, fixtures and equipment in all

- rooms including sanitary facilities and spa baths
- Use of cleaning products as per manufactures instructions.
- Removal of any waste from rooms and oversight of waste disposal systems ensuring appropriate storage and collection of waste
- Placement of warning signs where areas may be damp or slippery following cleaning
- Bactericidal liquid soap is to be used in the pump action soap dispenses at hand basins.
- Completion of cleaning schedules and oversight checklist for all other daily cleaning and maintenance activities
- Pursue professional development opportunities to enhance knowledge and skills and keep abreast of all changes and requirements in relation to cleaning and infection control practices and safety precautions relevant to the commercial sexual services industry
- Honor service contract agreement and if unable to attend, telephone the manager in advance to advise of replacement personnel

2. Description of Premises

2.1 The Site

The premises is located at 70 Erskine Street, Sydney and is comprised of a 4 level masonry building with access at ground level at the Erskine Street frontage with emergency and deliveries egress at the rear access way to Kent Street at the rear of the premises. A clearly visible street number denoting the entrance is located on the building facade.

2.2 Services and Facilities

The business provides the services of a commercial brothel catering to an adult predominantly male clientèle. Additional services include the provision of water, tea and coffee, clean towels, linen, liquid soap and paper towels, safe sex products and sexual health and other harm minimization related products and information

Facilities include:

- Entrance
- Reception area
- Two client waiting rooms
- Managers' office
- Six client service rooms all with en suite facilities including shower and one room equipped with a single use spa bath
- Sex worker and other personnel private facilities including relaxation room with Kitchenette
- Two client bathrooms with toilet and hand basin
- Laundry
- Garbage storage area

With development consent, a separate bathroom (with toilet, shower and hand basin) will be provided at the ground floor level for the exclusive use of personnel including sex workers. See floor plans

2.3 Hours of Operation

The premises operates 8am to 4am 7 days a week.

2.4 Number of Sex Workers

There shall be a maximum number of six (6) sex workers engaged in the performance of their duties at any one time.

2.6 Access and Mobility for People with a Disability

The managers seek to cater to all members of the community and to meet wherever possible and within the constraints of the existing building, the objectives of the Disability Discrimination Act, 1992. However, the premises cannot provide access to people with mobility issues requiring the use of ramps and lifts. If the premises was required to provide such access, it would require extensive reconstruction and would necessarily be the subject of a claim for unjustifiable hardship.

In further consideration of ease of access to and appropriate service delivery for people with a disability without specific mobility issues requiring the use of ramps and lifts, the managers will ensure that appropriate and relevant training is accessed for sex workers and other personnel. Such training will ensure familiarity with and understanding of the range of issues concerning the sexual and other needs of people with a disability with a special emphasis on commercial sexual services. Training opportunities are to be accessed in consultation with People with Disabilities (NSW) Inc. and the Sex Workers Outreach Project (SWOP)

3. Safety, Security and Conduct

Safety and security policies and procedures and practices are only as good as the instructions and training provided and the systems in place. A cohesive team approach is essential and this necessarily requires the development of trust and respect and support between management and personnel. To this end, all the training and refresher training programs are to ensure that each individual on site is made aware of and understands the practical application of all relevant safety and security policies and procedures and that it is the responsibility of each individual to maintain all safety and security precautions to prevent any one person or the whole business being put in jeopardy.

Together with an induction process and individual supervision, the managers will conduct monthly team meetings. These meetings are to be used to develop a team approach to maintaining a safe and secure environment for all. Team building strategies are to be based on a peer education and support model and one that reinforces the need for a collective approach in that individuals are not only responsible for themselves but they understand how their actions may affect others. This requires the development of trust and respect and while respecting the individual's privacy, understanding the importance of sharing work related skills and related information and identifying hazardous work practices and procedures which equates generally, for the need to support each other in order that no one is put at risk.

Additionally, all personnel are to be instructed in how to deal with difficult clients, refusing service to a client with an obvious sign of an STI and how to summons assistance if and when required. Once again, prevention of difficult situations is the first course of action. To this end, training and instruction is to be provided to sex workers and other personnel in the need to vet all visitors as per policies and procedures before being granted entry and to fully negotiate the services to be provided in a pre-session agreement. The information provided should include prices, time constraints, the policy of non-refundable service fees, personal limitations including physical and psychological limits, safety precautions such as the need for checking clients for obvious signs of STIs and for the use of condoms and dams at all times, time requirements and constraints and special needs (if any) of the client.

It is acknowledged by the managers that where problems arise, it is most likely to occur through a misunderstanding or misrepresentation of the services to be provided and/or the sexual functioning of the client. Sexual functioning problems can be associated with alcohol or other drug consumption and/or psycho/sexual or physical impairment and the client may then demand additional time outside of the original time-frame and/or demand a refund of his/her money. While all necessary precautions are undertaken to restrict unauthorized and/or intoxicated persons from gaining entry to the premises, it is acknowledged by the managers that it does not always require excessive and obvious alcohol or other substance use for sexual functioning to be impaired. Additionally, it is not always possible to enquire at the outset as to the client's sexual functioning ability and what, if any, supports the client requires. This usually becomes self-evident as the session progresses but the question to be asked is the length of time the client feels he/she needs for a satisfactory session.

The strategies for preventing entry to unauthorized and/or intoxicated persons and the pre-session agreement that all sex workers are required to enter into with the support of the managers and/or the receptionists, will eliminate many of the problems which might generate client displeasure and/or result in violent or anti-social behaviour.

In the unlikely event of an incident occurring within the premises, the managers or the receptionist managers and/or receptionist, move away from the area, not to in any way escalate the situation and wait for the police.

Additional to and in support of the above, the following strategies are to be implemented to further ensure the safety and security of all personnel, clients and visitors to the premises and external to the premises:

- Management and monitoring of all people entering and leaving the premises
- Duress buzzers are strategically placed in each service, personnel private facilities and at the reception desk. It is important to note that duress buzzers should only be used when it is safe to do so and relevant training will be provided (see Clause 6.1 dot point 7)
- A safe designed and installed to Australian Standards. The safe shall be anchored and incorporate a drop chute and time delay facilities
- Installation of intruder alarm system designed and installed to the Australian Standard – Domestic and Commercial Alarm System
- Intercom system in each service room
- Pre-coded speed dial to emergency services
- CCTV cameras to monitor the premises (see attached floor plans for locations).
- Fire and other emergency evacuation plan. All personnel are to be trained in emergency evacuation procedures, including the use of the emergency services number coded into the telephone for easy access to emergency services **(see attachments D and E)**
- Fire safety. Fire extinguishers, exit signs/emergency lighting and smoke detectors are to be located throughout the premises as required by the Building Code of Australia. All fire safety equipment is to be serviced regularly and all personnel are to be trained in the use and operation of fire extinguishers. An annual fire safety statement is to be submitted to the consent authority.
- A street number identifying the location of the entrance to the premises

- is located at the front of the building and is clearly visible from the street.
- A vandal resistant lighting fixture of ordinary appearance such as is placed on the entry points of any residential building is to be located above the street number for easy identification to assist clients and visitors and emergency services in identifying the location and street number. This lighting should provide an even distribution of light with limited capacity for glare
- The entrance to the reception area is to be secured with a security grill that can be easily opened from the inside in the case of fire or other emergency
- The premises will be equipped with remote door release mechanisms and there will be no internal locking devices on service room doors
- An emergency exit is available at the rear open access way to Kent Street at the rear of the premises
- Prior to entry, all visitors to the premises are to be vetted firstly through the security cameras and then via physical vetting at the security door prior to being able to gain access to the reception area.
- Adequate lighting for security purposes is to be located at the entrance and in all hallways and reception area
- Maintenance of community liaison/incident and accident/injury registers. Any breach of security or accident or injury is to be entered into the requisite registers. The community liaison/incident book is to be provided to police if and when necessary. Any serious accident, injury or emergency situation will be reported to WorkCover NSW
- Where circumstances warrant, the managers or receptionist will contact police or other emergency services and all assistance will be given to them in their investigations
- Service time and wherever possible, special needs of clients are to be monitored and all sex workers advised to notify the managers or the receptionist if they are extending the original session time

Additional to the above, the managers or their nominated designee will liaise regularly with the Sex Workers Outreach Project (SWOP) and provide space for on-site workshops and visits by SWOP staff or other representatives of health and security or related services. The SWOP private sex industry publication known as 'The Ugly Mug List' is to be used to further exclude from the premises any potentially violent and/or anti-social people.

3.1 Restricting Access

The management policy on restricting access is to be prominently displayed at the entrance and in the reception and client waiting rooms and personnel private facilities. This Policy is to apply to underage access and unauthorized and unidentified entry to the premises of persons purporting to be from utilities services (gas and electricity), government departments/agencies (fire equipment maintenance, police, council or health authority) and other service providers.

The Policy contains the following information:

Restricted Access
Persons under 18 years of age may not enter
Photo ID may be requested
All service providers including government officers must provide identification

Signed Management

The standard identification procedure used for restricting underage access, when the age of the person is questionable includes the following:

- Requesting photo ID or other acceptable identification
- If age is verified and is acceptable, the individual is permitted entry
- If age is verified to be under 18, the individual will be denied access and escorted off the premises
- If in any doubt about the age, even with photo ID, the individual will be refused entry
- If an individual is denied entry, they will be requested to leave the premise in a quiet and orderly manner. And the incident is to be reported to the manager and entered into the premise incident book

The same process is to be used to determine the age of potential personnel including women seeking work as sex workers and receptionists.

The standard procedure for checking the credentials of persons purporting to be from a utilities service (gas and electricity), government departments/agencies (fire equipment maintenance, police, council and health authority) and other service providers includes:

- Requesting identification and where possible photo ID
- If identification is acceptable, the individual or individuals are permitted entry but are to be supervised at all times while on the premises
- If in doubt about the identification, the individual/individuals will be refused entry and advised the house policy does not permit entry to service providers without appropriate identification. If the manager is not on the premises at the time, they will be provided with the manager's mobile number and advised to phone the manager to make an appointment
- In the case of an individual/individuals being denied entry, they will be requested to leave the premises in a quiet and orderly manner and advised to phone the manager at a later time
- Any unidentified and unauthorized attempted access will be reported to the manager and entered into the incident book

See Attachment A – Restricted Access Policy

3.2 Conduct Policy

In order to minimize any potential amenity impacts on the surrounding land owners or occupiers by the arrival or departure of clients, visitors and personnel, the management policy on conduct is provided in personnel training and is prominently placed in the reception and client waiting rooms and the personnel private facilities

This policy reflects the need to maintain a quiet and peaceful presence in the street and surrounds and for the discrete and orderly operation of the business. To this end, all personnel, clients and other visitors are made aware of noise restrictions and are instructed to enter and exit the premises in a quiet and orderly manner. Receptionists are instructed in telephone procedures in which all callers are provided with location details, business hours, session booking and other appointment requirements, car parking and public transport access information.

The conduct policy contains the following information:

**CITY TOUCH
CONDUCT POLICY**

Access to our premises is from front of No. 70 Erskine Street, Sydney. The location is denoted by the number 70 located at the front of the building which is clearly visible from the street. The preferred method of access is to phone in advance to make an appointment.

Unfortunately we are unable to provide on-site parking. There is a public parking station close to the intersection of Erskine Street and Kent Street and some time-limited street parking with clearway restrictions in the vicinity. A pre-booked appointment will advise of restrictions. Additionally, a number of government buses service the area from the city and surrounds and the premises is within a 3 minute walk of Wynyard railway station.

HOURS OF OPERATION

**8 am to 4 am
7 days a week**

Please ensure that when arriving and leaving our premises that you consider our neighbours and conduct yourself in a quiet and orderly manner

Signed Management

See Attachment B – Conduct Policy

3.3 Illegal Activities on the Premises

The Management Policy on illegal activities including the sale, use and supply of illicit drugs and/or intoxicated behavior on the premises is to be prominently displayed in the reception, client waiting rooms and personnel relaxation room.

The Policy contains the following:

ILLEGAL ACTIVITIES POLICY

Illegal activities including the sale, supply and/or use of illicit drugs on the premise is strictly prohibited.
Anyone visibly affected by alcohol or drugs is not permitted entry.
The Management may report any illegal activity to the Police.

Signed Management

Any personnel found involved in any illegal activity will be dismissed immediately and referred where applicable to relevant health and welfare services.

See Attachment C – Illegal Activities Policy

3.4 Control of Anti Social Behavior

As stated previously in this document, prevention of anti-social behaviour is the first course of action. To this end, all visitors are vetted before being allowed into the premises. The system for vetting clients and other visitors occurs firstly through the security cameras monitoring the entrance to the premises. Secondly, a security grill at the entrance to the reception area prevents unassisted entry.

The receptionist or managers then assesses whether to permit entry to the person first, having conversed with them at the security door. Any visitor that appears aggressive, severely affected by alcohol, under the affects of drugs or otherwise suspicious will be politely refused entry and requested to leave the premises. The managers and/or the receptionist are to attend to the matter in as diplomatic a manner as possible. In the event a person refuses to leave the premises, the police will be called immediately.

3.5 Emergency Procedures

All personnel are to be trained in emergency procedures as part of ongoing personnel training including familiarity with evacuation procedures, fire exits and position and use of fire extinguishers throughout the premises. In the event of fire or other emergency requiring evacuation of the premises, the manager or the receptionists will implement evacuation procedures. All persons are to be removed from the premises immediately. The managers or the receptionists will report the fire or other emergency immediately to the appropriate emergency service via the pre-coded entry in the telephone

In the event of a situation occurring where medical assistance is required, the managers or the receptionist will call emergency services for an ambulance and all assistance and necessary information will be provided

See Attachment D – Fire or other Emergency Situation Evacuation Procedures
See Attachment E – Emergency Numbers and Community/Health Resource List

4. Maintenance, Services and Supplies

The premises is to be kept in a satisfactory state of repair at all times and is to be evaluated monthly to determine the state of repair or supply of goods and services. **See appendix F Maintenance Schedule and Supplies Checklist and Record**

4.1 Cleaning of Premises

The premises is to be kept in a clean, hygienic and tidy condition ranging from full daily cleaning by a contract cleaner to daily maintenance and spot cleaning which, is to be attended to by the manager and/or receptionists and sex workers. The manager will provide appropriate training, cleaning products and equipment including gloves to provide a clean and safe environment.

All sanitary facilities are to be cleaned daily and more frequently in the case of blood or body fluid spills or other detritus. They are to be cleaned first with neutral detergents and any bleach or disinfectants are to be used strictly in accordance with the manufactures instructions.

All equipment used for mopping including mop and bucket are cleaned with warm water and detergent after use and the equipment is then stored to dry with buckets placed upside down and mop heads supported off the ground. Cloths used for cleaning sanitary facilities and surfaces are to be disposed of after use.

All personnel including sex workers and the contract cleaner are required to wear gloves when performing any cleaning duties and are advised to wash hands firstly with gloves on and again after removing gloves. Other occupational health and safety issues in respect to cleaning are provided for in the occupational health and safety training program.

See appendix G Cleaning Checklist and Cleaning Record

4.2 Laundering and Maintenance of Towels and Linen

The managers will provide an adequate supply of linen and towels. Clean linen and towels are to be stored in closed receptacles and used linen and towels are stored in appropriate covered linen tidies until laundered. All linen and towels, which may come into contact with bodies, are changed immediately after use regardless of whether contact with body fluids has occurred. If towels or similar bed coverings are used, they will be of sufficient size to prevent body contact with (underlying) bed linen that is not intended to be changed after each client. Any mattresses used are to be fitted with washable mattress covers and if soiled, are to be removed and washed prior to re-use.

Laundry is to be washed and dried on site. All laundry is to be washed in a hot water wash that is at a water temperature of 65 degrees Celsius and thoroughly dried after the hot water wash.

5. Health and Safety

The health and safety of sex workers, clients, other personnel and visitors is of paramount concern to the managers together with the overall safe, secure and hygienic operations of the premises. To this end, the following strategies have been developed and are to be implemented as part of the workplace occupational health and safety training:

- Promotion and support of safe sex practices. Safe sex products including condoms in variable sizes and other safe sex equipment is to be stored in a secure area, replaced regularly and provided free of charge to all sex workers
- Safe handling policy and procedure for disposal of sharps and sharps safes
- An accident/injury register is to be kept on the premises and maintained by the manager and/or the receptionists. Any serious accident, injury or other emergency is reported to WorkCover NSW
- Adjustable lighting is provided in all client service rooms to properly enable sex workers to check clients for obvious signs of sexually transmissible infections (STIs)
- Sex workers are to have the full support of and assistance of the manager to refuse a client if the client is found to have an obvious sign of a STI or is otherwise difficult.
- Any client found to have an obvious sign of an STI is to be informed to seek medical assistance and will be referred to a sexual health center
- Information for clients on safe sex are provided in all client service rooms and client waiting rooms
- Identification and information brochures on STIs including HIV for all personnel
- A bulletin board is to be located in the personnel private facilities.. It is to be used for the posting of up to date information on sexual and general health and safety issues for the benefit of all personnel
- All personnel are to be encouraged to avail themselves of free immunization against Hepatitis A & B and referral to a range of health care facilities is provided. Information in this regard is posted on the information bulletin board in the personnel private facilities.
- The managers are to liaise regularly with health and related authorities to ensure that best practice health and safety procedures are adhered to. Up to date information in the form of advice and print material is to be accessed through the NSW Health Department, local sexual health clinic and the Sex Workers Outreach Project (SWOP). This information is to be available in a variety of most frequently spoken languages.

- CPR procedures are to be placed on the back of all client service rooms, bathrooms and personnel private facilities. **See Attachment H – CPR Procedures (illustrated instructions)**
- Space is to be provided for the Sex Workers Outreach Project (SWOP) and other health related services to conduct information sessions for sex workers and other personnel on health and safety issues
- Linen and towels are to be replaced after each client service and appropriate storage facilities are to be provided for storage of used and clean linen and towels
- Sharps disposal units are to be located in all sanitary facilities and are to be serviced on an as needs basis. See Clause 5.2 – Maintenance and Handling of Sharps and Sharps Safes.
- The receptionists are to carry out regular spot cleaning of the premises. Used condoms and other refuse are removed from client service rooms following each incident of use and new waterproof liners are replaced in rubbish receptacles.
- Liquid soap and paper towels are provided in all sanitary facilities and personnel private facilities. Bactericidal liquid soap is to be used in the pump action soap dispenses at hand basins.
- All personnel are to be given ample time to attend meetings and other information gathering opportunities relevant to workplace occupational health and safety issues.
- Sex workers are to be given ample time to attend their medical service provider for sexual and related health check ups. It should be noted that sexual health attendance certificates are not shown to clients
- Smoking is not to be permitted in the building

Additionally, the Management Health and Safety Policies provides that sex workers have the right to refuse a client regardless if they suspect the client is infected with a STI or not. As referred to above, any client with an obvious sign of a STI will be informed to seek medical advice immediately.

5.1 Safe Sexual Practices and Availability of Condoms and Other Safe Sex Products

The Management Policy on Safe Sexual Practices is to be prominently displayed in the reception room and client waiting rooms.

The Policy contains the following:

SAFE SEXUAL PRACTICES POLICY
 Management supports the practice of safe sexual practices
 and provides free of charge safe sex products including
 condoms, lubricants, latex gloves and dental dams
Signed Management

Additional to promoting a policy of safe sexual practices and providing safe sex products, information and referral advice, the following range of safe sex products are provided free of charge and include:

- condoms in variable sizes
- water-based lubricant
- dental dams

- disposable latex gloves

All products used are to comply with and be in accordance with Australian Standards and are to be stored in a secure area away from light and heat and the potential for tampering by clients. Any sex aid devices that are used will be used in conjunction with a new condom for each person. The equipment is to be cleaned and securely stored after each use.

See Attachment I – Safe Sexual Practices Policy

5.2 Maintenance and Handling of Sharps and Sharps Safes

Sharps' disposal units are to be located in all sanitary facilities. Given the potential for transmission of blood borne infections, maintenance and handling of sharps and sharps safes are to be an integral part of the training program. This includes first aid procedures, reporting and referral in the case of a needle stick injury or contact with a body fluid or body substance. It should be noted that clients with erectile difficulties may use syringes for the direct injection of medication into the penis to assist an erection and should be directed to the client toilet to administer such injection and dispose of any used sharps in the sharps disposal unit provided.

Rush Needle and Syringe Program will provide sharp safes. The managers are responsible for conveying any filled sharp safes and accessing new sharp safes as required. Contact details are as follows:

REPIDU

103-105 Redfern Street,
Redfern NSW 2008 (enter via Turner Street)
Ph: 02 9395 0400

See Attachment J – Needle Stick Injury Prevention and Information Policy and First Aid (following contact with a body fluid, body substance or needle stick injury)

6. Education Information and Training

As stated above, sex workers and other personnel training includes induction, refresher training and supervision on the range on management policies and procedures and occupational health and safety and public health policies and procedures. Monthly team meetings are used, as a consultation process to identify gaps in knowledge and practice, identify potential risks and consequent training needs. Occupational Health and Safety consultants are to be engaged if and when required to assist in the ongoing training process

The managers or nominated designee will liaise with all relevant authorities to ensure all necessary occupational health and safety standards and public health requirements are met and adhered to. The following publications are used as guidelines for occupational health and safety instruction:

- A Guide to best practice Occupational Health & Safety in the Australian Sex Industry – produced by the Scarlet Alliance and the Australian Federation of AIDS Organizations 2000.
- The Workers Handbook produced by SWOP
- SWOP STI identification booklet.
- Health and Safety Guidelines for Brothels – WorkCover NSW Health and Safety Guide 2001 – produced by NSW Health and WorkCover NSW in consultation with SWOP (translations available in most frequently spoken

languages)

6.1 Management Policies and Procedures

The induction and refresher training program for all personnel shall include the practical application of the following management policies and procedures:

- Restricted Access Policy
- Illegal Activities Policy
- Conduct Policy
- Safe Sexual Practices Policy
- Pre-session verbal contract Policy
- Dealing with difficult/anti-social and/or violent behaviour including process for and content of pre-session agreements
- Emergency procedures including how to summons emergency service assistance, location and use of fire extinguishers and emergency exits and evacuation procedures
- Use and maintenance of security mechanisms including back to base alarm system, intercom and duress buzzers. It is important to note that duress buzzers should only be used when it is safe to do so
- Use and maintenance of community liaison/incident register including reporting requirements
- Use and maintenance of accident/injury register including reporting requirements
- Implications of Section 13 of the Public Health Act 1991.

6.2 Occupational Health and Safety Policies and Procedures

The induction and refresher training program for all personnel shall include the practical application of the following occupational health and safety policies and procedures:

- Sexual health and general health information including transmission and prevention of the range of sexually transmissible infections (STIs) including HIV and hepatitis A, B and C, bacterial infections, safe sex practices and other harm reduction practices together with information on a range of sexual health clinics and related services
- Proper storage and use of condoms, dental dams and lubricant
- Checking clients for visible signs of STIs and the need for appropriate lighting and management support if necessary
- Safe handling and disposal of sharps and sharps safes, needle stick injury precautions and reporting requirements in the case of a needle stick injury
- First aid following contact with a body fluid, body substance and/or needle-stick injury and procedures on finding a needle and syringe on the premise. (see procedures document attached hereto)
- Information and explanation of Section 13 of the Public Health Act 1991 Penalties for knowingly transmitting a sexually transmissible infection (STI)
- Hygiene, cleaning and maintenance requirements and processes (To provide for the appropriate cleaning and the health and safety of contract cleaning personnel and others engaged in any cleaning duties, information is to be provided on infection control requirements and safety precautions)

7. Waste Management (collection)

Used condoms, tissues and the like are not considered hazardous waste and are therefore able to be collected with ordinary trade waste. A trade waste contractor is contracted on a twice weekly basis. The frequency of trade waste collections will be regularly reviewed and additional collections will be implemented as needed.

The following arrangements provide for the requisite storage, handling and disposal of waste:

- A secure garbage storage area is located at the rear of the premises and will accommodate both putrescible waste and recycling bins.
- Service room waste bins are to be lined with waterproof liners and are to be emptied following each incident of room use. Waterproof liners are then to be replaced in the waste bins. Waste is then placed in the main garbage receptacles awaiting collection
- Non-reusable sharps containers which comply with Australian Standard AS 4031 are placed in all sanitary facilities and serviced as needed as per Clause 5.2 above

8. Car Parking

There is no provision for on site parking.. Clients and others are to be advised of the location of the nearest public parking station as identified in the premises Conduct Policy along with location and means of other modes of public transport

9. Signage

The only signage the premises will display includes:

- a clearly visible street number which is to be located above the entrance to denote the entry point
- notation of the business hours is located on the entrance door to the premises

10. Noise

As per Clause 3.2 Conduct Policy, all personnel, visitors and clients are made aware of noise restrictions and are instructed to enter and exit the premises in a quiet and orderly manner.

11. Ventilation and Lighting

The premises is to be ventilated in accordance with the requirements of the Building Code of Australia. Additionally, the premises shall be provided with adequate lighting in accordance with Australian Standards AS 1680.

DATED the _____ day of _____ 2013

SIGNED by the Directors of A & S City Classic Pty. Ltd.

.....
Suzhen Wu
Director

.....
Yada Martyn
Director

ATTACHMENT A

Restricted Access Policy

ATTACHMENT B

Conduct Policy

ATTACHMENT C

Illegal Activities Policy

ATTACHMENT D

Fire and Other Emergency Situation Evacuation Procedures

ATTACHMENT E

Emergency Numbers and Community Resources/Health Services

ATTACHMENT F

Maintenance Schedule and Supplies Checklist and Record

ATTACHMENT G

Cleaning Checklist and Cleaning Record

ATTACHMENT H

CPR Procedures (illustrated instructions)

ATTACHMENT I

Safe Sexual Practices Policy

ATTACHMENT J

Needle Stick Injury Prevention, and Information
Policy including first aid contact person

And

First Aid following contact with a body fluid, body
substance or needle stick injury