**SUBMISSION BY THE WOMEN’S LEGAL CENTRE TO THE UN SPECIAL RAPPORTEUR ON THE RIGHT TO ADEQUATE HOUSING AND THE UN SPECIAL RAPPORTEUR ON EXTREME POVERTY AND HUMAN RIGHTS JOINT REPORT TO THE HUMAN RIGHTS COUNCIL IN 2024**

**On Decriminalization of Homelessness and Poverty**

**15 September 2023**



* 1. **INTRODUCTION**

1. The Women’s Legal Centre welcomes the opportunity to make submissions on the “Decriminalization of Homelessness and Poverty” questionnaire as called for by the UN Special Rapporteur on the Right to Adequate Housing and the UN Special Rapporteur on Extreme Poverty and Human Rights in preparation their joint report to the Human Rights Council in 2024.
2. The WLC recognises that there is an overlap in the answers that will be provided to the questions as outlined in the questionnaire and has chosen to make this submission in the following manner, namely:
   1. **First,** we will provide an overview of the Women’s Legal Centre and its work, in particular, the work we conduct relating to the decriminalisation of poverty and homelessness, including the rights of sex workers who are unhoused and conduct their work on the street.
   2. **Second,** we will provide a brief overview of the legislative framework in South Africa that is applicable to the questionnaire,
   3. **Third,** we will discuss the lived reality of women who are unhoused and the intersecting ways in which they experience discrimination,
   4. **Fourth,** we will answer the five questions as listed in the questionnaire.
   5. **OVERVIEW OF THE WOMEN’S LEGAL CENTRE**
3. The Women’s Legal Centre (“The WLC”)[[1]](#footnote-1) is an African feminist legal centre that advances women’s rights through strategic litigation, advocacy, education and training. Through these methodologies, we develop feminist jurisprudence that recognises and advances women’s rights to substantive equality. The WLC drives a feminist agenda that recognises women in their diversity. Our work is under pined by the principle of intersectionality that recognises and highlights the impact that discrimination has on women within their different classes, races, ethnicities, sexual orientations, gender identity, nationality, and disability.
4. These submissions form part of the work being undertaken to advance women’s rights to housing, land and tenure security and the intersection between this and their right to live in just and favourable working conditions. In these areas of rights realisation, we work specifically with women who work in vulnerable and precarious conditions such as domestic workers, farm workers, migrant workers and sex workers. We also work with women and organisations that advance the rights of persons with diverse sexual orientation, gender identity and sexual characteristics.
5. In its litigation and advocacy work, with the above groups we have analysed and put forward arguments that highlight the gender (including gender identity) and sexual orientation-based discrimination that women who are unhoused or seek to make an income from living or working on the streets in the inner cities of South Africa experiences. We have advocated for and do so now that the work of the Special Rapporteur should reflect for an understanding and appreciation that discrimination is often not singular and that women, based on where they are positioned within our society, will experience compounding forms of discrimination. Remedies and recommendations therefore need to take this compounded impact into account to ensure rights realisation, protection, and advancement to achieve substantive equality for all.

**III. THE LAWS APPLICABLE TO THE UNHOUSED IN SOUTH AFRICA**

CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA

1. The Constitution[[2]](#footnote-2) is the cornerstone of democracy in South Africa and therefore all policies and laws adopted by the legislature must be done in line with the spirit and ambit of the Constitution to ensure the realisation of the rights as contained therein.
2. Chapter 2 of the Constitution contains the Bill of Rights which sets out the basic human rights which are applicable to everyone within the republic of South Africa. The rights which are important to set out for the purposes of this submission include the following but are not limited to:
   1. The right to Equality as contained in s9;
   2. The right to Human Dignity as contained in s10;
   3. The right to Freedom and Security of the person as contained in s12;
   4. The right to Privacy as contained in s14;
   5. The right to Freedom of movement and residence as contained in s21;
   6. The right to Property as contained in s25;
   7. The right to Housing as contained s26;
   8. The right to Social Security as contained in s27;
   9. The right to Access the Courts as contained in s34; and
   10. The right to a Fair Trial as contained in s35 of the Constitution.
3. Chapter 7 of the Constitution further provides for the operation and purpose of local government and sets out the object and duties of local governments and municipalities.
4. Although the Constitution provides for the progressive realisation of these rights, in particular the rights to land and housing and social security, the lived reality of black women in South Africa continue to remain the face of poverty and discrimination and where they have access to housing or social services, such access is inadequate and undignified.

MUNICIPAL BY LAWS

1. The by-laws of a municipal council are legislative acts. The power of municipal councils to make law is protected in s40(1) of the Constitution, which provides, “[i]n the Republic, government is constituted as national, provincial and local spheres of government which are distinctive, interdependent and interrelated’. In turn, subsections 43(c) and 151(2) confer original legislative and executive authority on municipal councils. Section 151 (3) provides that “a municipality has the right to govern, on its own initiative, the local government affairs of its community, subject to national and provincial legislation, as provided for in the Constitution.”
2. Sections 152 and 153 of the South African Constitution5 also sets out the objects of local government and impose specific developmental duties, and they are:
   1. to provide democratic and accountable government for local communities;
   2. to ensure the provision of services to communities in a sustainable manner;
   3. to promote social and economic development;
   4. to promote a safe and healthy environment; and
   5. to encourage the involvement of communities and community organisations in the matters of local government.”
3. Section 153 goes further to state that a municipality must structure and manage its administration and budgeting and planning processes to give priority to the basic needs of the community, and to promote the social and economic development of the community; and participate in national and provincial development programmes”.
4. These obligations have been further defined in legislation such as the Municipal Structures Act 117 of 1998, the Municipal Systems Act 32 of 2000 and other national legislation.
5. **QUESTIONNAIRE**

**Laws or regulations that prohibit begging, eating, sleeping, or performing personal hygienic activities in all or certain public places (please kindly include the wording of these laws and regulations and specify whether they are effectively enforced).**

1. Within the South African context, the laws described above fall within the ambit of local government authority as stipulated above and are enforced by local authority policing structures.
2. The Western Cape, City of Cape Town By-Laws relating to Streets, Public Places and The Prevention of Nuisances, 2007[[3]](#footnote-3) was created at a Municipal and local government level for the effective administration of such matters as the control of public nuisances, municipal roads, public places, traffic and parking; acknowledging that aggressive, threatening, abusive or obstructive behaviour of persons in public is unacceptable to the City. This is an example of similar, colonial-type laws that exist in other provinces in our country at municipal level.
3. Section 2 of the City of Cape Town by-law lists a range of prohibited behaviour, and the ones most commonly being applied and enforced against unhoused persons in the inner-city are:

*Section 2 (1) ‘No person, excluding a peace officer or any other official or person acting in terms of the law, shall*

*(a)when in a public place –*

*(i) intentionally block or interfere with the safe passage or free passage of a pedestrian or motor vehicle; or*

*(ii) intentionally touch or cause physical contact with another person, or his property, without that person’s consent.”*

*(b)approach or follow a person individually or as part of a group of two or more persons, in a manner or with conduct, words or gestures intended to or likely to influence or to cause a person to fear imminent bodily harm or damage to or loss of property or otherwise to be intimidated into giving money or other things of value.*

*(c)continue to beg from a person or closely follow a person after the person has given a negative response to such begging; or*

*(d) block, occupy or reserve a public parking space or a public place in a manner that denies other members of the public from exercising their freedom of movement or use of a public facility.*

1. *Section 2(3) states that no person shall in a public place—*

*(a) use abusive or threatening language;*

*(b) fight or act in a riotous or physically threatening manner;*

*(c) urinate or defecate, except in a toilet;*

*(d) bath or wash himself or herself, except—*

*(i) in a bath or shower; or*

*(ii) as part of a cultural initiation ceremony in an area where such a ceremony is taking place;*

*(e) spit;*

*(f) perform any sexual act;*

*(g) appear in the nude or expose his or her genitalia, except where designated by the City as areas where nudity is permitted, provided that this shall not apply to children below the age of seven;*

*(h) consume any liquor or drugs;*

*(i) be drunk or be under the influence of drugs;*

*(j) solicit or importune any person for the purpose of prostitution or immorality; (k) engage in gambling;*

*(l) start or keep a fire, except an official or person duly authorised to do so or acting in terms of the law or in an area designated by the City to do so; or*

*(m) sleep overnight or camp overnight or erect any shelter, unless in an area designated for this purpose by, or with the written consent of the City, provided that this shall not apply to cultural initiation ceremonies or informal settlements.*

1. *Section (3) provides: “No person shall in a public place –*
2. *cause or permit to be caused a disturbance by shouting, screaming, or making any other loud or persistent noise or sound, including amplified noise or sound.”*

***Laws or regulations that allow the detention or imprisonment of individuals who are unable to pay the fine imposed for petty offences.***

1. The Western Cape, City of Cape Town By-Laws relating to Streets, Public Places and The Prevention of Nuisances, 2007 provides for the enforcement powers of authorised officials in terms of the By-Law and states in Section 22A that
2. An authorised official may, for the purposes of enforcing this By-Law
3. direct a person who is in contravention to—

*(i)stop the conduct prohibited under the By-Law;*

*(ii) remove any obstruction to the safe or free passage of a pedestrian or motor vehicle; or*

*(iii) leave and remain out of a specified public place;*

*(b) issue a written compliance notice on a person contravening the By-Law, which must include the following:*

*(i) describe the conduct constituting a contravention of the By-Law;*

*(ii) indicate the section of the By-Law contravened;*

*(iii) specify the steps to be taken to comply with the notice;*

*(iv) specify the time periods within which the steps have to be taken;*

*(v) state that the failure to comply with the compliance notice constitutes an offence in addition to the contravention of the section contemplated in subparagraph (ii); and (vi) state that, in the event of non-compliance, that person will be liable for a fine for both the contravention and for not complying with the compliance notice and state the amount of the fine;*

*(c) issue a notice in terms of sections 56 or 341 of the Criminal Procedure Act, 51 of 1977 if—*

*(i) a person contravenes a provision of the By-Law; or*

*(ii) a person fails or refuses to comply with a direction in terms of paragraph (a) or a compliance notice in terms of paragraph (b);*

*(d) subject to subsection (2), arrest a person, who commits an offence in terms of the By-Law, in terms of section 40(1)(a) to (f), (h) and (j) of the Criminal Procedure Act, 51 of 1977 and, if necessary, search the person arrested in terms of section 23 of that Act;*

*(e) impound, in accordance with the City's Standard Operating Procedure on the Impoundment of Goods and Animals, 2012, any materials used in making of transient shelter or camping overnight and personal items of persons arrested in accordance with subsection (2); or*

*(e) require any person to furnish their name and address and other particulars that are required for identification or for any process if the official reasonably suspects this person of having committed an offence in terms of this By-law or, if in the opinion of the officer, that person is able to give evidence in regard to the commission of any such offence.*

1. *Section 22A (2) states that the power to arrest in subsection (l)(d) may only be exercised in respect of a contravention of section 2(3)(m) if the person refuses to accept an offer of alternative shelter and goes further in Section 22A (3) that in exercising any power under this section every authorised official must—*

*(a) exercise their powers reasonably with due regard to every person's fundamental rights under Chapter 2 of the Constitution;*

*(b) ensure if force is required under the circumstances, the level of force is justifiable and proportional; and*

*(c) in the absence of an authorised official contemplated in subsection (4), take steps to prevent any other authorised official from exercising powers in contravention of subsections (a) and (b).*

*(4) The authorised official in charge must intervene and take the necessary steps to curtail any unreasonable exercise of powers or* *disproportionate use of force by any other authorised official under the command of that official.*

**Information about attempts made or planned to decriminalize street vending, informal business activities, sex work, begging, eating, sleeping or performing personal hygienic activities in public places.**

State efforts to decriminalise sex work

Local government level

1. The City of Cape Town has made no attempts to decriminalise homelessness, poverty or sex work. Instead, they continue to discriminate against women who are unhoused. Our experience has been that these laws are applied in a discriminatory manner where particularly women of colour and persons with diverse SOGIESC are targeted in the implementation.
2. The City of Cape Town has proposed an amendment to its Streets, Public Places and the Prevention of Noise Nuisances Amendment By-law and invited the public to comment on the proposed amendments between 17 April 2020 and 17 May 2020.
3. The proposed amendment is on s22 of the by law which speaks to the cost and recovery allowed for by the City and proposes amendments specifically in relation to the powers of law enforcement officials which allows for the following:

The power to enter and search any business, premise or vehicle without a warrant or question any person found on such premises if the authorised official has reasonable grounds for believing that a provision of this By-law has been contravened;

The power to instruct a person who is in contravention of this By-Law to leave and remain out of an area where a contravention of the By-law;

The power to serve a written notice on a person if there are reasonable grounds for believing that the person is in contravention of this By-Law or where there has been an allegation that the person has contravened a provision of this By-law;

Impound items, goods, equipment, vessels or vehicles without a warrant if the officer has reasonable grounds to believe that there is a commission of an offence in terms of this By-Law and where perishable goods are impounded by the City they may resell or dispose of them if deemed to be unfit for human consumption.

1. The city has stated that the purpose of the proposed amendments aims to add and streamline procedural aspects of the By-law that support and enable necessary law enforcement, including, effectively resolving complaints and situations relating to noise, and reducing risk to the City, individuals and land owners by ensuring that these processes/actions are supported by legislation.

Possible decriminalisation advances through litigation:

1. Proceedings have been launched before the Equality Court focused on the implementation of the City of Cape Town By-law Relating to Streets, Public Places and the Prevention of Noise Nuisances as well as the City of Cape Town Integrated Waste Management By-law by seeking relief which recognises that the implementation of these by-laws amounts to unfair discrimination against the applicants and all unhoused persons in Cape Town.
2. The applicants have brought a separate yet linked application in the High Court seeking the declaration that the City of Cape Town (‘the City’) By-law Relating to Streets, Public Places and the Prevention of Noise Nuisance, 2007 (“the Streets By-law”) violates sections 9, 10, 12(1)(a) and (e), 14, 21(1) and (3), 25(1), and 26(1) and (3) of the Constitution, and is unconstitutional and invalid, to the extent that sections 2 and 22(2) read with section 23 of the Streets By-law prohibit and criminalise the conduct of street people in a public place.
3. The matter will be heard before the Western Cape High Court at the end of October 2023. The WLC has been admitted as friends of the Court to highlight the specific impact that ongoing criminalisation of poverty through the municipal by-laws are having on unhoused persons in Cape Town.

Ongoing advocacy efforts by civil society organizations

1. The WLC has since 2008 worked very closely with sex workers and allies who provide services and promote human rights for sex workers in South Africa, the African region and internationally. Our expertise on the rights of sex workers includes litigation to recognise the rights of sex workers under our labour law framework in the case of Kylie v The CCMA[[4]](#footnote-4) and facilitating a law clinic for six years that provided direct legal services to sex workers in Cape Town as well as Johannesburg. We have represented a coalition of organisations and individual sex workers in a complaint to the Commission for Gender Equality against the South African Police[[5]](#footnote-5).
2. The advocacy efforts to the Commission for Gender Equality holds a Constitutional mandate in terms of Chapter 9 of the Constitution to uphold and strengthen efforts in the country towards achieving substantive gender equality. The Commission for Gender Equality has conducted an rights based analysis and have adopted a position in favour of decriminalisation of sex work in South Africa[[6]](#footnote-6).
3. The National government has since 2001 been investigating the possibility of the decriminalisation of sex work. The South African Law Reform Commission commenced a process of investigating the regulation of what they called adult prostitution in South Africa. They established Project 107 which has produced various reports on the issue. Of concern has been the length of time that the investigation took, the change of staff and approach and the inconsistent report and contradictory final recommendations which were made.
4. The process culminated in a Discussion Paper that recommended that sex work not be decriminalised[[7]](#footnote-7). The report ignored the evidence placed before it and took a moralistic view on sex work as a profession.
5. It took years before in November 2022 the Department of Justice and Constitutional Development released for public comment a Draft Bill[[8]](#footnote-8), which sought to decriminalise sex work without any further regulatory framework requirements. The Draft Bill sought to repeal sections of the Sexual Offences Act 23 of 1957 and the Criminal Law (Sexual Offences and Related Matters) Amendment Act, 32 of 2007 Comment on the Bill was due in January 2023.
6. The Draft Bill comes after more than twenty years of advocacy by sex workers for the full decriminalisation of the sex work profession in South Africa. Importantly the Draft Bill which sought to achieve decriminalisation of sex work is a key outcome of the National Strategic Plan against Gender Based Violence and Femicide, which was adopted by Cabinet in 2020, and which set 2024 as the date by which to achieve decriminalisation of sex work. The position of the DOJ has been that the Draft Bill will be fast tracked through the parliamentary process to ensure that the deadline of the NSP is met and given that this year will be a short parliamentary year given that it is prior to the run up to the National Elections in early 2024.
7. After comments were received CSO’s were advised that although there was support for the full decriminalisation of sex work amongst the submissions received there was also large opposition to this position, and more was needed in respect of advocacy to ensure the smooth passage of the Draft Bill through the legislature.
8. CSO’s were called to a meeting with the DOJ where they were advised that the Draft Bill would be removed from the Parliamentary timetable for introduction this year. The DOJ advised that they received an opinion from the OSLA that advised that that the Draft Bill in its current form did not meet Constitutional muster and that it could not be certified by the OSLA. The DOJ then sought a legal opinion from Senior Counsel at the Bar which supported the OSLA’s position. They therefore took the decision not to table the Draft Bill but rather consult further internally and prepare a new Draft Bill.
9. There is a strong overall feeling from civil society organisations that the Bill was withdrawn, and the opinions obtained purposefully curtain the progression of decriminalisation, because of political interference. Whether that has been interference because of moral objection or interference because of the content of the Bill and its impact on the upcoming elections in South Africa.
10. The WLC continues to conduct advocacy to create awareness of the rights violations towards sex workers and the need for the decriminalisation of sex work in the country.

**Measures and services available at national, regional, or municipal level to support people living in poverty and in situations of vulnerability from having to resort to begging, sleeping, washing, defecating or performing other hygienic activities in public places, because they lack access to employment, social assistance, adequate housing, public showers and toilets.**

1. The City of Cape Town has established the Street People Reintegration Unit and their safe spaces programme which seeks to provide shelter opportunities to unhoused persons and eventually facilitate their reintegration with their families. The amended by-laws further make provision to ensure that unhoused persons are first offered shelter before being removed or fined. This is however far from the lived reality of women who work and are homeless.
2. The UN Special Rapporteur on Violence Against Women its cause and consequences visited South Africa in December 2015. She spent some time in particular in Cape Town and in her report released in June 2016 she identifies specific gaps in the protection of women from violence. Her visit and investigation also found significant under resourcing and availability of shelters and second-stage housing for women who are forced to flee their homes because of violence. At the time of her visit the Department of Social Development indicated that there were only 88 shelters for women who were survivors of gender-based violence. These shelters were mostly being run, funded, and resourced by civil society organisations.
3. These shelters reported only receiving 10% of their funding from government and struggle to provide services to women in need. The report also records that shelters often have policies that are not child friendly and will not accommodate boys older than 7 years of age, children with special needs or women that struggle with drug and alcohol dependency.

**V. LIVED REALITY OF WOMEN WHO ARE UNHOUSED IN SOUTH AFRICA**

1. It is not contentious that South Africa’s particular historical context is one which pointedly used race, religion, morality and class as a guise to justify apartheid. The use of race, religion, morality and class as tools for discrimination and oppression is, with respect, the legacy which the City of Cape Town by-laws continue to entrench in our constitutional democracy. This has been confirmed in our South African courts which have accepted and stated that our particular history has subjected people with diverse SOGIESC to unfair discrimination, prejudice and violence.
2. South Africa remains one of the most unequal societies in the world with black women as the face of poverty, violence and discrimination. Women who are poor and from disadvantaged background and communities are subjected to intersecting forms of discrimination as they face barriers of access to health, sanitation, policing services, adequate shelter and food. These are women found living in the informal settlements along the urban periphery and in the cape flats in the Western Cape.
3. The Western Cape local government has systemically and intentionally continued to drive an apartheid agenda by the manner in which it has created spatial segregation in keeping its City Hub, surrounding areas and Atlantic Seaboard as predominantly white affluent areas while people of colour remain living on the urban periphery and outskirts. It has promoted the gentrification of previously coloured areas to further force persons of colour out of the CBD and push poor people out of the City and its surrounds.
4. The City of Cape Town has used the Streets, Public Places and the Prevention of Noise Nuisances By-Law as a measure of ensuring that people of colour are removed from white and affluent areas in and around the City CBD. Law enforcement officials conduct themselves in a manner which is degrading towards poor people of colour and violate their basic human rights daily.
5. In South Africa explanations for homelessness range from the structural causes of apartheid influences, uncoordinated planning and a lack of coherent socio-economic policies and programmes especially in the Western Cape. The causes are also political, social and economic in nature. Cape Town has its own unique history in terms of displacement of people of colour to the periphery of the city, where they were required to provide labour, but live in abject poverty because of the colour of their skin. Women remain at the centre of this discrimination and suffer multiple forms of discrimination as a result.
6. Many women die at the hands of their intimate partners daily due to domestic violence. They suffer violence and discrimination at the hands of their community because of their sexual orientation and gender identity. In other instances, womxn are stigmatised and ousted from communities because they choose to conduct sex work as a means of income to provide for their families.
7. Most of these womxn who then find themselves living on the street are women of colour who complain about the conduct of law enforcement officials who abuse and harass them, violating their basic rights to human dignity and equality.
8. Through working with sex workers and sex work organisations over the past year, the Women’s Legal Centre has documented vast human rights abuse and violations by law enforcement officials in the Western Cape who purport to act in accordance with the Streets, Public Places and the Prevention of Noise Nuisances By-Law. Women are fined for solicitation when standing on the street or in certain areas known as sex work hotspots and are unlawfully searched. They are specifically targeted because of their race and socio-economic status even when they are not committing an offence as stipulated in the By-Law.
9. Women in their diversity have reported severe harassment and derogatory behaviour by law enforcement officials who swear at them and call them derogatory names and terms because of their gender identity. These women specifically note the difference in treatment they receive from officials when compared to the treatment of people who appear to be gender conforming.
10. There are many reports to date which highlight these violations and harassment on the part of both the South African Police Service and Law Enforcement Officials.

**CONCLUSION**

1. Black women remain the face of poverty, violence and discrimination in South Africa. They experience discrimination based on their intersecting identities of race, gender, sexual orientation and gender identity, socio economic background, nationality and occupation and profession.
2. The City of Cape Town Public Places By-Laws and other municipal laws are used as a tool by local government, to further discriminate against black women who are unhoused and conduct sex work. This conduct goes against the very fabric of our Constitutional dispensation and replicates an apartheid style of governance which saw this group of women as a public nuisance and social ill based on outdated morality laws.
3. This exclusion and discrimination compound the vulnerability of women who are unhoused and increases their experiences of violence in a society in which violence against women is already a second pandemic. In fact, the State which carries the obligation to protect our rights, are the perpetrators of violence against women contributing to the vulnerability women face in society. Where women are a vulnerable group in their experiences and targeting of violence, women who are unhoused and conduct sex work face violence not only at the hands of their intimate partners or clients but also at the hands of law enforcement officials.
4. While South Africa has a Constitutional and democratic imperative which seeks to achieve justice for all, including national and provincial laws in place to deal with access to housing, evictions and spatial planning, these laws fail to provide substantive equality and protection to black women and instead laws are used to further discriminate against unhoused women who live and work on the street.

1. Website: [www.wlce.co.za](http://www.wlce.co.za) [↑](#footnote-ref-1)
2. Constitution of the Republic of South Africa, 1996 [↑](#footnote-ref-2)
3. By-Law Relating to Streets, Public Places and the Prevention of Noise Nuisances, 2007 available at <https://openbylaws.org.za/akn/za-cpt/act/by-law/2007/streets-public-places-noise-nuisances/eng@2022-02-14#:~:text=(1)No%20person%2C%20excluding,contact%20with%20another%20person%2C%20or> [↑](#footnote-ref-3)
4. Kylie v Commission for Conciliation Mediation and Arbitration and Others (CA10/08) [2010] ZALAC 8; 2010 (4) SA 383 (LAC) ; 2010 (10) BCLR 1029 (LAC) ; (2010) 31 ILJ 1600 (LAC) ; [2010] 7 BLLR 705 (LAC) (26 May 2010). [↑](#footnote-ref-4)
5. CGE Investigative report available at <http://cge.org.za/wp-content/uploads/2021/01/Final-Sex-Work-Report.docx-18-December-2017.pdf> [↑](#footnote-ref-5)
6. CGE Official Position Paper on Decriminalising Sex Work in South Africa available at <http://cge.org.za/wp-content/uploads/2021/01/CGE-Decr.pdf> [↑](#footnote-ref-6)
7. South African Law Reform Commission Final Report Project 107 available at <https://www.justice.gov.za/salrc/reports/r-pr107-SXO-AdultProstitution-2017.pdf> [↑](#footnote-ref-7)
8. See call for comments available at <https://pmg.org.za/call-for-comment/1235/> [↑](#footnote-ref-8)