

Report to Community and Protective Services Committee

To: Chair and Members
Community and Protective Services Committee

From: Scott Mathers, MPA, P.Eng
Deputy City Manager, Housing and Community Growth

Subject: Adult Entertainment Body-Rub Attendant Licensing –
Information Report

Date: February 18, 2025

Content Warning: This report includes material discussing gender-based violence and/or sexual violence, which may cause discomfort. The warning applies to the whole report. If you or someone you know requires support, you can contact:

- Anova 24/7 crisis line at 519-642-3000
- Atlohsa Family Healing Services 24-Hour Crisis Line at 1-800-605-7477
- London Abused Women’s Centre at 519-432-2204
- Muslim Resource Centre for Social Support and Integration at 519-672-6000
- Carrefour des Femmes at 1-877-336-2433

City employees can access additional support through People Services.

Recommendation

That, on the recommendation of the Deputy City Manager, Housing and Community Growth,

- a) the following report **BE RECEIVED** for information purposes;
- b) a Public Participation Meeting **BE HELD** at a future meeting of the Community and Protective Services Committee to present an amendment to the Business Licensing By-law to license Body-Rub Attendants.

Summary

While the City of London currently regulates and licenses Adult Entertainment Body-Rub Parlours as a category in the Business Licensing By-law, there are additional regulations that the City can introduce for the purposes of health, safety, and well-being of persons. Current regulations pertain to owners and managers of these businesses, but there is no provision for regulating the attendants.

Linkage to the Corporate Strategic Plan

The Strategic Plan focuses on creating a Safe London for Women, Girls, Gender-Diverse, and Trans People. Strategies in the Plan include providing resources that prevent sexual exploitation and trafficking.

Municipal Act

The *Municipal Act* is the primary statute governing the creation, administration, and governance of municipalities. The *Act* allows municipalities to pass by-laws concerning the health, safety, and well-being of persons. It also grants municipalities the authority to impose restrictions on adult entertainment establishments.

Background

Previous Reports

- Community and Protective Services Committee (CPSC), September 12, 2023: Business Licensing By-law Amendment (Adult Entertainment Body-Rub Parlour) - deletion of 609 Clarke Road location.
- Community and Protective Services Committee, August 23, 2023: Business Licensing By-law Amendment (Adult Entertainment Body-Rub Parlour) – relocation application from 802 Exeter Road to 232 Dundas Street.

General Discussion

Adult Entertainment Body-Rub Parlours are currently licensed as a category within the Business Licensing By-law. Some of the key regulations include:

1. **Licences:** There are two categories of a licence under this Schedule: Adult Entertainment Body-Rub Parlour Operator and Adult Entertainment Body-Rub Parlour Owner. Individuals who act as both owners and operators must be licensed individually for both roles.
2. **Fees:** New licence and renewal fees are required for both Owner and Operator licences, with separate amounts for each. The 2025 owner licence fee is \$3,555, and the operator licence fee is \$146.
3. **Location and Licence Limits:** Body-rub parlours can only operate at specific addresses approved by Council. There are currently five licensed locations.
4. **Application for Licences and Renewals:** Applications and renewals include detailed information about the applicant, including their business structure, personal details, criminal record check, and a floor plan of the premises.
5. **Powers of the Licence Manager:** The Licence Manager has the authority to prescribe operational standards, hours of operation, signage and advertising standards, and record-keeping requirements. The detailed records must include the attendant's full legal name, current address, contact information, two pieces of valid identification, date of birth, and the dates of employment. Owners must ensure compliance with operational standards.
6. **Prohibitions:** It is prohibited to operate a body-rub parlour without a valid licence, to allow unlicensed operators, or permit individuals under 18 years old to enter the premises or provide services.
7. **Proposing New Locations:** New locations for body-rub parlours must meet specific criteria, including distance from residential areas, schools, day-care centers, and places of worship.

Enforcement & Inspections

As part of the licence application process, a new licence application and/or a renewal application initiates a compliance inspection. If necessary, partner agencies (London Police Service, London Fire Department, Middlesex London Health Unit, Ministry of Labour, Immigration, Training and Skills Development) are involved. Throughout the period of holding a licence, proactive random inspections are undertaken. Common infractions include improperly maintained sanitary amenities, inadequate signage, non-functional panic alarms, and inadequate record-keeping. There has been a marked increase in complaints over the past several months regarding alleged unlicensed parlours and active investigations are ongoing. Where necessary, partner agencies are consulted.

Licensing of Body-Rub Attendants

The *Municipal Act* sets out broad authority to pass by-laws respecting various matters including: economic, social and environmental well-being of the municipality; health, safety and well-being of persons; protection of persons and property, including consumer protection.

There are several Ontario municipalities which, in addition to licensing body-rub premises, currently license body-rub attendants: Barrie, Brampton, Burlington, Oshawa, Windsor, Milton, Hamilton, Mississauga, Niagara Region, Toronto, and Vaughan. Some of the regulatory requirements include:

- police record check
- valid identification
- confirmation of medical clearance (free from communicable diseases)
- confirmation of employment status.

Although some of the above regulations currently form the operational regulations in terms of record keeping, there is value in licensing attendants to ensure up-to-date information is provided to the municipality for the municipal purpose of health, safety, and well-being of persons.

What are the next steps?

Civic Administration has begun initial discussions with partner agencies on the municipal purpose and value of amending the current regulations to add body-rub attendants in the Adult Entertainment Body-Rub Licence category of the Business Licensing By-law. The following next steps are recommended:

- **Municipal Scan:** continue to review Ontario municipal licensing regulations to determine best practices.
- **Research and Partner Agency Consultation:** Continue to research existing licence regulations and continue ongoing consultations with partner enforcement agencies.
- **Licensee Consultation:** Initiate consultation with existing licensees.
- **Drafting Regulations:** Develop the regulations in the form of a Business Licensing By-law amendment. This includes defining the scope, fees, and compliance standards.
- **Public Meeting:** Present the proposed amendment at an advertised Public Participation Meeting before the Community and Protective Services Committee.
- **By-law Amendment:** Present outcome of Public Participation Meeting and make further recommendations as appropriate.

Conclusion

The current by-law regulations and requirements for licensed Adult Entertainment Body-Rub Parlours are outlined noting that several Ontario municipalities have enhanced regulations governing body-rub attendants. The proposed review is directly in line with London's Strategic Plan, focusing on creating a safe environment for all individuals. This report is the initial step in outlining the By-law review and consultation process.

**Submitted by: Nicole Musicco
Manager, Licensing, Policy, and Special Operations**

**Reviewed &
Concurred by: Orest Katolyk, MLEO (C)
Director, Municipal Compliance**

**Recommended by: Scott Mathers, MPA, P.Eng
Deputy City Manager, Housing and Community Growth**