



Safety. Equality. Justice.

Sex Work Law Reform Victoria Inc.
(Equality. Safety. Justice)

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Mike Callaghan AM PSM
Banking Code Reviewer
2021 Code Review
PO Box H218
Australia Square, NSW, 1215
By email: submissions@bankingcodereview.com.au

27 September, 2021

Dear Mr Callaghan,

2021 Code Review – Response to Interim Report

Sex Work Law Reform Victoria Inc. (SWLRV) is an independent non-partisan volunteer group led by sex workers, lobbying for the legal rights of sex workers in Victoria.

Thank you for publishing submissions. At the time of writing there are 36 submissions published on the Banking Code Review website. Around a third (31%) of these submissions raised banking discrimination as an issue for small business. Almost one in five of the submissions (19%) addressed the specific concern of discrimination on the part of ABA's member banks against the sex industry.

As small businesses and the challenges they face evolve over time, the Code needs to be updated. Two of the most pressing areas in which the Code fails refer to small business specifically; in Chapter 13 (being inclusive and accessible) and Part 9 (financial difficulty).

Without the term 'small business' being explicitly inserted into all key chapters of the Code, particularly Chapter 13 and Part 9, the Code remains misleading and unhelpful to small businesses.

Your recently published interim report identified its purpose:

'Drawing on the submissions and consultation meetings to date, the interim report draws out some overarching themes and issues surrounding the review of the Code, along with some preliminary observations on these issues.'

Your interim report identified and discussed six main issues with the Code. We note, with disappointment, that a lack of access to banking for small business has not been included in the interim report.

We are disappointed at your interim report's failure to acknowledge the concerns raised by the small business organisations.

Sincerely,

Lisa Dallimore

On behalf of Sex Work Law Reform Victoria Inc.

SWLRV

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6 August, 2021

Dear Mr Callaghan,

2021 Code Review – A perspective from a sex worker organisation

Sex Work Law Reform Victoria Inc. (SWLRV) is an independent non-partisan volunteer group of sex workers, lobbying for the legal rights of sex workers in Victoria.

SWLRV advocates for, amongst other things:

- Increased access to all forms of banking services for sex workers and sex industry businesses

We appreciate this opportunity to contribute to the 2021 Code Review and attach our submission accordingly.

Sincerely,

Lisa Dallimore

On behalf of Sex Work Law Reform Victoria Inc.