


11/4/12.

CONSULTATION ON SEX ESTABLISHMENT
LICENSE DRAFT POLICY.

Dear Sir,

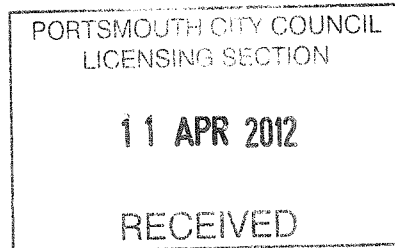
We wish to support the proposed conclusion: that there is no place within the City of Portsmouth for any further sex establishment, as for existing sex establishment, we would support, and encourage the closure of such establishment.

There is no place for them within close proximity to HOMES, SHOPS, CHURCHES AND SCHOOLS, regardless if they comply with laws and policies.

Yours sincerely


Licensing Manager/
Cllr. Terry Hall, P.C.C.
Civic Offices
Guildhall Square,
PORTSMOUTH. PO1 2AH

5 APRIL 2012



Ref. TH/PC

26.3.12

RE:- CONSULTATION ON SEX ESTABLISHMENT
LICENSE DRAFT POLICY

Dear Sir/Madam,

Thank you for sending me details of the above consultation.

Having looked at the draft policy my current opinion is that Portsmouth already provides a varied range of clubs and bars which cater for those looking for late night entertainment such as socialising, drinking & music.

There is no place within the City of Portsmouth due to its density of housing where such a venue would be appropriate. Such an establishment would not enhance Portsmouth's reputation as a city of culture, energy & passion offering access to all for arts, sports & leisure. Such establishments do mean an area.

However, I can see no sustainable reason to object to the existing sex establishment premises continuing to trade provided they comply with the law & other policy considerations but if their leases were to expire then non-renewal would be my option.

Yours faithfully,





Solent Feminist Network

Response to Portsmouth City Council Sex Establishment License Consultation on Draft Policy

April 11th 2012

Who are we?

Solent Feminist Network (SFN) are a group of 250 men and women from across the solent area, including the cities of Portsmouth and Southampton, Havant, Gosport, and other local districts. We are a non-funded community group for networking, sharing concerns and political activism on women's issues. Over the last year our membership has increased by around 90 members as more and more local people become increasingly concerned about feminist and women's issues. If you have any further questions regarding this response, please do not hesitate to contact us on solentfeministnetwork@gmail.com

Consultation responses to questions

1. Do you agree with the council's proposed policy considerations in respect of situations where the grant of a licence would be inappropriate having regard to the use of the premises in the vicinity as set out in paragraphs 7.13 and 7.14 of the draft policy?

YES – It is important that the Local Authority, community and elected members retain the power to make the right decision as to whether a license should be granted, and not be restricted by unsubstantiated threat of legal challenge. Any applicant must be aware that ultimately, the decision to grant a license falls with the local residents and the representatives that they elected. It is important that when taking these decisions, elected representatives are able to consider the sensitive characteristics of an area as outlined in 7.14, but not limited to those listed, but it is important to be aware that any area not featuring a sensitive dwelling is still a vulnerable area, as women and girls of all ages and occupations may find themselves walking through any area of Portsmouth.

2. Do you agree with the council's proposed preliminary conclusion that there is no place within the city of Portsmouth of which it could be said that it was situated in a locality in which it would be appropriate to licence a sex establishment as set out in paragraph 7.10 of the draft policy?

YES – Portsmouth City is a vibrant, densely populated City with many unique features, such as the extensive waterfront and historic areas, maritime history and economic regeneration that has led to an attractive night time economy that all generations can enjoy. It is also a University City and home to many young and vulnerable female students that continue to report anecdotally that they are under increasing pressure to conform to lap dancing culture, and approached by business owners to work in their clubs. Portsmouth has also been tainted in the past by its status as 'Domestic Abuse Capital', and is still home to high levels of domestic and sexual assault. SEVs do not only have an impact on their immediate vicinity, the impact of lap dancing and other 'sex entertainment' is far reaching. It feeds into a culture which normalises the sexual objectification of women and girls, thus creating a cultural backdrop in which violence against women and girls can continue. Due to the geographical nature of Portsmouth, and for many other reasons, there is no place in Portsmouth that is suitable for SEVs. The policy, when adopted, should reflect this, with a

clear cap of 'zero' being set by locality, such as ward, for every locality.

3. Do you think that existing sex establishment premises should be allowed to continue to trade so long as they comply with the law and other policy considerations?

NO – When Portsmouth City Council adopt a Nil Cap, they will be doing so for the protection and safety of women residents and visitors to their city, and to increase the attractiveness of the City for business and leisure opportunities. Existing businesses should be subjected to the same restrictions as any future business looking to apply for a license, and should not be granted 'special exemption' from the new rules.

4. Do you have any other comments to make regarding the draft policy?

A number of members of SFN have reported incidents of sexual harassment and sexual violence occurring to them or their friends as a direct result of lap dancing clubs or other sex venues existing. Although the impact of such clubs may not be immediately obvious, women have experienced negative consequences as a result of partners coming home sexually charged after a night at a lap dancing club and forcing sex onto them, and numerous members have experienced sexual harassment outside or nearby these clubs, as well as in the company of men that have recently visited them. Some members of SFN lodged a report with the police regarding incidents of sexual harassment outside 'Wiggle' which have now been documented on video. We are consistently told that 'there is no evidence to suggest that these clubs harm anyone', yet what these claimants are failing to recognise is the social conditions under which this harassment and abuse occurs, and the factors that limit and completely inhibit women from reporting such incidents to anyone, let alone that there really is no avenue for such complaint, as the police rarely take seriously the issue of sexist harassment.

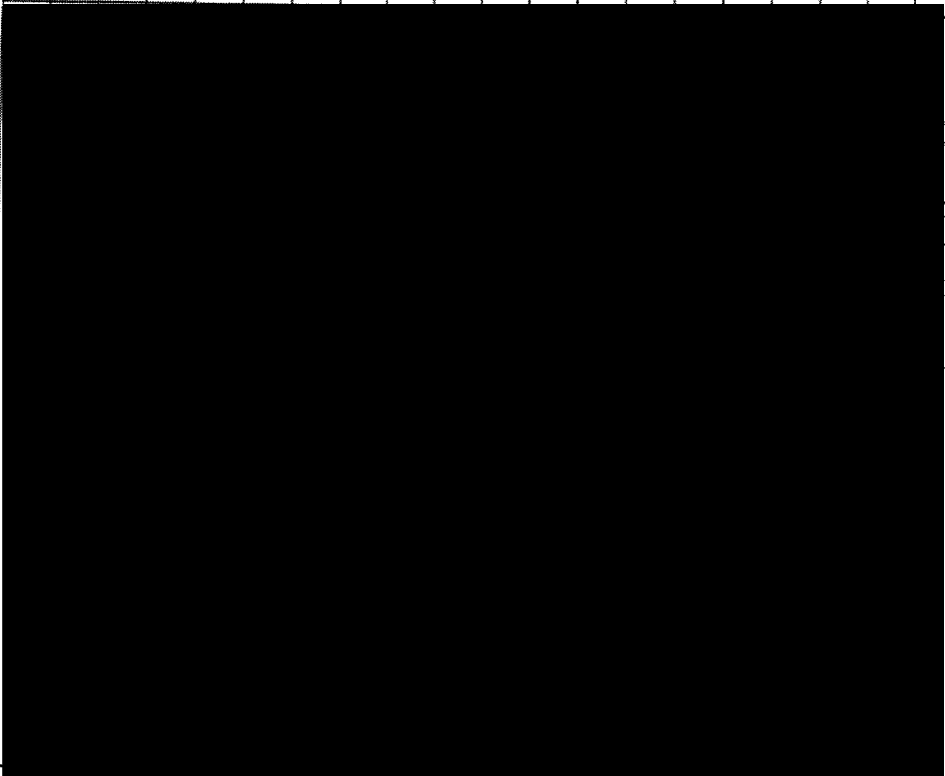


















One suggestion is that these 'legal businesses' should be allowed to continue to operate as 'no reports of misconduct have been reported'. However, when SFN researches testimonies and speaks to former workers of these clubs, the stories are very different, but the women rarely wish to come forward or speak out because of the nature and threat of the people they would be speaking against. The cultural context that women's bodies are being bought and sold under should be considered.

Numerous members of SFN have attended licensing and planning meetings and spoken openly about the sexual harassment and violence they have personally experienced and witnessed, yet these personal experiences are often disregarded. But as soon as a dancer gets up to speak, under the watchful eye of her employer, any notion of the requirement for 'evidence to support their claims' is immediately disregarded.

It is false that groups that challenge sex entertainment do so for 'moralistic reasons', when this could not be further from the truth. SFN would like to reiterate that all of our responses are made on the basis of Equalities, Human Rights and Community Engagement.

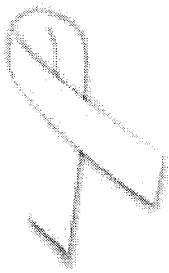
The threat of redundancy is being used as the main reason to save SEVs in Portsmouth. SFN understands that the jobs that these SEVs create are, for the main part, self-employed positions with no terms and conditions, no sick pay, annual leave, and with 'house fees' and 'house fines' in operation. Women that work in these establishments last an average of 2 years in employment because they are no longer considered 'sexually attractive enough' or 'varied enough' to keep customers happy. And many women are left with low self-esteem and angst towards men after working in these clubs, and much less money in their pocket than they are made to believe they will earn. These jobs are not sustainable for women, and the short term consequences of a few job losses should not prohibit the Council from implementing measures which act as long term benefit to women and communities in Portsmouth.

Petition for Nil-Cap on Sexual Entertainment Venues in City of Portsmouth

NAME	EMAIL/CONTACT	SIGNATURE
JAGHILL BRUNS		
JACK SANDS		
AKASHAD KANDARI		
DANNY POSTUNG		
Tade Groves		
EMURK HANUO		
Stene Colwell		
WDonoghue		
Jess Davis		
KIM SNOTER		
James Newman		
AURIA NOBLE		
ANDREW CLARK		
Carl Rees		
John Devereaux		
Cap Ross		
KAREN BRAND		
MELISSA REEDS		

Petition for Nil-Cap on Sexual Entertainment Venues in City of Portsmouth

[illegible]



Portsmouth White Ribbon Group

Hosting Organisation: Aurora New Dawn
Tel: 023 9247 9254

Portsmouth White Ribbon Group is a sub-group of the Portsmouth Domestic Violence and Abuse Forum, dealing with publicity and awareness-raising on issues of domestic abuse and violence, gender-based violence and hidden violence throughout the year. The group is currently hosted by Aurora New Dawn, which offers safety, support, advocacy and empowerment to survivors of domestic abuse and sexual violence.

Portsmouth City Council, Draft Sex Establishment Policy

Consultation Response

April 2012

Do you agree with the council's proposed policy considerations in respect of situations where the grant of a licence would be inappropriate having regard to the use of the premises in the vicinity as set out in paragraphs 7.13 and 7.14 of the draft policy?

Yes.

Do you agree with the council's proposed preliminary conclusion that there is no place within the city of Portsmouth of which it could be said that it was situated in a locality in which it would be appropriate to licence a sex establishment as set out in paragraph 7.10 of the draft policy?

Yes.

Do you think that existing sex establishment premises should be allowed to continue to trade so long as they comply with the law and other policy considerations?

No.

Do you have any other comments to make regarding the draft policy?

Portsmouth's White Ribbon Group advocates across the city on issues pertaining to violence against women, gender-based violence and hidden violence, including domestic abuse and violence and sexual violence. As part of our work, we make links between harmful representations of women (in our media and broader culture) and the continuation and perpetuation of violence against women.

The links between objectification, discrimination and violence against women are clearly acknowledged and recognised at a national and international level through the UK's legally binding ratification of the United Nations Convention on the Elimination of all forms of Discrimination Against Women (CEDAW). Portsmouth White Ribbon considers it a central part of our role to advocate for the recognition of CEDAW and its implications for policy as part of our continuing mission to end violence against women.

We believe that Sexual Entertainment Venues (SEVs) are a core part of the culture of objectification described under CEDAW and this forms a central reason for supporting the introduction of the nil cap proposed in the Draft Sex Establishment Licensing Policy (Jan 2012).

We fully support the reasons for introducing the nil cap set out in the policy, particularly:

- That SEVs have no place in Portsmouth's strategic vision for the future (Section 7.9)
- That SEVs have no place in Portsmouth due to the character of the city (Section 7.11)
- That SEVs have no place in Portsmouth due to the size and dense population of the city, which means they are always in proximity to social and public institutions whose visitors and members may be adversely affected by such venues (Section 7.15)

More broadly, the White Ribbon Group holds that SEVs are frequently the cause and catalyst for female residents to feel unsafe in their local communities. Testimonies collected by national advocacy organisation *Object* (which recently testified to the Government's Leveson Enquiry about the harmful representations of women in the media) supports this view, as does personal testimony from individual members of the Portsmouth White Ribbon Group.

For all these reasons – international law, the development of the local economy and regeneration of the city, and the harmful impact on individual local residents – Portsmouth White Ribbon Group supports the nil cap.

In supporting the introduction of the nil cap, White Ribbon would, however, like to make clear that while we view SEVs as harmful to women, we stand in solidarity with, and with support for, the many women and men currently working within the existing SEVs in Portsmouth. We particularly hold concerns for the impact on the loss of SEVs on the women who are employed to dance in these venues and for the men and women who work in other frontline capacities, for example bar staff and cleaners.

Whilst we understand that the introduction of the nil cap does not in and of itself mean that existing clubs will close, we also understand that the nil cap does make their closure possible upon reapplication for their license in the future.

In introducing the nil cap, we would also urge the City Council to recognise the impact of any potential loss of employment to frontline workers within existing SEVs and to offer particular assistance to those affected. We would particularly urge this in the case of the women who dance/strip in existing SEVs in recognition that if Portsmouth introduces the nil cap, these women will be unable to locate similar work elsewhere in the city as a result.

In the event of the introduction of the nil cap, Portsmouth White Ribbon Group would like to work with Portsmouth City Council and our partners in the city to offer a special package of support to any dancers impacted by the nil cap. We are currently exploring the development of a package of support to help any women affected to seek and to find new employment in alternative industries.