

**Humphreys, Nickii**

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**From:** Hindle, Nigel [REDACTED]  
**Sent:** 12 January 2011 14:25  
**To:** Humphreys, Nickii  
**Cc:** Sherrington, Neil  
**Subject:** CONSIDERATION OF ADOPTION OF NEW POWERS TO CONTROL SEXUAL ENTERTAINMENT VENUES - CONSULTATION WITH POLICE

Nickii,

Thank you for providing an opportunity for me to comment.

There is no empirical evidence to suggest that men leave these clubs and then commit offences as a specific response. I believe at this stage the argument against such venues is based more on the general atmosphere that is established around having such venues - drawing intimidating groups of males into a problem area and the denigrating view of woman it establishes. Additionally, by providing 'entertainment' of this nature it could affect males already influenced by alcohol and peer pressure to be aggressive. Of more concern to me is our relatively high domestic violence rates and the potential that SEV's could affect these detrimentally.

Placing three of these venues in the already saturated and problematic Guildhall Entertainment Area would be of concern and would be counter productive to the analytical recommendations to dilute the 'hard core drinking' and 'young male' dominated image of this area to help reduce violent crime.

I believe that the council will need to consult on a Statement of Policy in respect of Sex Establishments. That policy should make clear that the in licensing sex entertainment venues the Licensing Authority will consider the impact of such premises and their operation on the vicinity. This would include: -

- The likely effects of any increased footfall or vehicular traffic
- Any advertising or displays of an erotic or pseudo-erotic nature
- The type of location (residential, commercial, industrial)
- The vicinity of establishments whose patrons are likely to be affected by the operation of the premises
- The proximity of residential premises, including any sheltered housing and accommodation for vulnerable people
- The proximity of educational establishments to the premises
- The proximity of places of worship to the premises
- Access routes to and from schools, play areas, nurseries, children's centres or similar premises in proximity to the premises
- The proximity to shopping centres
- The proximity to community facilities/halls and public buildings such as swimming pools, leisure centres, public parks, youth centres/clubs (this list is not exhaustive)
- The proximity to historic buildings and tourist attractions
- **Localities where the cumulative impact of the venue, taken with other licensed premises or commercial interests, is likely to have an adverse effect on crime and disorder and public nuisance\*\*Key\*\***
- The nature and concerns of any objections received from residents or businesses
- Any evidence of complaints about noise and/or disturbance caused by the premises
- The proximity of other sex establishments

Nigel

PORTSMOUTH CITY COUNCIL  
LICENSING SECTION

14 JAN 2011

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Portsmouth  
CITY COUNCIL

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Licensing Manager  
Portsmouth City Council  
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**COMMUNITY SAFETY**

**Hidden Violence & Abuse**

Floor 3 Core 1-2  
Civic Offices  
Guildhall Square  
Portsmouth PO1 2BY

Phone: 023 92841055

Fax: 023 92

Our Ref:

Your Ref:

Date: 12 January 2011

Dear Nickii

Many thanks for your letter requesting information regarding the Policing and Crime Act 2009 and the council's subsequent decision whether to resolve to adopt these new provisions to control SEV type premises within the city, the Hidden Violence Team within Community Safety would like to respond with the following statements:

We agree with the exemption of objections on moral grounds. It is our opinion that the current premises being licensed in the same way as bars and café's is a social issue and not a moral one. The premises in question have far reaching social impacts and this can get looked over in debates. "Lap dancing clubs are not harmless fun. They are often sites of sexual exploitation, they make sexual harassment seem normal, and they create no-go areas for women and children who feel unsafe walking past them at night. Lap dancing clubs reinforce sexist attitudes, are linked to sexual harassment both in and out of clubs and run counter to efforts to promote gender equality." (Object, Stripping the Illusion)

It could be argued that licensing SEV's at all may contravene the Gender Equality Duty which came into force in England, Scotland and Wales in April 2007 and its requirement for public authorities to "promote equality of opportunity between men and women and eliminate unlawful harassment and sex discrimination." (Gender Equality Duty 2007)

The reality of SEV's and the women who work there is that women pay to work, women must buy club costumes, women give a proportion of their income back to clubs, women pay fines for lateness/ not adhering to the dress codes. In a recent statement

from central government regarding the updating of the Equality Duty the coalition government said: "Equality of opportunity for women underpins our ambition to build a fairer Britain." (Minister for Women and Equalities Theresa May)

In regard to empirical local data on criminality, license breaches and organised crime I will leave my police colleagues to comment on that as it is not information currently collected by community safety.

With regards to the evidence of sexual violence in these premises we do have anecdotal evidence of young women (mainly students) being approached by men outside the current SEV type establishments and being asked to strip or give sexual services, this resulted in a great deal of fear for these women and they were supported subsequently by members of staff from Hidden Violence. Bearing in mind that 3 of the 4 current establishments are very close to student accommodation this is a concerning factor.

Nationally we know there has been research in this area. Julie Bindel a supporter of Portsmouth Sexual Violence and Domestic Violence services, carried out research on behalf of the International Children and Women Abuse studies Unit at Metropolitan University. This research looked at clubs in Glasgow and London in 2004, interviewing everyone involved in these establishments. The results were as follows:

*"In line with the council's equality policy and stand against commercial sexual exploitation, in 2002, Glasgow City Council systematically oppose license applications on the grounds that they 'demean and exploit' women.*

*Lap-dance clubs have come under local authority and police scrutiny. Police forces have conducted a number of investigations into misconduct and criminal activity within lap-dancing clubs during the last eight years.*

*Licensing regulation has proved contentious for law enforcers, members of the public, women's organisations and club owners. There is general agreement that licensing conditions are inconsistent.*

*None of the clubs/pub visited for this study fully adhered to the terms of their licences. Evidence of bodily contact and sexual services being offered and/or requested was noted in some clubs.*

*Approximately half of the customers in Glasgow went to clubs looking for sex. Four (25%) claimed they had had sex with a dancer on the premises."*

We know in the past that two brothels have been closed down in Portsmouth where trafficked women had been forced into working there. Taking into account that this is a port and has easy routes to London the risk factors for women with immigration issues can only be dealt with by adopting the new licensing regulations.

We certainly support the adoption of these powers that would give local people more control over the running of these establishments in Portsmouth. It would enable PCC to ensure certain conditions were part of the license (eg no touching) and help to protect the women that work there. My understanding is that by requiring lap dancing clubs to obtain a Sexual Entertainment Licence a local authority can:

- Prescribe the maximum number of lap dancing clubs that can be established in a particular area. That number can be set at zero.
- Set the cost of obtaining and renewing a Sexual Entertainment License.
- Consider a wide range of factors when deciding whether or not to grant or renew a licence for a lap dancing club. These factors can include:
  - The conditions for women performing in the club
  - The likelihood of financial and/or sexual exploitation taking place in the clubs
  - The detrimental impact lap dancing clubs have on gender relations
  - The impact of lap dancing clubs on women living and working in the area

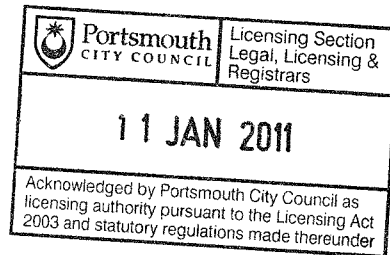
We feel the adoption of these powers will allow local people to have more say in how they wish to see their city develop.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'S Jackson', followed by a small comma.

Sally Jackson  
Manager of Hidden Violence and Abuse Team  
Community Safety  
Portsmouth City Council

Ms N Humphreys  
Licensing Manager  
Legal Licensing & Registrars  
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10 January 2011

Dear Nickii

**FYEO, Oriel House, 21-23 Guildhall Walk, Portsmouth :  
SEV Licensing**

Your letter of 30 December to FYEO Limited at their registered office address has been forwarded to me for response.

Firstly, may I thank you for the courtesy in consulting with my client.

Glenn Nicie is a company director and Chris Knight is the Operations Manager. Both are very active founding members of the Lap Dancing Association, and have been heavily involved in the Government consultation process leading to the legislation. It has always been the Association's view that this additional Licence is unnecessary, and that the Council has sufficient controls (should they be needed) under the Licensing Act 2003. It cites in support of this contention, amongst other things, the Police view voiced through ACPO that well run establishments of this nature (which the LDA members' premises are) cause no problems either themselves or in the area.

The potential for licensing is now enacted, and whilst my clients have nothing to fear from the likely controls to be imposed on any SEV Licence, they continue to have serious concerns about the legislation which appears to be in clear breach of Human Rights. Implementation could, even through no fault of or issue with the operator, potentially lead to a loss of licence; curtailment of/threats to the business and considerable additional expense coupled with an inability to plan for the future, with licences being issued for a maximum of one year and with exceptionally limited appeal rights.

My client has always striven to operate at the high standards, and (as your committee is aware) generally offers conditions to ensure that such standards are always maintained. Good operators deplore some of the practices employed and reputations attracted by poor operators. These are generally the smaller operator without the experience or means to control the entertainment. If this legislation is adopted, my client is fearful that this could

give carte blanche to some such operators to have up to 11 entertainments a year without any controls at all. This is because such occasional users are potentially exempt from requiring a SEVL under 2A(3)(b) Schedule 3 Local Government (Miscellaneous Provisions) Act 1982. Unless other licensable activities are offered, it seems that, by virtue of Paragraph 11A (2) Licensing Act 2003, a Premises Licence under the Licensing Act 2003 as "relevant entertainment" is excluded from the regulated entertainment definition of that Act. Not only are no controls exercisable under the 1982 Act but it may be that none are exercisable under the 2003 Act either. It would appear, therefore, that a Council adopting these provisions could find that it has less or no control over the very establishments that may need the control. The same exemption will apparently also apply to premises in respect of which the Council permit a Waiver to the requirement of an SEVL, by virtue of paragraph 11A (1).


It is, of course, entirely a matter for your Committee, but, having regard to the above, my client believes that the rather courageous path taken by Westminster City Council at this time in declining to adopt has considerable merit.

Should your Committee feel that adoption is the appropriate way forward, my client would be most keen to be involved in consultation on any policy regarding the appropriate numbers for any area and/or proposed terms and conditions of SEV Licences, and their grant etc.

Please do not hesitate to contact me should you need any further information, and I shall be grateful if you will kindly let me know the outcome of your Committee's deliberations later this month.

With regards

Yours sincerely



JULIA PALMER

Elegance  
1, Granada Rd  
Portsmouth

Nickii Humphreys  
Civic Offices  
Guildhall Square  
Portsmouth

17 January 2011

Dear Nickii,

Ref Lap Dancing

Lap dancing over the past 10 years has changed dramatically it is now very upmarket and not seedy in any shape or form. The clubs are all seater with waitress service, When gentlemen arrive at the club they are escorted to a table and their drinks order is taken and served.

There is a stage where all dance performances take place, There is also an area set aside for private dances where a dancer will dance specifically for one person. There is no touching allowed and the customers are monitored by our S.I.A. Approved stewards.

Gentlemen do not have to have personal dances and quite a lot do not, they come in to the club just for a few drinks and the stage shows in an environment which is very safe.


There is belief by certain people that lap dancing is degrading for women, I would disagree, From what i see the women actually take advantage of the men. Not one of the girls would work as a lap dancer if they did not want to.

I have been running Elgance for 10 years and in that time we have had very few incidents of trouble or violence, the police have not had to be called to us as many times as they have to most other types of premises. This is bourne out by information released by Manchester police about their call outs to licensed premises. It showed that the top places were conventional nightclubs like 5th Avenue (173) and Opus (162) The least visited were the lap dancing clubs, Fantasy bar (2) long legs (3) Even people like Burger King (87) and Costa Coffee (31) called them more times.

Finally, I am in this trade because i want to be in it. The dancers are in it because they enjoy it and want to be in it. We do nothing that is illegal or immoral and therefore should be left to continue our business as we have for the past ten years. I do not believe that we need more regulation.

Yours sincerely

J.S Ojla



12<sup>th</sup> January 2011

Mrs Nickii Humphreys  
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LICENSING SECTION  
LEGAL & DEMOCRATIC SERVICES

13 JAN 2011

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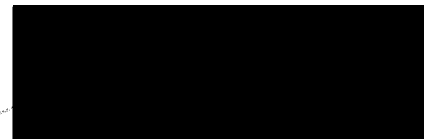
Dear Mrs Humphreys,

**Re: Solent Feminist Network response to SEV consultation**

Please find enclosed the response from Solent Feminist Network to the SEV consultation of January 2011. As part of the appendix, I have enclosed a compact disc. I would be grateful if you could return the disc to me on completion of the consultation. Further copies can be obtained at a charge from [www.object.org.uk](http://www.object.org.uk).

I thank you for giving Solent Feminist Network the opportunity to respond to this consultation.

Yours sincerely,



Charlie Dacke (on behalf of Solent Feminist Network)



**Solent Feminist Network**

response to

**Sex Entertainment Venue**

consultation by

**Portsmouth City Council**

**January 2011**



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## 2. SEV background – our understanding

Following the introduction of the Licensing Act 2003 lap dancing club owners only had to obtain a Premises License to operate their club – exactly the same license that café and restaurant operators require. The result was that it was very easy to open a lap dancing club – and very hard for local residents, equality campaigners, and even the many concerned local authorities to prevent them opening.

Due to the high levels of sexual and financial exploitation found to take place in lap dancing clubs, and the negative impact the clubs have on wider gender relations, in 2008 the leading human rights organisation OBJECT launched the 'Stripping the Illusion' campaign to challenge the myth that lap dancing clubs are just 'harmless fun', joining forces with the Fawcett Society to lobby for a change in the law so that local authorities could impose greater restrictions and conditions on lap dancing clubs – and local people could have a greater say as to whether the clubs should be permitted to open.

Thanks to the efforts of a mass coalition of individuals, MPs and organisations and a 10,000 signature petition that was handed into Downing Street – the campaign to re-licence lap dancing clubs was successful: On 6<sup>th</sup> April 2010 a new law came in to force allowing local authorities to licence lap dancing clubs as 'Sexual Entertainment Venues'.

The Policing and Crime Act 2009 allows local authorities to regulate entertainment broadly defined as live performances and/or displays of nudity provided to an audience for the purpose of sexual stimulation and promoted for financial gain, such as lap, pole and table dancing, and strip shows, as sexual entertainment, requiring that the venues where they take place (including vessels, vehicles or stalls) be licensed as sex establishments (i.e. like sex shops and cinemas – instead of like cafés and restaurants) under an existing piece of legislation. That piece of legislation is Schedule 3 of the Local Government (Miscellaneous Provisions) Act (LGMPA) 1982. (Previously lap dancing clubs were exempt from the LGMPA 1982.)

When licensed under this piece of legislation, a lap dancing club needs a 'Sexual Entertainment Licence' in order to operate. Those lap dancing clubs also need to apply to renew their licence on a regular basis. By requiring lap dancing clubs to obtain a Sexual Entertainment Licence a local authority can:

- Prescribe the maximum number of lap dancing clubs that can be established in a particular area. That number can be set at zero.
- Set the cost of obtaining and renewing a Sexual Entertainment License.
- Consider a wide range of factors when deciding whether or not to grant or renew a licence for a lap dancing club. These factors can include:
  - The conditions for women performing in the club
  - The likelihood of financial and/or sexual exploitation taking place in the clubs



- The detrimental impact lap dancing clubs have on gender relations
- The impact of lap dancing clubs on women living and working in the area

These new measures are 'optional' for local authorities. However, this piece of legislation received cross-party support both in the House of Commons and the House of Lords, and it was backed by the Local Government Association demonstrating a clear need and demand for robust licensing reforms that deliver in terms of local democracy, social justice and equality.

Theresa May, the Home Secretary, spoke about the Big Society in July 2010 at the Women's Aid conference. She stated that:

"It is only when businesses appreciate their responsibility to end the sexualisation of women that some people will stop treating women like objects. And it's only when our communities stand up and say violence against women is unacceptable – that attitudes will really begin to change".



### 3. SEVs: The Gender Equality Perspective

In 2005, the Child and Women Abuse Study Unit (CWASU) at London Metropolitan University were commissioned by Glasgow City Council to review lap dancing and table dancing clubs. The study (<http://www.glasgow.gov.uk/NR/rdonlyres/AF8653FD-9FC4-4DE6-8238-CE629C7D6C3E/0/LapdancingReport.pdf>) concludes that there is evidence that activities within lap dancing clubs are in direct contradiction with equality between men and women, and normalise men's sexual objectification of women.

Having commissioned the review by CWASU, Glasgow City Council made the following statements;

*This Local Authority views table dancing as a form of commercial sexual exploitation which demeans and exploits women and encourages the perception by some men, of women as objects. This runs counter to the Council's aims to promote a city in which all citizens are treated with respect and dignity. Images of women and entertainment which demean and degrade women portraying them as sexual objects plays a part in normalising sexual violence and contributes to male abuse of women being acceptable, tolerated, condoned and excused. Such entertainment runs counter to explicit commitments by a range of private, public and voluntary agencies to promoting women's equality.*

*Abuse and violence against women is now defined broadly and is recognised by governments in the context of promoting human rights and eliminating discrimination in society. It is also recognised that different forms of violence and abuse perpetrated by men are linked to broader gender inequalities and men's abuse of power. The UN General Assembly adopted the following definition of violence against women: "The term violence against women means any act of violence by men that results in or is likely to result in physical, sexual or psychological harm or suffering to women" "It also includes physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work and elsewhere" The Scottish Executive subscribes to this definition and furthermore states that "Violence against women as defined (by the UN above) reflects an imbalance of power between men and women and also more general gender inequalities. Such abuse cannot be eradicated until there is an equal balance between men and women in society and relationships." ...*

*It is the Council's belief that areas, which have sexually oriented businesses, including table-dancing venues, are detrimentally affected through increase in crime and disorder.*

Portsmouth City Council is bound by the Equalities Act 2006, as well as its own policies, to promote equality between men and women and to have due regard to the need to do so.



The gender equality duty is a legal obligation which came into force in April 2007. It was introduced by the Equality Act 2006, which in turn amended the Sex Discrimination Act 1975.

### **Gender equality: general duty**

Under the gender equality duty, all public authorities must meet the general duty, which requires them to have due regard to the need to:

- eliminate unlawful discrimination and harassment
- promote equality of opportunity between men and women

(<http://www.portsmouth.gov.uk/equality/10294.html>).

Local authorities are obliged under the gender equality duties to carry out Equality Impact Assessments (EIAs) because there is a legal requirement to do so in relation to gender (as well as race, disability, sexual orientation, gender identity, religion or belief and age). They are a tool to eliminate institutional discrimination when drawing up policies or proposals which affect the delivery of services, the carrying out of the Council's functions and the employment practice of the authority. To date, no EIA has been carried out on the function of general licensing, or licensing of SEVs at PCC.

You may know that the need to promote equality and act against discrimination is well evidenced by the national and local statistics which demonstrate stark inequalities between men and women and boys and girls within our society<sup>1</sup>.

<sup>1</sup> Around half of women in England and Wales experience domestic violence, sexual assault or stalking in their lifetime (British Crime Survey 2008). 22% of MPs are women. Women working full-time earn on average 16% less per hour than men working full-time and the gender pay gap in the South East it is 23% (ONS 2009 Annual Survey).

· Daily sexualised messages create conducive contexts for violence, reinforce gender inequalities and undermine information campaigns about healthy sexual relationships (Home Office VAWG Consultation, 2009). Mainstream media are pushing a set of norms that undermine women's control over their own sexuality whilst purporting to represent a liberalisation of sex and women's sexual expression. Such representations serve to value females primarily for their 'sex appeal' rather than creative or intellectual abilities, and in doing so reinforce gender inequality. There is a clear link between the consumption of sexualised images and the acceptance of aggressive attitudes and behaviours as the norm (Home Office, 2010)

· "Exposure to the sexualised female ideal is linked with lower self-esteem, negative moods and depression in young women and girls. Adolescent girls exposed to adverts featuring idealised women have significantly higher State Depression scores; and frequent exposure to films, TV and music videos featuring idealised images is linked to lower self-esteem (particularly among Black and Latino young people), stress, guilt, shame and insecurity." (Home Office, 2010)

· A considerable proportion of young women's aspirations have been reduced to being glamour models and lap dancers (EVAW 2008); Women in Journalism (2007); Girls' Schools Association (2010).



#### 4. SFN recommendations

**Recommendation 1 - Immediate adoption of the new measures** to strengthen the licensing of lap dancing clubs and other sex entertainment venues within Portsmouth City. It is now essential that the negative impact on women, and on women's equality – made by SEVs, is taken into account. This impact is both general – in its contribution to the normalising of the sexualisation of women which erodes women's equality – and specific in that:

- “lap dancing and exotic dancing clubs make women feel threatened or uncomfortable” (Royal Town Planning Institute Guide on Gender and Spatial Planning <http://www.rtpi.org.uk/download/3322/GPN7.pdf>)
- psychological trauma, substance abuse and sexual assault are rife among women who work in SEVs (e.g. Holsopple: 100% of 18 women interviewed had been sexually assaulted by customers). See also Appendix II and <http://www.object.org.uk/index.php/lapdancing-testimonies>

We are confident that any gender impact assessment of the operation of SEVs will demonstrate unmitigable negative impact. **Therefore in order to eliminate the negative impact of SEVs the appropriate number to be set should be nil.**

**We recommend that the Council, in recognition of its legal obligations, formally designates gender equality as a specific licensing objective which will underline its commitment under law to advance gender equality and to eliminate discrimination and harassment.**

The implementation of a nil cap policy is by far the most effective and unchallengeable way to meet gender equality objectives. It is also the most efficient. **As a nil cap is not challenge-able by appeal** it is the best way to ensure that PCC does not use its resources on legal costs resulting from an appeal.

**Recommendation 2 - Existing premises must re-apply for their new license within 12 months** of the adoption date of the new legislation. We do not think that the council should under any circumstances agree to licence a SEV. However we are mindful that Philip Kolvin QC, Chairman of the Institute of Licensing, has produced a set of suggested conditions for application to SEV licences. **In the event that a nil policy is not adopted**, or its adoption is delayed, we support his recommendations;

- No contact between performers and audience and a minimum of 1 metre separation between performers and audience
- Performers confined to stage area
- Prevention of filming performers
- Zero tolerance policy on customers who break rules of conduct. Contravention



Appendix I - Joint statement of support (enclosed in pack, not available with electronic copy, please see [http://www.object.org.uk/files/Joint%20Statement%20of%20support%20for%20councils%20to%20set%20a%20nil%20limit%20on%20SEVs\(7\).pdf](http://www.object.org.uk/files/Joint%20Statement%20of%20support%20for%20councils%20to%20set%20a%20nil%20limit%20on%20SEVs(7).pdf))

Appendix II - DVD 'Stripping the Illusion: The lap dancing industry exposed' (enclosed in pack, not available with electronic copy, please see <http://www.youtube.com/watch?v=-ZtP3u2PxZo> and [http://www.youtube.com/watch?v=je\\_8pTgpepU&feature=related](http://www.youtube.com/watch?v=je_8pTgpepU&feature=related))

If possible, please return to Solent Feminist Network on completion of the consultation.

# Appendix 1

This is a statement from the **leading violence against women, women's and human rights organisations in the UK.**

We strongly recommend introducing a '**nil**' policy for **Sexual Entertainment Venues**<sup>1</sup>, as permitted under Schedule 3 of the Local Government (Miscellaneous Provisions) Act (LGMPA) 1982 and amended by Section 27 of the Policing and Crime Act (PCA) 2009.

Outlined below are reasons why a nil limit on lap dancing clubs is a crucial measure to **combat the spread of commercial sexual exploitation** and to **take a stand against the sexual objectification of women, male violence and all forms of inequality between women and men.**

## 1. Lap dancing clubs normalise the sexual objectification of women and run counter to efforts to promote equality between women and men.

The lap dancing industry is highly gendered, with men paying women to strip for them in the vast majority of lap dancing clubs - otherwise known as 'gentlemen's clubs'. The gendered nature of the industry makes the proliferation of lap dancing clubs relevant to the **Gender Equality Duty 2007**. This makes gender equality a factor which should be considered during licensing process.

The ever-increasing sexual objectification of women, facilitated by the expansion of lap dancing clubs, runs directly counter to efforts to achieve equality between women and men.

The links between objectification and discrimination and violence against women are recognised at the international level by the legally binding **United Nations Convention to Eliminate Discrimination Against Women** (CEDAW), which has repeatedly called on states – including the British Government - to take action against the objectification of women<sup>2</sup>. Similarly the UK-based **End Violence Against Women coalition** has called on the UK Government to tackle the sexual objectification of women and girls because it provides a 'conducive context' for violence against women<sup>3</sup>.

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<sup>1</sup> SEVs are defined as "any live performance or live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of an audience (whether by verbal or other means)." An audience can consist of just one person (e.g. where the entertainment takes place in private booths). It is stated in the Home Office guidance that while local authorities should judge each case on its merits, SEVs would apply to the following forms of entertainment as they are commonly understood: **Lap dancing; Pole dancing; Table dancing; Strip shows; Peep shows; Live sex shows:**  
<http://www.object.org.uk/files/SEV%20HO%20Guidance.pdf>

<sup>2</sup> 1979 Convention on All Forms of Discrimination Against Women (CEDAW) Article 5

<sup>3</sup> Realising Rights, Fulfilling Obligations: An Integrated Strategy to End Violence Against Women (EVAW) 2008

The more it becomes acceptable to view and treat women as sexual objects, the easier it becomes to disrespect women as a group. As stated by Chris Green, Director of the **White Ribbon Campaign**<sup>4</sup>: "*Any expansion of lap dancing clubs feeds an increase in the lack of respect for women*".

Research into **male motivations for visiting strip clubs** found that men went to strip clubs to meet women who were willing to act in more 'traditional' ways, and that they wanted a place to 'let frustration out' at the ways in which they had been forced to monitor their behaviour towards women in the workplace because of equal opportunities and sexual harassment legislation<sup>5</sup>.

In this way, lap dancing clubs represent one of the last bastions of male privilege - a place that time forgot in relation to society's efforts to achieve equality between women and men.

Recent **sex discrimination law suits** against corporate use of lap dancing clubs, and **top business women in *The Economist***<sup>6</sup> blaming corporate strip club culture for the lack of female representation at high levels of business demonstrate the negative impact that lap dancing clubs have on women's equality in wider society.

The *Sexism in the City* campaign spearheaded by the **Fawcett Society**, the UK's leading campaign for women's rights, further highlighted the links between lap dancing and gender inequality as it called on businesses to take a stand against the 'sex object culture' that lap dancing clubs promote as a crucial measure to achieve equality between women and men in the work place<sup>7</sup>.

## 2. Lap dancing clubs promote 'sex object culture' which negatively impacts on aspirations of young women and girls.

The growth of lap dancing clubs has fed into what has been termed 'sex object culture' – the mainstreaming of the sex and porn industries and the ever-increasing sexual objectification of women and girls. With lax licensing laws leading to the number of lap dancing clubs doubling over the last five years, and a PR makeover branding lap dancing as glamorous and 'harmless fun', we have found ourselves in a situation in which major retailers sell pole dancing kits along with pink frilly garters and paper money in their 'toys and games section'<sup>8</sup>, and leisure centres offer pole dancing lessons to girls as young as twelve<sup>9</sup>.

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<sup>4</sup> The White Ribbon Campaign works with men to end violence against women

<sup>5</sup> Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

<sup>6</sup> Jeffreys, S. (2008b) 'The Sex Industry and Business Practice', Seminar: School of Business, Ballara University, 21 May 2008

<sup>7</sup> <http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf>

<sup>8</sup> Eden, I. (2007) *Inappropriate Behaviour: Adult Venues and Licensing in London*, London: The Lilith Project, Eaves Housing for Women.

<sup>9</sup> BBC News Online (2006), 'Children are Taught Pole Dancing' Tuesday, 12 December 2006, url: <http://news.bbc.co.uk/1/hi/england/tyne/6173805.stm>

Worryingly, this has led to **25% of teenage girls seeing being a lap dancer as their ideal profession**<sup>10</sup>.

### 3. Lap dancing clubs encourage demand for prostitution and trafficking

According to the **UN**, lap dancing has played an important role in the diversification of the commercial sex industry, which has normalised and encouraged ideas of male entitlement and demand<sup>11</sup>.

The structural conditions of lap dancing clubs mean that women are not paid - they pay to work - and that there are always more women than there are customers. Dancers are therefore forced to compete with one another for private dances in order to earn a wage. Research shows this leads men to expect and demand extra sexual services and it puts pressure on dancers to offer sexual services in order to attract customers<sup>12</sup>. According to an **ex-lap dancer**: *'No touching, not exposing your genitals, not allowing men to touch you is the exception rather than the rule'*<sup>13</sup>

Further research shows that strip clubs **increase demand for nearby on-street and off-street prostitution services**<sup>14</sup>, with a clear link between increased demand for the buying of sex and **women and children being trafficked** in order to meet this demand<sup>15</sup>.

More directly, anti-trafficking and prostitution organisations in the UK have been highlighting the issue that **lap dancing clubs are used by traffickers to 'hide' women trafficked into prostitution**, or to bribe them for good behaviour since<sup>16</sup>:

*"Her pimp would tell her that if she was less 'difficult', he would take her to a lap dancing club in Haringey instead. He still expected her to sell sex in the lap dancing club... she believes that there was no doubt that the owner of the club was fully aware that prostitution was taking place in his premises."*<sup>17</sup>

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<sup>10</sup> [http://www.manchestereveningnews.co.uk/news/s/161/161338\\_naked\\_ambition\\_rubs\\_off\\_on\\_teen\\_girls.html](http://www.manchestereveningnews.co.uk/news/s/161/161338_naked_ambition_rubs_off_on_teen_girls.html)

<sup>11</sup> UN.GIFT (2008) 'Demand for Forced Labour and Sexual Exploitation: How and Why it fuels Human Trafficking' in *The Vienna Forum Report: A Way Forward to Combat Human Trafficking* New York: United Nations. url: <http://www.ungift.org/docs/ungift/pdf/vf/ebook2.pdf> (last accessed 28/08/08)

<sup>12</sup> Bindel, J. (2004) *Profitable Exploits: Lap Dancing in the UK*, London Metropolitan University, Child and Women Abuse Studies Unit (CWASU)

<sup>13</sup> 'Elena' quoted in 'I was an Object, not a Person, The Guardian 19.03.08

<sup>14</sup> Coy, M, Horvath, M & Kelly, L (2007) *It's just like going to the supermarket: Men talk about buying sex in East London* London: Child and Woman Abuse Studies Unit

<sup>15</sup> Anderson, B. and O'Connell Davidson, J. (2003). 'Is Trafficking in Human Beings Demand Driven? A Multi Country Pilot Study' *International Organisation for Migration Research Series*, No. 15. December 2003 url:

<http://www.compas.ox.ac.uk/about/publications/Bridget/Anderson04.pdf?event=detail&id=2932>

<sup>16</sup> Eden, I. (2007) *Inappropriate Behaviour: Adult Venues and Licensing in London*, London: The Lilith Project, Eaves Housing for Women.

<sup>17</sup> DICKSON, S. 2004. *Sex in the City*. London: The POPPY Project

#### 4. Physical and sexual violence and assault against women are common in lap dancing clubs

Researcher Kelly Holsopple, who herself worked in stripping for thirteen years, conducted a study into women's experiences of violence in strip clubs<sup>18</sup>. She found **100 per cent of the women** she surveyed had **experienced physical abuse while working in a lap dancing club**, which variously included being bitten, slapped, pinched, or punched. **All of the women had also been sexually assaulted in clubs**. This ranged from having their breasts grabbed to men attempting and succeeding to penetrate them vaginally with fingers and even bottles. **Every woman had been verbally harassed**. The women surveyed also reported that almost all of the perpetrators suffered no consequences for these behaviours.

Studies have further highlighted the psychological toll of a job description which requires 'arousing men, coping with abuse and contempt, deflecting [and] neutralizing potentially dangerous situations while extracting as much money as possible'<sup>19</sup>. This study found that one of the inherent tolls related to lap dancing stems from the commodification of the dancers' bodies and the idea that a woman's worth is related to how she is viewed by clients.

**In the UK, funding has been granted to set up support services for women who have experienced this form of physical, sexual, and psychological trauma as a result of working in lap dancing clubs.**

#### 5. Lap dancing clubs have a negative impact on women's safety in the local vicinity

Research undertaken in the London Borough of Camden found a fifty percent increase in sexual assaults in the borough after the rapid expansion of lap dancing clubs<sup>20</sup>. Personal testimony from women reinforces the idea of a link between the proliferation of lap dancing clubs and increased levels of sexual harassment for women in the vicinity<sup>21</sup>.

The **UK Royal Institute of Town Planning** has further drawn attention to concerns regarding the impact of lap dancing clubs on women in the local areas: '*Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable*'<sup>22</sup>.

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<sup>18</sup> K. Holsopple, 'Strip Club Testimony', Freedom and Justice Center for Prostitution Resources, A Program of the Volunteers of America of Minnesota, 1998.

<sup>19</sup> Barton, B. (2007), 'Managing the Toll of Stripping: Boundary Setting among Exotic Dancers', *Journal of Contemporary Ethnography*, Vol. 36 (5), Morehead State University, Morehead, Kentucky: Sage Publications

<sup>20</sup> Eden, I. (2003) Lilith Report on Lap Dancing and Striptease in the Borough of Camden, London: The Lilith Project, Eaves Housing for Women

<sup>21</sup> See [www.object.org.uk](http://www.object.org.uk) for testimonies

<sup>22</sup> Royal Town Planning Institute (2007), *Gender and Spatial Planning, Good Practice Note 7*, 10 December 2007

Links between the expansion of lap dancing clubs and increased levels of sexual harassment and assault led the **Women's National Commission** to include the need to regulate lap dancing clubs in their **submission to the UN Commission on the Elimination of Discrimination Against Women (CEDAW) 2005**:

*"The use of women in degrading entertainment exacerbates violence against women...lap dancing and similar clubs must be regulated to ensure that local crimes against women do not increase"*

#### **6. Lap dancing clubs have a negative impact on women's safety in wider society**

Lap dancing clubs normalise the representation of women as being always sexually available. This is worrying in light of widespread public opinion that women are in some way responsible for sexual assaults perpetrated against them<sup>23</sup>. The links between the expansion of lap dancing clubs and an increase in the levels of sexual violence have been raised by organisations who work with victims and perpetrators of gender-based violence. For example, as **Chair of Rape Crisis**, Dr Nicole Westmarland reported that lap dancing clubs *'both support and are a consequence of sexual violence in society'*.

Furthermore, in response to research it commissioned into the impact of lap dancing clubs on the city, **Glasgow City Council**<sup>24</sup> stated:

*"Images of women and 'entertainment' which demean and degrade women portraying them as sexual objects plays a part in 'normalising' sexual violence and contributes to male abuse of women being acceptable, tolerated, condoned and excused. Such entertainment runs counter to explicit commitments by a range of private, public and voluntary agencies to promoting women's equality."*

#### **7. Objections to lap dancing clubs are based on issues of equality, not morality.**

The need for policy to be scrutinised in relation to gender equality was recognised by the Government in 2007, with the passing of the **Gender Equality Duty**. The Gender Equality Duty places a legal obligation on public bodies to take out **Gender Equality Impact Assessments** on all policy decisions to ensure that decisions do not have a negative impact on women's equality. Furthermore, the Gender Equality Duty requires public bodies to **actively promote gender equality and work towards countering gender stereotypes**.

Lap dancing clubs promote gender stereotypes and attitudes that say it is acceptable to treat women as sexual objects, rather than real people. They are linked to gender discrimination and sexual harassment both within clubs and in wider society (as demonstrated by recent successes of sexual harassment cases in which use of lap dancing clubs has been recognised as linked to discrimination), and to the creation of

<sup>23</sup> [http://www.amnesty.org.uk/news\\_details.asp?NewsID=16618](http://www.amnesty.org.uk/news_details.asp?NewsID=16618)

<sup>24</sup> Glasgow City Council report on the need for review of licensing legislation in the light of concerns re table dancing  
<http://www.glasgow.gov.uk/NR/rdonlyres/0D19236F-808A-4467-96F7-6A9508C1F312/0/legtablic2.pdf>

no-go areas in the surrounding areas which reduce women's sense of security and entitlement to public space.

Setting nil limits on lap dancing clubs is not about morality, or 'having an issue with sex', it is about ensuring that local councils abide by their legal requirements to promote equality between women and men by taking a stand against an industry which runs directly counter to this goal.

### **TESTIMONIES FROM WOMEN IN LAP DANCING:**

[http://www.object.org.uk/index.php?option=com\\_content&view=article&id=4&Itemid=29](http://www.object.org.uk/index.php?option=com_content&view=article&id=4&Itemid=29)

#### **STATEMENT SIGNATORIES**

The following organisations believe that a nil limit in relation to Sexual Entertainment Venues is necessary to tackle commercial sexual exploitation and to take a stand against the sexual objectification of women, male violence and inequality between women and men:

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|---|--|
| 1. Against Violence and Abuse                       | <a href="http://www.avaproject.org.uk">www.avaproject.org.uk</a>                       |
| 2. Bristol Fawcett                                  | <a href="http://www.bristolfawcett.org.uk">www.bristolfawcett.org.uk</a>               |
| 3. CARE   | <a href="http://www.care.org.uk">www.care.org.uk</a>                                   |
| 4. Cornwall Feminist Network                        |  |
| 5. Coventry Rape & Sexual Abuse Centre              | <a href="http://www.crasac.org.uk">www.crasac.org.uk</a>                               |
| 6. Eaves  | <a href="http://www.eaves4women.co.uk">www.eaves4women.co.uk</a>                       |
| 7. The Fawcett Society                              | <a href="http://www.fawcettsociety.org.uk">www.fawcettsociety.org.uk</a>               |
| 8. Feminist Webs                                    | <a href="http://www.feministwebs.com">www.feministwebs.com</a>                         |
| 9. London Development Education Centre              |  |
| 10. The London Feminist Network                     | <a href="http://www.londonfeministnetwork.org.uk">www.londonfeministnetwork.org.uk</a> |
| 11. Million Women Rise                              | <a href="http://www.millionwomenrise.com">www.millionwomenrise.com</a>                 |
| 12. National Alliance of Women's Organisations      | <a href="http://www.nawo.org.uk">www.nawo.org.uk</a>                                   |
| 13. The Nia Project                                 | <a href="http://www.niaproject.info">www.niaproject.info</a>                           |
| 14. OBJECT  | <a href="http://www.object.org.uk">www.object.org.uk</a>                               |
| 15. Rape Crisis (London)                            | <a href="http://www.rapecrisislondon.org">www.rapecrisislondon.org</a>                 |
| 16. Rape Crisis (Wycombe, Chiltern and South Bucks) | <a href="http://www.wycomberapecrisis.org.uk">www.wycomberapecrisis.org.uk</a>         |
| 17. Respect   | <a href="http://www.respect.uk.net">www.respect.uk.net</a>                             |

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| 18. Scary Little Girls Productions                 | <a href="http://www.scarylittlegirls.co.uk">www.scarylittlegirls.co.uk</a>           |
| 19. Scottish Women Against Pornography             | <a href="http://www.swapcampaign.co.uk">www.swapcampaign.co.uk</a>                   |
| 20. Solent Feminist Network                        | <a href="http://www.solentfeministnetwork.co.uk">www.solentfeministnetwork.co.uk</a> |
| 21. Southall Black Sisters                         | <a href="http://www.southallblacksisters.org.uk">www.southallblacksisters.org.uk</a> |
| 22. Suffolk Rape Crisis                            | <a href="http://www.suffolkrapecrisis.org.uk">www.suffolkrapecrisis.org.uk</a>       |
| 23. UK Feminista                                   | <a href="http://www.ukfeminista.org.uk">www.ukfeminista.org.uk</a>                   |
| 24. UNISON Eastern Region Women's Committee        |  |
| 25. UNISON South East Regional Women's Committee   |  |
| 26. White Ribbon Campaign                          | <a href="http://www.whiteribboncampaign.co.uk">www.whiteribboncampaign.co.uk</a>     |
| 27. Women's Aid Federation of England              | <a href="http://www.womensaid.org.uk">www.womensaid.org.uk</a>                       |
| 28. Womens Rape and Sexual Abuse Centre (Cornwall) |  |
| 29. Women's Support Project                        | <a href="http://www.womenssupportproject.co.uk">www.womenssupportproject.co.uk</a>   |
| 30. Women's Views on News                          | <a href="http://www.womensviewsonnews.org">www.womensviewsonnews.org</a>             |

To sign the statement or for more information please email [anna@object.org.uk](mailto:anna@object.org.uk)