

**Bristol Fawcett response to Sexual Entertainment Venue Policy working group request for information and views.**

Bristol Fawcett, established in 2001, is a Bristol-based organisation whose members support the aims of the Fawcett Society and work at a local level to:

- Raise awareness of Fawcett and the work that Fawcett does
- Campaign and lobby to improve policy and services for women and girls
- Bring an informed gender equality perspective to local decision making bodies.

Our response draws on the views of our membership which includes citizens of Bristol, members who work in Bristol, academics, policy experts and women who work in the front line of service provision to women and girls including those affected by domestic abuse and sexual violence.

We welcome the opportunity to make our recommendations to the working group.

**Recommendations**

*1) What factors do you think the Council should take into account when considering if the numbers of sexual entertainment venues should be restricted in the locality in which premises for which a licence is sought are situated?*

The essential factor to be taken into account is the negative impact on women, and on women's equality – made by SEVs. 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 – and see representations made by Bristol women to applications for lapdancing clubs in Bristol passim)
- 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 [www.object.org.uk](http://www.object.org.uk)'s Stripping the Illusion resource pages and film).

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 is 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.**

*(2) If the council agreed to license a sexual entertainment venue, what conditions do you*

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*think should usually be imposed on the licences (e.g. use of CCTV, signage on the premises, hours of operation, protection of staff)? (comments are welcomed from the perspective of people passing, frequenting and working in the premises)*

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 warrants a lifetime ban from the premises
- Prohibition of private booths
- CCTV coverage of all public areas
- Controls on exterior advertising and signage
- Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting

Hackney's draft policy takes into account the unmitigable negative impact of the visibility of sex entertainment and other sex establishments and we reproduce its wording with which we agree:

Sex establishments are not to be functionally visible to passers by on retail thoroughfares or pedestrian routes. Premises should be at basement level or with a main entrance away from such routes.

In addition we recommend the following:

- A register to be kept of all staff working each night and valid proof to be held on the premises of the age of each of the performers
- No fee to be charged by any club to a performer for working in the club
- Police to be kept informed of any assaults that take place on staff, whether or not the victim wishes to press charges
- No 'smoking areas' to be allowed at the front of clubs to minimise the potential for harassment of women living, working and passing through the area. All smoking areas must be in private areas away from public spaces.
- No advertising allowed in media that is not exclusively aimed at adults – this would exclude local 'family' newspapers for example.

We understand that currently venues that host SE fewer than 12 times a year will be exempt from requiring a licence and this has the potential to put workers at risk because of lack of conditions so it is important that general policy includes statements on the following:

- Frequency: A clear commitment from the local authority and a member of staff specifically tasked to monitor and keep a record of the 'infrequent' performances.

(3) Please describe any impact of any sexual entertainment venues currently operating in the locality in which you reside, travel, work or have other business.

We refer you to representations made by numerous groups, including Bristol Fawcett, and individual women concerning the negative impact of SEVs currently operating in Bristol, in objections passim. There is no mitigation for the feelings of threat, unease and degradation felt by the numerous women who live and work in Bristol and who find the signage and operation of the commercial sexual objectification of women abhorrent and an affront to equality.

### **Sexual Entertainment Venues: the gender equality perspective**

In 2005, the Child and Woman Abuse Study Unit 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/ronlyres/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.

Bristol City Council is bound by the Equality Act as well as its own policies to promote equality between men and women and to have due regard to the need to do so. You will know that the need to promote equality and act against harassment and discrimination is well evidenced by the national and local statistics which demonstrate stark inequalities in our society between men and women, boys and girls<sup>i</sup>.

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.*

*2.1 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.” ...*

*4.1 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.*

*(4) Are there any other general comments that you would like to make?*

- On 11 July 2010 we emailed the Committee and officers with information concerning the development of policy in other local authorities and we consider Hackney Borough Council’s draft policy to be a thorough and fair exemplar in this regard.

<http://mginternet.hackney.gov.uk/mgConvert2PDF.aspx?ID=8504>

- The freedom of a small number of business owners to exploit women<sup>ii</sup> and make money should not take precedence over the freedoms of women and girls to be able to live and work in their city without harassment, intimidation or fear.
- A nil cap will not prohibit licensed premises from operating. The premises will still, under a nil cap, be able to sell alcohol.
- Theresa May, the Home Secretary, spoke about the Big Society in July of this year 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”.
- **We recommend that the policy requires members of licensing subcommittees who wish to sit in hearings of relevance to gender (i.e. SEVs; sex establishments and so on) to have completed up to date basic training in gender equality and equality legislation.**
- **We recommend that, in the absence of legal direction to the contrary, the Licensing Committee maintain a register of interested parties in reference to SEVs, sex establishments and so on, who will be informed by the Licensing Committee when applications are received of potential relevance for gender equality. This will ensure that the Council will be seen to fulfil its obligations to operate in a transparent and accountable manner. (This will not be an onerous**

**obligation as relevant applications are estimated to be up to three or four a year, currently).**

- A core principle underlying much of the work of Fawcett is the principle of equal representation in decision-making, in politics and in public life. While it is true that both men and women have been active in making representations about the negative impact on society of SEVs, it is also true that the majority of those who reflect and take action on the harm of SEVs are women. We submit that the reasons for this are clear: the lived experience of sexual objectification, sexual discrimination, sexual harassment and sexual violence in many women's lives plays a part in the extent to which these issues are given serious consideration and weighed against other interests or values in the context of SEV licensing. Therefore we request and recommend that:
  - **The working party of officers and councillors is at least equally gender balanced**
  - **The policy should make reference to good practice in SEV applications being heard by sub-committees that are at least equally gender balanced.**
- We would be pleased to be invited to send a representative to the session on 6<sup>th</sup> October and would be pleased to assist in any other way.
- We would very much appreciate receiving written reports of any decisions taken pertaining to the recommendations that we have set out in this document.

Bristol Fawcett, 1<sup>st</sup> October 2010

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<sup>i</sup> · Around half of women in England and Wales experience domestic violence, sexual assault or stalking in their lifetime (British Crime Survey 2008). It is estimated that there were 3,490 rapes in Bristol in 2006/7 (Safer Bristol Rape and Sexual Assault Strategy 2008-11). 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 West is 21.5% (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).

<sup>ii</sup> The financial arrangements in place in SEVs normally require dancers to hand over house fees in order to be allowed to dance and the financial incentives are for clubs to admit as many dancers as possible, causing competition and limited earning capacity for individuals.