

McConaghy Julianne

Subject: FW: Objection to license for Spearmint Rhino

From:

Sent: 13 May 2019 22:41

To: licensingservice

Subject: Objection to license for Spearmint Rhino

I wish to object to the license application of Spearmint Rhino, Brown Street, Sheffield.

I understand that there is currently an investigation going on into serious breaches at the club. I trust that if the outcome of this investigation is that breaches did happen then the Licensing Committee will not grant the license.

The strip club business is based on the sexualisation and objectification of women by men.

Licensing Spearmint Rhino not only encourages these behaviours in men, but legitimises them.

Licensing Spearmint Rhino is therefore not conducive to the Council's Public Sector Equality Duty in which they have a duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between the sexes. This duty can not be upheld by granting a license a strip club.

Councillors have the legal ability and right, to refuse Spearmint Rhino a license. The legislation allows for local people to have more say in whether they want strip clubs in their areas, and yet despite the fact that more and more people object every year, these voices continue to be ignored.

I expect the Licensing Committee to refuse this license application.

Sent from [Mail](#) for Windows 10



Virus-free. www.avast.com

McConaghy Julianne

From: licensingservice
Subject: FW: Spearmint Rhino License Renewal

From:
Sent: 14 May 2019 13:26
To: licensingservice
Subject: Spearmint Rhino License Renewal

Dear Councillors

I am writing to object to object to the application for license renewal fro spearmint Rhino at Brown Street in Sheffield.

My objections is on a number of grounds:

- the existence of SEVs is an indicator of the inequalities that exist in our city, and I think that refusing the license would underline the council's commitment to addressing these inequalities
- the council has been ruled against now in 2 judicial reviews on its failure to consider the equality impact assessment in its SEV licensing and policies
- I have concerns about the safety and well-being of the staff in the venue, and I am aware of an ongoing investigation in to breaches of license conditions
- I am proud of Sheffield and its culture, as I'm sure you are. I feel that continued licensing of these premises undermines Sheffield positive culture.
- it is within the council's legal powers to decline a license based on a their preference not to have any in the city.

I hope that on this occasion you will make a decision that is best for Sheffield.

Please can you redact my name from the published objections a which I understand from previous years is circulated as part of the license review.

Yours sincerely

McConaghy Julianne

Subject: FW: Licence objection

From:
Sent: 15 May 2019 08:59
To: licensingservice
Subject: Licence objection

Dear Sheffield City Council,

Please accept this email as official notice of my objection to the application for licence renewal for Spearmint Rhino, Brown Street, Sheffield.

I know that an investigation into serious breaches at the club has allegedly demonstrated there is more sexualised activity occurring than is allowed under the licence parameters. I understand you yourselves are looking into this so should you find that it is so I would sincerely hope the Council does not grant the club a licence.

There are so many reasons to not licence Spearmint Rhino as it amounts, with or without breaches, to approved prostitution entirely for the entertainment of men. The common myth abounding amongst licencing bodies is that **licensing of these venues limits the risk of criminality, such as prostitution and human trafficking, and this is proven to be entirely the opposite.** Albeit from ten years ago, the Metropolitan Police reported increases in rapes and indecent assaults in boroughs where there were newly licenced sexual entertainment clubs (33% and 55% respectively). All research since has upheld these statistics. By way of anecdote, a recent case (2017) in Doncaster of a punter violently assaulting a dancer as she left the club for refusing sex, highlights the problem exactly.

I also understand that Sheffield City Council admitted it failed to prove it had met its duty to consider equality law in a recent out of court settlement following a scheduled Judicial Review, so as a regulator of your own licencing rules, you have acknowledged your lack of awareness in your decision-making. I urge you in the strongest possible terms to understand that the very existence of these venues promotes sexual availability of women to men and reinforces the notion of male sexual entitlement for which, in the twenty-first century, there should be no room. I would remind you of the ruling on gender inequality and ask that you refuse Spearmint Rhino their licence.

Yours sincerely,

McConaghy Julianne

Subject: FW: Objection

From:]

Sent: 15 May 2019 09:07

To: licensingservice

Subject: Objection

Dear Sir/Madam,

I wish to object to the licence application of Spearmint Rhino, Brown Street, Sheffield.

My main concerns are:

- It is totally inappropriate to have a sexual entertainment venue on a university campus. The young people contributing to the vibrant life of our city deserve better.
- allowing this venue to operate paints Sheffield in a poor light locally and nationally. Our city has a history of being forward thinking and making change for good. The presence of this seedy business is not aligned with the vision local residents want for our beloved city
- the council has an opportunity to show local residents that it cares more about our people and our city than about big business. We do not need to accept this poor quality business' demands when it contributes nothing to the culture of our city
- the club has a very bad reputation for treating dancers poorly as employees, and a terrible track record for owning up and taking responsibility for the customers that leave their club and go on to harass and molest people

Further I understand that there is currently an investigation going on into serious breaches of the license. Under these circumstances I really cannot see how the Council could grant the licence.

Best regards,

McConaghy Julianne

Subject: FW: Objection to the licence application of Spearmint Rhino, Brown Street, Sheffield.

From:

Sent: 15 May 2019 09:08

To: licensingservice

Subject: Objection to the licence application of Spearmint Rhino, Brown Street, Sheffield.

To Whom it may concern,

I wish to object to the licence application of Spearmint Rhino, Brown Street, Sheffield.

I understand that there is currently an investigation going on into serious breaches at the club. I trust that if the outcome of this investigation is that breaches did happen then the Council will not grant the licence.

Notwithstanding the possible breaches that may have happened, the strip club business is based on the sexualisation and objectification of women, seeing women as a financial commodity rather than human beings and creating a place where men do not have to consider the thoughts, feelings or consent of women, but can simply buy whatever they want from them. Licensing Spearmint Rhino not only encourages these behaviours in men, but legitimises them. Licensing Spearmint Rhino is therefore not conducive to the Council's Public Sector Equality Duty in which you have a duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between the sexes. I do not believe that the Council has ever explained how licensing Spearmint Rhino ensures that this is happening and I do not believe that it ever can.

The Council has the legal ability and right, to refuse Spearmint Rhino a license, something which the Council does not appear to understand. The legislation allows for local people to have more say in whether they want strip clubs in their areas, and yet despite the fact that more and more people object every year, these voices continue to be ignored.

The council also needs to consider the proximity of the premises to Sheffield Hallam University's Students Union and the potential impact on the wellbeing of students and young people who live and study close by. Spearmint Rhino is an anomaly in the city's cultural quarter.

For all of those reasons given above I expect the Council to refuse this licence application.

Yours faithfully

McConaghy Julianne

Subject: FW: Spearmint Rhino

From:
Sent: 15 May 2019 12:31
To: licensingservice
Subject: Spearmint Rhino

I understand that Spearmint Rhino has applied to renew its licence in Sheffield. I would like to register my objection to this licence renewal.

--
PLEASE NOTE MY NEW EMAIL ADDRESS -

Freelance writer in biopharma, healthcare, business and more

Recd by post 15 May 2019
acknowledged by email 16 May 2019

11 May 2019.

Renewal of Licence for Spearmint Rhine - SHEFFIELD

I object to this establishment on the following grounds

- * It encourages customers to think of young attractive women as "available" for their sexual desires
- * This attitude of customers will spill out onto the surrounding streets, where the general public walk
- * Very close by is the Showroom Cinema trip, which I regularly visit
- * Very close by is the SHU Union bar - busy frequented by young women at all hours
- * Very close by is Sheffield Bus Station - single women travelling through or waiting, at all hours of early morning through to late night
- * Very close by is Sheffield Railway Station - hazard & risk as above

On these grounds I object, based on the security & safety of myself & all other women using the neighbourhood.

McConaghy Julianne

Subject: FW: Spearmint Rhino Renewal Application for Licence

From:

Sent: 15 May 2019 22:40

To: licensingservice

Subject: Spearmint Rhino Renewal Application for Licence

15 May 2019

Licensing Service
Block C, Staniforth Road Depot
Staniforth Road
Surrey Street
S9 3HD

By email to: licensing@sheffield.gov.uk

Dear Licensing

I refer to the application for a Sexual Entertainment Venue (SEV) licence by Spearmint Rhino, 60 Brown Street, Sheffield, S1 2BS.

This is an objection letter to the application for this licence and I call for the council to refuse it.

What follows is a standard letter. I am not in the practice of sending such letters, but this letter expresses perfectly my concerns about this application. My personal experience is this: This venue is next to the Students' Union. Whilst it is true that University students are of the age of majority, many are only just. Whilst legally we treat the age of 18 as a binary cut-off point, in reality we must accept that many are by definition young, inexperienced and are just learning to get to grips with the world. I have attended a few gigs and evening events at the SU. Walking past the Applicant's open premises on my own made me feel anxious, nervous, vulnerable, unsafe. I am 44 years old, and not usually easily cowed. It put me off from attending the venue. I cannot imagine how I would have felt at 18 years old, new to the City, having to walk past that to get to my Students' Union every day – and night. It would have hampered my ability to socialise, to make new friends, to be independent and attend and leave the Union on my own. Arguably, as well as the Council's statutory duties, this is engaging issues about the Union's ability to provide genuinely discrimination free services to it's members. This is also relevant to the nearby colleges nearby

I believe that the Council should refuse the licence application under the Discretionary Grounds for Refusal of the current Sheffield City Council's Sexual Entertainment Venue Licensing Policy on the following grounds:

The Public Sector Equality Duty and Gender Equality

Sheffield City Council has "statutory obligations in relation to disability race and gender" (sic as the protected characteristic under the Equality Act 2010 is "sex" and

not “gender”) ensuring that these factors are not used to discriminate against anyone. I believe that sexual entertainment venues directly discriminate against women by normalising the sexual objectification of women which contributes to their sexualisation and objectification in other areas of society. SEVs are both cause and effect of inequality between the sexes.

The Council has a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty (PSED), including tackling gender inequality. This applies notwithstanding the fact that Parliament has legislated to allow the possibility for SEVs to be licensed in specific areas – subject to the choices of the local communities. Many women have voiced their concerns and fears about the presence of Spearmint Rhino in previous objections.

Philip Kolvin (2010) cites the Royal Town Planning Institute’s *Gender and Spatial Planning Good Practice Note*:

“In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing club make women feel threatened or uncomfortable” [1]

Kolvin continues with:

“If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage” [2].

This is further corroborated by 2012 research published in *Criminal Justice Matters* which states that:

“. . . the women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club.” [3]

Not only do strip clubs appeal to a narrow sector of the community, mostly heterosexual men, they are also antithetical to fostering good relations between the sexes. In their UK study published in 2011 Sanders and Hardy [4] reported that 30% of the women performers interviewed said that as a result of doing the job they had lost respect for men; a finding echoed in many testimonies of former performers, including those who objected to last year’s licence renewal where at the hearing, one former dancer stated “I was viewed and treated like a second-class citizen and not just in one club but in all, this made me hate men to an extreme level, they repulsed me.”[5]

I am sure that I need not remind the the Council of its duty under the Equality Act’s requirement to pay due regard to foster good relations between men and women.

Location

In its current policy, the Council states:

"Whilst the Council has not imposed a numerical limit on the number of premises that may be licensed in any area, and whilst it will treat each application upon its own merits, the Council will not licence premises that it feels are in close proximity to:-

a) a school, nursery or other premises substantially used by or for children under 16 years of age;

There are many educational establishments in the vicinity and Brown Street is also an access route to the Sheffield College Granville Road campus and UTC which provides education for children from the age of 14. It is in close proximity to Freeman College which provides education for students (16 – 25) who have a range of complex learning, mental health and behavioural needs.

The Club is also in the centre of the newly designated "Knowledge Gateway".

b) a park or other recreational area used by or for children under 16 years of age;

There is the recreational space (formerly known as Festival Square but now named as Cultural Industries Quarter Square on the map of the area which can be found on Sheaf Square) directly adjacent to the club.

d) a Hospital, Mental Incapacity or Disability Centre or similar premises;

There are a number of charities and organisations in the area which support vulnerable children and adults, many of whom will have PTSD.

f) a central gateway to the city or other city landmark, historic building or tourist attraction.

It is directly opposite the Showroom cinema, which is "one of Europe's largest independent cinemas paired with the longest-running creative business centre in the city. Housed in a converted 1930s car showroom, we're situated right next to the railway station in Sheffield's Cultural Industries Quarter." And further states that their "beautiful Art Deco environs are an ideal setting for the innovative businesses homed at the Workstation, and a perfect place for the determinedly independent and cutting edge cinema of the Showroom." The Showroom also hosts family events as well as many off the Shelf and Doc Fest events, the latter is internationally renowned.

It is also opposite the newly refurbished Site Gallery, Sheffield's international contemporary art space, specialising in moving image, new media and performance. Spearmint Rhino is not only centrally located in terms of proximity to a number of national and international events locations but it is also a direct access route, for example: Doc Fest; the children's media conference; Off the Shelf etc.

There are young students not only studying in the surrounding the area but also residing in it. The 24/7 Addsetts learning centre is in the vicinity with Brown Street and Cultural Industries Quarter Square as direct access routes from numerous student accommodation blocks. The Club is next to Sheffield Hallam Students Union (an iconic and a city landmark building) and backs directly onto student accommodation. Recent revelations about breaches within the club also make its location within the student community highly inappropriate.

Further grounds for refusal

The Council is asked to note that in the last few years Leeds City Council successfully defended a refusal to renew two SEV licenses at judicial review:

R (Bean Trading A Ltd) v Leeds City Council (2014)

It was held that a council can "take a fresh look" despite no changes to the character of locality. The Council is also asked to note the following from Philip Kolvin regarding licence renewal:

"Given that there is potential for the discretion to be exercised afresh, the renewal should not just be a rubber stamping exercise, but an opportunity, if needed, to review the principle and content of the license."[6]

The case of *Thompson v Oxford City Council (2014)* was also supported at court of appeal, and the Council told they could "take a fresh look" at any application for renewal.

When Philip Kolvin represented residents objecting to the renewal of the strip club in Chester in 2015, it is reported that:

"Their representative Philip Kolvin QC told the meeting that 2009 legislation meant communities now had more say in where such sexual entertainment venues should be located. What Mr Grant had dubbed an 'extraordinary campaign', he called 'the working of democracy'."

It is further reported:

*"But Mr Kolvin pointed out that this year's committee was entitled to come to an opposite conclusion to last year's committee even where nothing had changed: **'The courts have said that you can respond to a body of feeling in the locality, merely the fact that a number of people are concerned about this justifies refusal.'**"* (emphasis added) [7]

Please note that the licence renewal was refused. As such, the Council is fully empowered to refuse the licence, particularly in view of the widespread breaches to conditions, recently reported in the local and national press and presented to the Council in April this year.

I strongly urge you to refuse the application from the Applicant.

I look forward to hearing from you.

Yours faithfully

References

[1] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[2] Patiniotis, J. & Standing, K. (2012) 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres' in *Criminal Justice Matters*, 88:1, 10-12.

[3] Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing p.87

[4] Sanders, T., & Hardy, K. (2011) 'The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings' Leeds: University of Leeds

[5] Sheffield Telegraph: 'Why we want Sheffield to be a strip-club-free city' April 5th 2019 <https://www.sheffieldtelegraph.co.uk/news/why-we-want-sheffield-to-be-a-strip-club-free-city-1-9695166>

[6] Kolvin, P op cit. p. 90

[7] Chester Live: 'Chester Platinum Lounge lap dancing club waits for licensing decision' July 18th 2015 <https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>

McConaghy Julianne

Subject: FW: Objection to the re-licencing of Spearmint Rhino, Sheffield

From:

Sent: 16 May 2019 13:35

To: licensingservice

Subject: Objection to the re-licencing of Spearmint Rhino, Sheffield

Dear Licensing

Objection to the re-licencing of Spearmint Rhino, Sheffield

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license shouldn't just be refused it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils *not* to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Find out more about the law and strip club licensing here: www.notbuyingit.org.uk/StripLegal

Unfit License holder

Independent investigators recently provided **hard evidence of extreme sexual contact and sex acts at Spearmint Rhino Sheffield**. This included performers masturbating themselves, punters and each other; oral sex between dancers; women inserting their fingers into their own vaginas and other women's; women putting their mouths around punters' genitals; women giving out their phone number; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs
 Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny *except* from private lap dances it is also clear that every woman in the club *must* provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' – security guards, house mums, dancer codes of conduct, dancer training etc – are meaningless.

It means that all testimonies by management and staff, given over years, that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

'Improved Regulation' is Meaningless

There is also now hard evidence that whatever 'improved regulation' the council seeks to put in place will also be circumvented. More CCTV, 'panic buttons', 'better training', more 'codes of conduct', 'improved security'? All of this is meaningless.

We know this because similar independent investigation exposed sexual contact as standard in **Manchester's strip clubs**, despite their being equipped with 'panic buttons': www.notbuyingit.org.uk/ManchesterPIs

We know this because sexual contact was also exposed as standard in **Spearmint Rhino's 'flagship' club in Camden**. This has to be the world's most regulated strip club, boasting no fewer than 63 CCTV Cameras – whose footage is always full compliant with club licensing conditions. Likewise, 'secret' spot checks by Camden Council had always suggested the club is fully compliant. Yet, when genuinely secret visits were made by independent investigators they found lap dancers touching punter's genitals; strippers touching and masturbating themselves; lap dancers straddling and grinding on punters: women putting their breasts in punter's mouths: www.notbuyingit.org.uk/CamdenSRPIs

Camden Spearmint Rhino is the most regulated strip club in the country. If licensing conditions are being broken there as a matter of course, they clearly can be broken – and undoubtedly *are* being broken – in every strip club in the UK. **And there is no way to prevent this.**

We know regulation is meaningless, because similar undercover investigations in 2018 exposed sexual contact in the world's most famous strip club, **The Windmill Theatre, and in Ealing's long standing LA Confidential**. The breaches here were far less significant than at Spearmint Rhino Sheffield. Both clubs had their licenses rescinded.

We know all regulation is meaningless because there are now nearly **100 recorded incidences in over 70 strip clubs** of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, *it is how the strip industry operates*: www.notbuyingit.org.uk/Publications#Press

If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a *de facto* brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you *not* to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

030 PI

McConaghy Julianne

Subject: FW: Objection spearmint rhino

From:

Sent: 16 May 2019 13:50

To: licensingservice

Subject: Objection spearmint rhino

Dear Licensing

Objection to the re-licensing of Spearmint Rhino, Sheffield

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I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils *not* to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed. What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

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The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny *except* from private lap dances it is also clear that every woman in the club *must* provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' – security guards, house mums, dancer codes of conduct, dancer training etc – are meaningless.

It means that all testimonies by management and staff, given over years, that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

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We know all regulation is meaningless because there are now nearly **100 recorded incidences in over 70 strip clubs** of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, *it is how the strip industry*

operates: www.notbuyingit.org.uk/Publications#Press

If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a *de facto* brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you *not* to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Yours Sincerely,

ent from Yahoo Mail on Android

McConaghy Julianne

Subject: FW: Objection to the re-licencing of Spearmint Rhino, Sheffield

From:**Sent:** 16 May 2019 14:47**To:** licensingservice**Subject:** Objection to the re-licencing of Spearmint Rhino, Sheffield

Dear Licensing

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license shouldn't just be refused it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils not to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Find out more about the law and strip club licensing here: www.notbuyingit.org.uk/StripLegal

Unfit License holder

Independent investigators recently provided hard evidence of extreme sexual contact and sex acts at Spearmint Rhino Sheffield. This included performers masturbating themselves, punters and each other; oral sex between dancers; women inserting their fingers into their own vaginas and other women's; women putting their mouths around punters' genitals; women giving out their phone number; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable source of information in relation to how this club is really run, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny except from private lap dances it is also clear that every woman in the club must provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' - security guards, house mums, dancer codes of conduct, dancer training etc - are meaningless.

It means that all testimonies by management and staff, given over years, that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

'Improved Regulation' is Meaningless

There is also now hard evidence that whatever 'improved regulation' the council seeks to put in place will also be circumvented. More CCTV, 'panic buttons', 'better training', more 'codes of conduct', 'improved security'? All of this is meaningless.

We know this because similar independent investigation exposed sexual contact as standard in Manchester's strip clubs, despite their being equipped with 'panic buttons': www.notbuyingit.org.uk/ManchesterPIs

We know this because sexual contact was also exposed as standard in Spearmint Rhino's 'flagship' club in Camden. This has to be the world's most regulated strip club, boasting no fewer than 63 CCTV Cameras – whose footage is always full compliant with club licensing conditions.

Likewise, 'secret' spot checks by Camden Council had always suggested the club is fully compliant. Yet, when genuinely secret visits were made by independent investigators they found lap dancers touching punter's genitals; strippers touching and masturbating themselves; lap dancers straddling and grinding on punters: women putting their breasts in punter's mouths: www.notbuyingit.org.uk/CamdenSRPIs

Camden Spearmint Rhino is the most regulated strip club in the country. If licensing conditions are being broken there as a matter of course, they clearly can be broken - and undoubtedly are being broken - in every strip club in the UK. And there is no way to prevent this.

We know regulation is meaningless, because similar undercover investigations in 2018 exposed sexual contact in the world's most famous strip club, The Windmill Theatre, and in Ealing's long standing LA Confidential. The breaches here were far less significant than at Spearmint Rhino Sheffield. Both clubs had their licenses rescinded.

We know all regulation is meaningless because there are now nearly 100 recorded incidences in over 70 strip clubs of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, it is how the strip industry operates:

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If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a de facto brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you not to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Yours sincerely

McConaghy Julianne

Subject: FW: Ex Sheffield Student Against Strip Clubs

From:
Sent: 16 May 2019 15:39
To: licensingservice
Subject: Ex Sheffield Student Against Strip Clubs

Dear Licensing

I appreciate councils need money at the moment, but income for public bodies must be ethical and not from activities that put anyone at risk. Strip clubs exploit women and girls and put other women and girls at risk because of the behaviour and attitudes they foster among men. If the clubs put other groups of people at risk they would be stopped, but because it remains acceptable and normal to put women and girls at risk, authorities fail to do the right thing and ban them. Be brave and apply the same rules you would to racism, ban the clubs and treat everyone with respect.

Objection to the re-licencing of Spearmint Rhino, Sheffield

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license shouldn't just be refused it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils *not* to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh

eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Find out more about the law and strip club licensing here: www.notbuyingit.org.uk/StripLegal

Unfit License holder

Independent investigators recently provided **hard evidence of extreme sexual contact and sex acts at Spearmint Rhino Sheffield**. This included performers masturbating themselves, punters and each other; oral sex between dancers; women inserting their fingers into their own vaginas and other women's; women putting their mouths around punters' genitals; women giving out their phone number; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny *except* from private lap dances it is also clear that every woman in the club *must* provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' – security guards, house mums, dancer codes of conduct, dancer training etc – are meaningless.

It means that all testimonies by management and staff, given over years, that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

'Improved Regulation' is Meaningless

There is also now hard evidence that whatever 'improved regulation' the council seeks to put in place will also be circumvented. More CCTV, 'panic buttons', 'better training', more 'codes of conduct', 'improved security'? All of this is meaningless.

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Camden Spearmint Rhino is the most regulated strip club in the country. If licensing conditions are being broken there as a matter of course, they clearly can be broken – and undoubtedly *are* being broken – in every strip club in the UK. **And there is no way to prevent this.**

We know regulation is meaningless, because similar undercover investigations in 2018 exposed sexual contact in the world's most famous strip club, **The Windmill Theatre, and in Ealing's long standing LA Confidential**. The breaches here were far less significant than at Spearmint Rhino Sheffield. Both clubs had their licenses rescinded.

We know all regulation is meaningless because there are now nearly **100 recorded incidences in over 70 strip clubs** of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, *it is how the strip industry operates*: www.notbuyingit.org.uk/Publications#Press

If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a *de facto* brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you *not* to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Best Wishes

McConaghy Julianne

Subject: FW: Objection to the re-licencing of Spearmint Rhino, Sheffield

From:
Sent: 16 May 2019 18:08
To: licensingservice
Subject: Objection to the re-licencing of Spearmint Rhino, Sheffield

Dear Licensing

Objection to the re-licencing of Spearmint Rhino, Sheffield

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license shouldn't just be refused it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils *not* to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

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Unfit License holder

Independent investigators recently provided **hard evidence of extreme sexual contact and sex acts at Spearmint Rhino Sheffield.** This included performers masturbating themselves, punters and each other; oral sex between dancers; women inserting their fingers into their own vaginas and other women's; women putting their mouths around punters' genitals; women giving out their phone number; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny *except* from private lap dances it is also clear that every woman in the club *must* provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' – security guards, house mums, dancer codes of conduct, dancer training etc – are meaningless.

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We know this because similar independent investigation exposed sexual contact as standard in **Manchester's strip clubs**, despite their being equipped with 'panic buttons':

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Camden Council had always suggested the club is fully compliant. Yet, when genuinely secret visits were made by independent investigators they found lap dancers touching punter's genitals; strippers touching and masturbating themselves; lap dancers straddling and grinding on punters: women putting their breasts in punter's mouths: www.notbuyingit.org.uk/CamdenSRPIs

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If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a *de facto* brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you *not* to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Yours faithfully,

McConaghy Julianne

Subject: FW: For whom it my concern

-----Original Message-----

From:

Sent: 17 May 2019 08:15

To: licensingservice

Subject: For whom it my concern

17th May 2019

Dear one

Objection to Spearmint Rhino Sheffield license renewal.

Please accept this letter as my objection to the Spearmint Rhino, Brown Street, Sheffield license application.

It has come to my attention that there is an ongoing investigation that involves activities at the Spearmint Rhino in our city of Sheffield that, if proven, constitute serious breaches of their license.

Can I understand that if this is indeed the case that you will not be granting a renewal of their license?

I eagerly await your response.

Kind regard

McConaghy Julianne

Subject: FW: Rhino club

-----Original Message-----

From:

Sent: 17 May 2019 09:51

To: licensingservice

Subject: Rhino club

Please stop licensing this club. You are colluding with the exploitation of vulnerable women and encouraging underage sex and trafficking.

Sent from my iPhone

McConaghy Julianne

Subject: FW: OBJECTION to re-licensing of Spearmint Rhino, Sheffield

From:
Sent: 17 May 2019 15:20
To: licensingservice
Subject: OBJECTION to re-licensing of Spearmint Rhino, Sheffield

Dear Sir/Madam

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license should not just be refused; it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been, and as the local area changes, this is only becoming worse. It is in the middle of a University, close to a College for CHILDREN aged 14 and upwards, near Freeman College which provides education for young people with Special Needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own Policy.

The law gives absolute power to all Councils NOT to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. Any strip club operators that have tried to challenge a refusal on these grounds has always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm – even though there is now evidence of overwhelming harm, see below – for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always "look with fresh eyes" at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Unfit License Holder

Independent investigators recently provided hard evidence of extreme sexual contact and sex acts at Spearmint Rhino, Sheffield. This included performers masturbating themselves, punters and each other; oral sex between dances; women inserting their fingers into their own vaginas and other women's, women putting their mouths around punters' genitals; women giving out their phone numbers; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

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The club has been under the same management for years and has clearly been operating in this manner for a long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one-offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny EXCEPT from private lap dances, it is also clear that every woman in the club MUST provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years. This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to “protect performers” and “prevent rule breaches” – security guards, house mums, dancer codes of conduct, dancer training, etc. – are meaningless.

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Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers’ money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it, (as ‘regulation’, no matter how ‘stringent’, is meaningless), outside of it, (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue), or in wider society.

I urge you NOT to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Yours faithfully

McConaghy Julianne

Subject: FW: OBJECTION to Relicensing of Spearmint Rhino, Sheffield

From:

Sent: 17 May 2019 15:23

To: licensingservice

Subject: OBJECTION to Relicensing of Spearmint Rhino, Sheffield

Dear Sir/Madam

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of Unsuitable Location, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license should not just be refused; it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been, and as the local area changes, this is only becoming worse. It is in the middle of a University, close to a College for CHILDREN aged 14 and upwards, near Freeman College which provides education for young people with Special Needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own Policy.

The law gives absolute power to all Councils NOT to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. Any strip club operators that have tried to challenge a refusal on these grounds has always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm – even though there is now evidence of overwhelming harm, see below – for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always “look with fresh eyes” at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Unfit License Holder

Independent investigators recently provided hard evidence of extreme sexual contact and sex acts at Spearmint Rhino, Sheffield. This included performers masturbating themselves, punters and each other; oral sex between dances; women inserting their fingers into their own vaginas and other women's, women putting their mouths around punters' genitals; women giving out their phone numbers; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable sources of information about this club, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one-offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny EXCEPT from private lap dances, it is also clear that every woman in the club MUST provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to "protect performers" and "prevent rule breaches" – security guards, house mums, dancer codes of conduct, dancer training, etc. – are meaningless.

It means that all testimonies by management and staff, given over years that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

'Improved Regulation' is Meaningless

There is also now hard evidence that whatever 'improved regulation' the council seeks to put in place will also be circumvented. More CCTV, 'panic buttons', 'better training', more 'codes of conduct', 'improved security'? All of this is meaningless.

We know this because similar independent investigation exposed sexual contact as standard in Manchester's strip clubs, despite their being equipped with 'panic buttons': www.notbuyingit.org.uk/ManchesterPIs

We know this because sexual contact was also exposed as standard in Spearmint Rhino's 'flagship' club in Camden. This has to be the world's most regulated strip club, boasting no fewer than 63 CCTV Cameras – whose footage is always fully compliant with club licensing conditions. Likewise, 'secret' spot checks by Camden Council had always suggested the club is fully compliant. Yet, when genuinely secret visits were made by independent investigators, they found lap dancers touching punter's genitals; strippers touching and masturbating themselves; lap dancers straddling and grinding on punters; women putting their breasts in punter's mouths: www.notbuyingit.org.uk/CamdenSRPIs

Camden Spearmint Rhino is the most regulated strip club in the country. If licensing conditions are being broken there as a matter of course, they clearly can be broken – and undoubtedly are being broken – in every strip club in the UK. And there is no way to prevent this.

We know regulation is meaningless, because similar undercover investigations in 2018 exposed sexual contact in the world's most famous strip club, The Windmill Theatre, and in Ealing's longstanding LA Confidential. The breaches here were far less significant than at Spearmint Rhino, Sheffield. Both clubs had their licenses rescinded.

We know all regulation is meaningless because there are now nearly 100 recorded incidences in over 70 strip clubs of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, it is how the strip industry operates: www.notbuyingit.org.uk/Publications#Press

If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly licensing a de facto brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it, (as 'regulation', no matter how 'stringent', is meaningless), outside of it, (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue), or in wider society.

I urge you NOT to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shut down.

Yours faithfully

028 P1

McConaghy Julianne

Subject: FW: Objection

From:
Sent: 17 May 2019 19:41
To: licensingservice
Subject: Objection

Dear Licensing

Objection to the re-licencing of Spearmint Rhino, Sheffield

I object to the relicensing of Spearmint Rhino strip club, Sheffield and call for its license to be refused on the grounds of UnsuitableLocation, Unfit License Holder, the Prevention of Crime and Disorder and Breach of Equality Law. Indeed, the license shouldn't just be refused it should be revoked on many of these grounds, which the Council has an absolute right to do.

I urge you also to offer meaningful exit support to all lap dancers currently working at this club to ensure they can find safe, alternative employment.

I detail my reasons for objecting to the club more fully below:

Unsuitable location

The venue is clearly in a totally inappropriate locality. It always has been and, as the local area changes, this is only becoming worse. It is in the middle of a university; close to a college for children aged 14 and upwards, near Freeman College which provides education for young people with special needs and close to several organisations which support the vulnerable, many with PTSD. It is also in the cultural hub of the city. Many of these are locations already deemed unsuitable according to the Council's own policy.

The law gives absolute power to all Councils *not* to relicense any strip club on the grounds of inappropriate locality alone. This power is irrefutable. There is no ground for legal challenge. And strip club operators that have tried to challenge a refusal on these grounds have always failed.

What is more, there does not even need to have been any change in the area, any material change in circumstances or any evidence of harm (even though there is now evidence of overwhelming harm, see below) for a Council to refuse to relicense a strip club. The very reason Councils have to reconsider strip club licenses annually is to ensure they always 'look with fresh eyes' at every licensing hearing. To not do so and simply rubber stamp a license runs counter to the entire purpose of strip club licensing law.

Find out more about the law and strip club licensing here: www.notbuyingit.org.uk/StripLegal

Unfit License holder

Independent investigators recently provided **hard evidence of extreme sexual contact and sex acts at Spearmint Rhino Sheffield.** This included performers masturbating themselves, punters and each other; oral sex between dancers; women inserting their fingers into their own vaginas and other women's; women putting their mouths around punters' genitals; women giving out their phone number; women having sex with each other (oral and masturbation): www.notbuyingit.org.uk/SheffieldPIs

Since this, the police have also had cause to visit the club.

Women who had previously worked at this club exposed the abuse and intimidation they had experienced at the hands of management at the club's license hearing last year. They were ignored by the Council and painted as liars by club management.

The club has been under the same management for years and has clearly been operating in this manner for a very long time. The license holder is clearly unfit and not a suitable applicant. The license should be refused on these grounds as well as on the grounds of inappropriate locality.

Current Regulation is Meaningless

Extreme levels of rule breaches have now been irrefutably proven.

According to performers who used to work in this club, who seem to present the only reliable source of information in relation to how this club is really run, this has been the situation for many years.

The extreme level of contact again indicates that this couldn't possibly be 'one offs' (on two separate occasions) by half a dozen lap dancers. It paints a clear picture of an entrenched culture. Given the high ratio of strippers to punters and the fact that women have to pay a club to work in it and can't make a penny *except* from private lap dances it is also clear that every woman in the club *must* provide sexual contact. If she doesn't, no man will buy her and she will actually end up out of pocket and in debt to the club by the end of her shift.

Clearly, all attempts to regulate the club are failing and are being actively circumvented. And have been for years.

This means that all Council spot checks and all CCTV supplied to the Council – which always show the club as fully compliant with its licensing conditions – are meaningless. It means that every, and all, other measure to 'protect performers' and 'prevent rule breaches' - security guards, house mums, dancer codes of conduct, dancer training etc - are meaningless.

It means that all testimonies by management and staff, given over years, that there is no sexual contact by anyone in the club, ever, are meaningless. This further means that anything now said by anyone involved in the club, or indeed wider industry, clearly cannot possibly be taken at face value either.

In other words, every single current regulatory measure and all statements from those involved with the club are meaningless.

'Improved Regulation' is Meaningless

There is also now hard evidence that whatever 'improved regulation' the council seeks to put in place will also be circumvented. More CCTV, 'panic buttons', 'better training', more 'codes of conduct', 'improved security'? All of this is meaningless.

We know this because similar independent investigation exposed sexual contact as standard in **Manchester's strip clubs**, despite their being equipped with 'panic buttons': www.notbuyingit.org.uk/ManchesterPIs

We know this because sexual contact was also exposed as standard in **Spearmint Rhino's 'flagship' club in Camden**. This has to be the world's most regulated strip club, boasting no fewer than 63 CCTV Cameras – whose footage is always full compliant with club licensing conditions. Likewise, 'secret' spot checks by Camden Council had always suggested the club is fully compliant. Yet, when genuinely secret visits were made by independent investigators they found lap dancers touching punter's genitals; strippers

touching and masturbating themselves; lap dancers straddling and grinding on punters: women putting their breasts in punter's mouths: www.notbuyingit.org.uk/CamdenSRPIs
Camden Spearmint Rhino is the most regulated strip club in the country. If licensing conditions are being broken there as a matter of course, they clearly can be broken - and undoubtedly *are* being broken - in every strip club in the UK. **And there is no way to prevent this.**

We know regulation is meaningless, because similar undercover investigations in 2018 exposed sexual contact in the world's most famous strip club, **The Windmill Theatre, and in Ealing's long standing LA Confidential**. The breaches here were far less significant than at Spearmint Rhino Sheffield. Both clubs had their licenses rescinded.

We know all regulation is meaningless because there are now nearly **100 recorded incidences in over 70 strip clubs** of sexual contact and more – representing well over 1/3 of the entire UK strip trade. Breaching licensing terms isn't just endemic in the strip industry, *it is how the strip industry operates*: www.notbuyingit.org.uk/Publications#Press

If you license Sheffield Spearmint Rhino, you will be knowingly licensing a venue that will breach its licensing terms and conditions no matter what 'regulation' you put in place. Indeed, you could be seen to be knowingly license a *de facto* brothel.

Breach of Equality Law

Equality law sits above all Council decisions and the Council must abide by it in every decision it makes. Clearly equality law is particularly relevant to Council decisions regarding the strip trade. Yet, the Council has conceded to failing to uphold equality law twice in two separate court cases because of its pro-strip industry, anti-equalities stance. This came at a cost of £130,000 of tax payers' money.

If you license this venue, you will yet again be breaching equality law as you will be licensing a quasi-brothel: a venue where you now know you cannot mitigate its harm for the women in it (as 'regulation', no matter how 'stringent', is meaningless), outside of it (countless women, LGBT groups and even underage girls have already told you of the harassment they have experienced because of this venue) or in wider society.

I urge you *not* to relicense this strip club and, instead of spending money in failed court cases propping up the strip trade, provide exit packages to all performers who might need it once this venue is shutdown.

Sent from my iPhone

McConaghy Julianne

Subject: FW: objection of license for Spearmint Rhino

From:

Sent: 19 May 2019 17:16

To: licensingservice

Subject: objection of license for Spearmint Rhino

I wish to object to the license application of Spearmint Rhino, Brown Street, Sheffield.

My friend, who is a vulnerable adult receive's services in the location of Spearmint Rhino. She any every other person should be able to feel safe and they are regularly heckled by the clientele who use the facility

I know that there is an allegation of sexual activity in Spearmint Rhino way beyond that of stripping. I hear that this is being investigated. Surely no license can be granted until this investigation in concluded. I know that other Spearmint Rhino venues are being investigated in similar ways, which suggests that the company itself is unable to control what happens in its venues

For these reasons given above I expect the Council to refuse this license application.

Regards

McConaghy Julianne

Subject: FW: Objection - License application for Spearmint Rhino, Brown Street, Sheffield

From:

Sent: 19 May 2019 18:05

To: licensingservice

Subject: Objection - License application for Spearmint Rhino, Brown Street, Sheffield

Dear Licensing Service,

I wish to object to the license application of Spearmint Rhino, Brown Street, Sheffield.

The strip club business is based on the sexualisation and objectification of women that sees women as a financial commodity rather than as human beings. It creates a place where men do not have to consider the thoughts, feelings or consent of women, but can simply buy whatever they want from them. Licensing Spearmint Rhino not only encourages these behaviours in men, but legitimises them. This is especially troubling at the Spearmint Rhino location, which is in the heart of Sheffield and on the edge of the Sheffield Hallam University Campus, where young men are forming their patterns of behaviour for their future adulthood.

Licensing Spearmint Rhino is therefore not conducive to the Council's Public Sector Equality Duty in which you have a duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between the sexes. I do not believe that the Council has ever explained how licensing Spearmint Rhino ensures that this is happening and I do not believe that it ever can.

In addition to the reasons above, I understand that there is currently an investigation going on into serious breaches at the club. I trust that if the outcome of this investigation is that breaches did happen, the Council will not grant the license.

The Council has the legal ability and right, to refuse Spearmint Rhino a license, to make a statement that it treats its responsibility for Public Sector Equality seriously. The legislation allows for local people to have more say in whether they want strip clubs in their areas, and yet despite the fact that more and more people object every year, these voices continue to be ignored. The recent loss of Labour seats in the local elections are proof that ignoring constituents cannot go on indefinitely. This is a wake-up call for Sheffield Labour to start listening to the people they represent and this is an opportunity to do so, which a majority of Sheffielders will support.

For all of these reasons given above I urge the Council to refuse this license application.

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