

**Finch Shimla (CEX)**

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

**From:**

**Sent:** 24 May 2019 01:54

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Finch Shimla (CEX)**

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

**From:**

**Sent:** 24 May 2019 06:05

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

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

From:

Sent: 24 May 2019 06:50

To: licensingservice

Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

**From:**

**Sent:** 22 May 2019 17:54

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence on the grounds of:

**UNSUITABLE LOCATION:**

The location has always been unsuitable even according to your own policy. It is also on a University campus. Refusing to relicense a strip club on the grounds of locality CANNOT be legally challenged.

**UNFIT LICENCE HOLDER / PREVENTION OF CRIME and DISORDER / BREACH OF EQUALITY LAW:**

Independent investigation has shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras.

The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or more cameras clearly is not going to make any difference in Sheffield. The licence holder is unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you will be knowingly licensing a venue which will breach its licensing conditions and be putting women at risk.

There is ample research to show that men who consume products and engage in activities that objectify women – like lap/pole dancing, strip clubs, pornography, use of prostitution and trafficking have higher levels of tolerance for rape myths and are more aligned with misogynistic attitudes as well as having a higher than average likelihood of involvement in other crime and deviant behaviour (Farley, Malarek).

There is some evidence to suggest that levels of sexual harassment and sexual assault of women increases in and around sex entertainment venues increasing the lack of safety and right to public space for women.

Measures, policies and decisions which challenge objectification, challenge men's demand and provide interventions that can prevent women and girls entering the sex industry and can support them to exit and build viable alternatives will have a long term positive effects of increasing equality and respect between men and women and bringing cost savings through reducing violence and associated health care needs, reducing harm, reducing mental health issues, reducing problematic coping strategies, reducing children being taken into care

For all these reasons – we would argue in line with the Convention on the Elimination of Discrimination Against Women and the Istanbul Convention that sex entertainment venues of this nature are discriminatory against women and girls and prejudicial to women's equality and to good relations between men and women.

Thank you

**Finch Shimla (CEX)**

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

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

From:

Sent: 24 May 2019 17:39

To: licensingservice

Cc:

Subject: Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
22/05/19

24 MAY 2019

Dear Sir/Madam

Objection to re - licensing of Spearmint Rhino, Brown Street, Sheffield -2019

I am writing to object to the relicensing of Spearmint Rhino. The arguments against such an establishment being located in Sheffield City Centre have been set out cogently and, in my view, persuasively, elsewhere.

I would simply like to add my voice as a man who finds the presence of such an establishment in central Sheffield objectionable. Although I do not live in Sheffield I worked there for over 35 years and very much view it as my home city and I visit regularly. I have daughters and granddaughters.

Establishments like Spearmint Rhino objectify women, using their bodies as commodities to be sold, and as such they contribute to some of the attitudes and beliefs which underpin sexual and physical violence towards women and girls. Ideally, places like Spearmint Rhino, which sell sex and sexual titillation would not exist in at all. But at very least they should not be legitimised by being granted licence to operate in the heart of a modern city. I don't want my granddaughters to grow up in a world where a public body in the shape of the local authority seemingly sees no serious problem with the attitudes represented by this type of business.

Please make the right decision and refuse to renew Spearmint Rhino's licence.

Yours faithfully

  
[REDACTED]

**Finch Shimla (CEX)**

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**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

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**From:****Sent:** 24 May 2019 18:01**To:** licensingservice**Subject:** Objection to the re-licensing of Spearmint Rhino

Dear Sir or Madam

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Yours faithfully

**Finch Shimla (CEX)**

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

**From:****Sent:** 24 May 2019 19:29**To:** licensingservice**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Kind Regards



**Finch Shimla (CEX)**

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

**From:**

**Sent:** 24 May 2019 21:28

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

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## Finch Shimla (CEX)

---

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O210

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**From:**

**Sent:** 24 May 2019 21:19

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicence on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20-year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Yours sincerely,

**Subject:**

FW: Objection to the re-licensing of Spearmint Rhino

O211

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**From:**

**Sent:** 24 May 2019 19:57

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

I am emailing to vehemently object to the licensing of Spearmint Rhino, Sheffield. It is unconscionable that you are considering re-licensing the Spearmint Rhino strip club ON A UNIVERSITY CAMPUS, when it would be perfectly lawful to refuse on the grounds of unsuitable locality. Female students deserve to feel safe at the places they live and study. Strip club punters do NOT leave their attitudes of entitlement towards the female body and objectification and dehumanisation of women at the strip club exit door. Licensing sex encounter venues sends the message that all women are objects and instruments for the sexual use of men, with myriad negative repercussions for women's fight towards equality and safety on the streets. As sexual assault and rape rates continue to remain at unacceptably high rates across the UK, it is time to put women and girls ahead of men's 'right' to perv at exploited women, often half their age.

Yours Faithfully

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

0212

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**From:**  
**Sent:** 24 May 2019 21:19  
**To:** licensingservice  
**Subject:** Objection to the re-licensing of Spearmint Rhino

To whom it may concern:

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

**Subject:**

FW: Objection to the re-licensing of Spearmint Rhino

O213

**From:**

**Sent:** 25 May 2019 12:22

**To:** licensingservice

**Subject:** Objection to the re-licensing of Spearmint Rhino

Hello

I wish to register my objection to this licence as its location is entirely unsuitable according to the Council's own policy - it is even on a University campus. As you should know, a strip club cannot legally challenge a decision not to relicense on the grounds of unsuitable locality.

Recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk. I urge you to ensure Spearmint Rhino's licence is revoked.

Regards

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

By email to: [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

25/5/19

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.**

I am aware that after seeing a number of these template letters, you may no longer read the entirety of them and so I will be placing my own personal tangent on this matter at the start specifically for your attention.

Through my own history of sexual exploitation and the awareness I have of the roles establishments such as these played in not only my own sexual exploitation but in that others, I really must insist that the Council seriously considers the impact of such an establishment in the heart of our city (or in our city at all, frankly). Not far from Spearmint Rhino, a rape crisis centre works with survivors of the kinds of sexual exploitation rampant at Spearmint alongside those that have experienced similar exploitation. Does it really seem sensible to have such vulnerable women in such proximity to an establishment that encourages the same kind of sexual objectification and entitlement?

I am aware that you will be hearing many appeals in support of Spearmint Rhino, specifically stating that the women there are working under their own volition and that it would be oppressive to take away their right to such work. I would like to draw your attention to research provided by Farley et al (1998) which found that around 92% of women wanted to immediately exit sex related industries. While I am not doubting the veracity of the women working at Spearmint Rhino, I do urge you to consider whether the voices of 8% can really

override the majority that recognise the pain and exploitation in such industries and as such want exit immediately. Please do listen to the voices of Sheffield women; this is not something that we want. It is not a case of prudishness, it is a case of exploitation, objectification and entitlement to women's bodies and you have a duty to protect the women of this city.

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 look forward to hearing from you.

### **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 18<sup>th</sup> 2015 <https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>



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

By email to: [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

23<sup>rd</sup> May 2019

Dear Sheffield Licencing

**Objection to Spearmint Rhino licence renewal application**

My name is [REDACTED] and I am a sex trade survivor: I was trafficked into prostitution at the age of 15. I spent 11 years entrenched in the violent world of prostitution and have since worked to raise awareness of the harm it causes to young people and their families.

I was a close friend and fellow campaigner of [REDACTED], the founder of PACE (formerly known as CROP), and was instrumental in the setting up of CROP in 1996, alongside her own organisation, EXIT, which was formed offer support to women exiting prostitution. I travelled the country with [REDACTED] campaigning, speaking about my own experiences, at conferences and on television, challenging the public and professional perception that young people involved in CSE were 'prostitutes,' who had chosen that 'lifestyle'. [REDACTED] sadly, died in [REDACTED] but I had the strength and commitment to carry on the fight, alone. This was at a time when CSE was not recognised as a child abuse issue, but I did not let this deter me.

I became involved in training professionals and working with young people at risk of, or being, sexually exploited. I can speak directly to young people, using the credibility given to me by my own personal experience.

I continue to campaign on the issue of violence against women and girls. I am a proponent of the Nordic model and is a member of SPACE International (Survivors of Prostitution Abuse Calling for Enlightenment).

I founded the 'Build a Girl Project', whose Board is located in Sheffield and am closely linked with this city, where [REDACTED] lived.

The Build A Girl Project is firmly based on a survivor led perspective and is deeply committed to supporting and empowering victims and survivors of sexual exploitation and abuse and challenging the normalisation of sexism and misogyny that girls and young women are often faced with and constrained by.

The Build A Girl Project provides a safe and therapeutic environment for girls and young women to empower them to build a unique self.



I am writing to object to the relicensing of Spearmint Rhino because strip and lap dancing clubs are outdated and harmful and promote inequality between women and men, which is incompatible with the Council's obligation under the Public Sector Equality Duty. Spearmint Rhino has no place in this city and its current location is particularly problematic being next to Sheffield Hallam University student's union, opposite the Site Gallery and Showroom Cinema-both used by children and families -and near Freeman College, attended by many vulnerable young people. On grounds of location listed in the council's SEV Policy the license can be declined

This council has already been subject to two judicial reviews about its failure to consider the effects on all women of licensing strip clubs. On both occasions it has lost. Strip clubs promote a message that it is acceptable to buy women's bodies for sexual gratification, thus treating women as sex objects. This at a time of greater awareness of the impact of such views on both women's sense of safety and their actual safety and no evidence that violence against women, including street harassment of women, is decreasing. Research shows that men who hold objectifying views of women are more likely to be violent to women. In licensing Spearmint Rhino Sheffield City Council gives a confusing message about its commitment to women's safety and equality.

I also draw your attention to the following from the Women and Equalities Committee Sexual harassment of women and girls in public places inquiry:

Jess Phillips: Has a public authority ever been taken to task for human rights for sexual harassment?

Karon Monaghan: I am aware of one case however long ago, under the gender duty—before the public sector equality duty—certainly well over 10 years, 15 years or thereabouts. I am aware of one and that is in the context of licensing a lap dancing club and the impact on women in the community. We have had lap dancing club cases insofar as employment is concerned—so lap dancers have brought claims—but what has been said in the lap dancing public sector equality duty case is that licensing lap dancing clubs, and sexual entertainment venues more generally, have an impact on the wider community because they promote the idea that sexual objectification of women and sexual harassment commonly in those environments is lawful and acceptable. But that is the only context I can think of. It is rarely used in that context and public authorities, in my experience, are rarely challenged for failing to meet that duty and context of sexual harassment.

(<https://www.parliament.uk/business/committees/committees-a-z/commons-select/women-and-equalities-committee/inquiries/parliament-2017/sexual-harassment-public-places-17-19/>)



Women have a right to employment which is safe and not exploitative nor psychologically harmful. There is information about the impact of working in such establishments, including from women who have worked in them, about sexual harassment and assault of the women performers by users and even staff and evidence suggests that this is rife.

I am also aware of information from local publicity which alleges that in a number of such establishments, including Spearmint Rhino Sheffield and the London branch, there have been significant breaches of the licensing conditions which have not been picked up by the council's own inspections. This attests that regulation of an inherently unsafe and unfair working environment is impossible. In Spearmint Rhino Sheffield evidence of unlawful sexual activity is also under investigation.

Given this I can see no reason for Spearmint Rhino to retain its license. As the law permits a local authority to decide not to allow any strip and lap dancing clubs within its area, I would like the licensing hearing to refuse this license, provide support services for women who may be affected and to address this aspect of inequality between the sexes by undertaking a comprehensive overview of the links between the sex trade, female poverty and violence against women to inform future policy making.

Yours sincerely

[Redacted signature]

[Redacted signature]

0216  
P3144

## Finch Shimla (CEX)

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**Subject:** FW: Objection to Sexual Entertainment Venue (SEV) licence application by Spearmint Rhino

0216

**From:**  
**Sent:** 25 May 2019 21:45  
**To:** licensingservice  
**Subject:** Objection to Sexual Entertainment Venue (SEV) licence application by Spearmint Rhino

May 24<sup>th</sup> 2019

Licensing Service  
Block C, Staniforth Road Depot  
Staniforth Road  
Surrey Street  
S9 3HD  
By email to: [licensing@sheffield.gov.uk](mailto: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.**

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 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 look forward to hearing from you.

**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 18 th 2015  
<https://www.cheshire-live.co.uk/news/chester-cheshire-news/chester-platinum-lounge-lap-dancing-9610810>



# WOMEN OF STEEL RESISTERS

24<sup>th</sup> May 2019

Sent by email to: [licensing@sheffield.gov.uk](mailto:licensing@sheffield.gov.uk)

Dear Sheffield Licensing

## Objection to Spearmint Rhino's licence renewal application

We wish to object to object to Spearmint Rhino's licence renewal application on several grounds.

### **1 (a) the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reason;**

1.1 Under "any other reason" we assert that given the alleged (at the time of writing) breaches witnessed by undercover officers in this club and the Camden branch render the applicant and management unsuitable. The applicant seems unable to monitor or enforce conditions of the licence in not one, not two, but three clubs in this chain, as it is also reported that breaches occurred at the Bournemouth club a few years ago (see 1.4 overleaf).

1.2 Some of our members were present at the April's Council meeting and whilst we are all too aware of the nature of the industry we oppose, we were not only shocked by the graphic nature of alleged breaches but shocked to see councillors walk out when it is they who have granted licence renewals year after year, despite hearing harrowing testimonies from ex-dancers of this club.

1.3 Details of alleged Spearmint Rhino Camden breaches are here: <https://www.msn.com/en-gb/news/newslondon/spearmint-rhino-strip-club-probe-after-%E2%80%98lap-dancers-breach-no->

[touch-rule%E2%80%99/ar-AABuGZg](https://www.eveningstandard.com/news/11471476/lap-dancing-club-investigated-after-dancers-allegedly-breach-no-touch-rules/)

EveningStandard.

## Spearmint Rhino strip club probe after 'lap dancers breach no-touch rule'

Anthony France 17/05/2019



1.4 Details of breaches in Spearmint Rhino Bournemouth are here:

<https://www.bournemouthecho.co.uk/news/11471476.lap-dancing-club-investigated-after-dancers-allegedly-breach-no-touch-rules/>

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News

10th September 2014

## Lap-dancing club investigated after dancers allegedly breach 'no touch' rules

By Melanie Voss



**Most read** **Commented**  
1 "To have something like this"

1.5 This is compelling evidence that the applicant is unsuitable, even if the applicant argues that the Bournemouth breaches were several years ago, it attests to a pattern and not learning from previous mistakes.

1.6 Speaking of management, this from a current dancer on a review site:

Overview **Reviews** 28 Jobs 108 Salaries 13 Interview 8



### "Good money if you work for it"



Current Employee - Stripper in Sheffield, England

- Recommends
- Positive Outlook

I have been working at Spearmint Rhino full-time for more than 2 years

#### Pros

Money, flexible hours and you can meet some amazing girls there.

#### Cons

managers are very seedy and sexual assault is prevalent from this line of work; from both the customers and managers. There is a hierarchy of girls and they will pick on the new girls if you don't bow down



## 2 Grounds with respect to location

2.1 (d) the grant or renewal of the licence would be inappropriate, having regard—

- (i) to the character of the relevant locality; or
- (ii) to the use to which any premises in the vicinity are put;

2.2 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:-*

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

2.3.1 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.

2.3.2 The Club is also in the centre of our developing and much vaunted Knowledge Gateway.

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

2.4.1 The recreational space Festival Square is adjacent to the club. This space is identified as a future events space in the Council's own City Centre Plan.

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

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

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

2.6.1 It is directly opposite the Showroom cinema which describes itself as an "independent cinema, café bar and creative workspace. Housed in a former 1930s' car showroom, we are a unique cultural hub situated in the heart of Sheffield's Cultural Industries Quarter."

2.6.2 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.

2.6.3 There are young students not only studying in the surrounding 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 alleged breaches within the club also make its location within the student community highly inappropriate.

**3 The Public Sector Equality Duty and Gender Equality**

3.1 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. We 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.

3.2 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.

**3.3 Extraction of money under false pretext from drunk customers is unethical and antithetical to fostering good relations between men and women**

0217  
PS 5/14

5

← Spearmint Rhino ...


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Rhino - Sheffield, UK.  
18 Sep 2016

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1 star

Avoid the  girl. Complete scammer exploiting drunk men. If you pay by card she adds an extra £10 onto the bill calling it a "service charge". She also says you can touch her just to fool you into a dance. Does she heck. She doesn't even dance. She stands about 5 meters away and when you complain stating this isn't even a lap dance, she starts demanding more money and then "she will dance and let you touch her" if you pay her the same amount again. please sort her out management. Giving your club a bad name.



**Chief**  
Local Guide · 21 reviews · 1 photo

★★★★★ a week ago

Got dragged in by a mate when I was drunk and a girl took advantage of me by getting me to pay for more expensive dances and for longer times every dance and that's all she's telling you throughout each dance and then telling me that we can do more (touch) in private which costs even more but you can't and they try to stop you from leaving by going in hand with you when you go to pay everytime and obviously trying to get you to get more dances as that's their job. 20% more on card also.

3.4 This reinforces extremely damaging and negative stereotypes about women being "manipulative", "money grabbing", "teases", and everything that is problematic with transactional sex.

3.5 Again, we refer to the Bournemouth Spearmint Rhino where this happened and it resulted in a legal challenge: <https://www.telegraph.co.uk/news/11220689/Strip-club-Spearmint-Rhino-accused-of-grossly-exploiting-drunk-stag-party-reveller.html>

# The Telegraph

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## Spearmint Rhino strip club accused of 'grossly exploiting' drunk stag party reveller

Paid content

The man claims he spent a third of his salary in one night at Spearmint Rhino in Bournemouth because staff took advantage of his drunken state





3.6 There were also issues around taking payment from a vulnerable adult, detailed here: <https://www.bournemouth.gov.uk/councildemocratic/CouncilMeetings/CommitteeMeetings/LicensingBoard/2014/12/02/Reports/Report-6---Spearmint-Rhino.pdf>

Re: The renewal of a license to the Spearmint Rhino Club Bournemouth

Owing to Press releases this week, I have become aware that the Spearmint Rhino Club in Bournemouth is due for renewal of their license. On behalf of my brother, I

would like to object to the renewal of their license unless they agree to change their practices with regard to explaining their charging and pricing. There is a lack of transparency in their charging and in addition to this there appears to be a common practice of taking advantage of vulnerable customers who are unable to understand what these charges entail. This is particularly offensive when it involves someone with a disability being targeted in this way, as happened with my brother.

My brother who is registered as mentally disabled, chose to take his annual holiday in Bournemouth, his nearest large town. He has a learning disability and he has a very low level of literacy, is partially deaf and wears two hearing aids and has limited understanding of **money/finance/number** value.

Whilst on holiday in Bournemouth, he was enticed, with the hope of adult entertainment into the Spearmint Rhino Gentleman's Club where he was given personal attention and was pestered into buying drinks for

#### **4 Past failures to pay due regard to the PSED**

4.1 This council has already been subject to two judicial reviews (to the cost of £130k) about its failure to consider the impacts on all women of licensing strip clubs. On both occasions it has conceded its failure. Strip clubs promote a message that it is acceptable to buy women's bodies for sexual gratification, thus treating women as sex objects. This at a time of greater awareness of the impact of such views on both women's sense of safety and their actual safety and no evidence that violence against women, including street harassment of women, is decreasing. Research shows that men who hold objectifying views of women are more likely to be violent to women. In licensing Spearmint Rhino Sheffield City Council gives a confusing message about its commitment to women's safety and equality.

#### **5 Going underground?**

5.1 The "going underground argument" is one frequently used for retaining the current licencing regime. We have yet to hear of this happening, however, we make the following points:

- Last year, the club's QC stated that the club has taken a hit since the removal of the signage during operating hours
- So, how will people find them therefore if they are underground?
- There are reports that fewer and fewer stag parties are going to strip clubs
- If underground clubs are found, then the police can arrest the operators and managers and possibly customers. We support the Nordic model which is similar to what we are proposing. The women, however, should NOT be criminalised as under the Nordic model.

- This list here of widespread breaches throughout the industry is a clear indication that it cannot be regulated, no matter how many conditions are imposed:  
<https://www.notbuyingit.org.uk/sites/default/files/Strip%20Sleaze%20Recent.pdf> (attached as an appendix)

5.2 We assert that the removal of a sign during hours when not open does not mitigate against any of the above.

## **6 Empowered to refuse**

6.1 The Sub-committee is reminded that 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'.”*

6.2 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)*

6.3 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 alleged breaches to conditions, which we urge you to do.

Yours

**Women of Steel ReSisters**



**Appendix 1**

In 2010, new laws meant local councils could license strip clubs/lap dancing clubs as sexual entertainment venues (SEVs) rather than leisure venue (like a café or bar).

This is a compilation of illegal activities associated with strip clubs since the new licensing came into place (from 2011).

This is based simply on Google searches of press reports. As such, it is far from an exhaustive list.

This is a dynamic document that will be regularly updated.

If you have relevant information, we'd love to hear from you!

Please contact us at [no@notbuyingit.org.uk](mailto:no@notbuyingit.org.uk)

And, of course, please feel free to use the contents of this document and share widely.

First Created: Sep 2017

Last Updated: July 2018

Strip Sleaze New Rules. Same Old Rule Breaking

Not Buying It [www.notbuyingit.o](http://www.notbuyingit.o)

This summarises press reports of serious illegal activity in strip clubs since new licensing came into effect in 2011. Some of these clubs were forced to close as a result. Shockingly, despite serious (and sometimes repeated) incidents, Councils also allowed many to remain open. Why?

Club Location Date of Incident

Various London 2018

The Windmill Westminster 2018

LA Confidential Ealing 2018

Eroticats Cheltenham 2018

Fantasy Nightclub Cheltenham 2018

Bing Bromwich 2017

Hanley's Staffordshire 2017

Jack of Diamonds

[formally Temptations]

Bristol 2017

Temptations Bristol 2013

Legs 11 Birmingham 2017

Bentley's Doncaster 2017

Diamond Dolls Glasgow 2017

Flirtz Skegness 2017

Angels Leicester 2016

Platinum's Stoke 2017

Silks Manchester 2017

Cleopatra's Lounge Huddersfield 2016

Villa Mercedes Harrogate 2015

X in the City Liverpool 2015

Charlie Brown's The City of London 2012

Red Velvet Durham 2013

Spearmint Rhino Bournemouth 2014

Spearmint Rhino

[All Chains]

Bournemouth 2003

Wiggle Bournemouth 2013

Halos Newquay 2011

Divas Newquay n/a

Summary - Illegal Activities since 2011

Notes

IN RED: These are Clubs in councils given a 'Gold Standard' award for the high standards of their strip club policies by a leading researcher and advocate for the industry:

<http://www.notbuyingit.org.uk/sites/default/files/Teela%20Sanders%20Gold%20Standards.pdf>

It is noteworthy that an argument frequently used by advocates of the industry is "these are not 'cowboy' clubs, if anything untoward was going on surely we would have heard of it by now".

In fact, these are the very words of Philip Kolvin, QC, legal representative for Spearmint Rhino Sheffield at its licensing renewal in 2018. However, the number of serious incidents puts paid to that assumption, not least at the club chain he was representing.

These are just press reports we have retrieved. There is no doubt this is just the tip of the iceberg as we have not located all reports and the press will only report on a small fraction of incidences, most of which club management will ensure are never exposed. This blog gives some insight into this: <https://sevlicensing.wordpress.com/2013/11/>

Just a quick Google search of press reports exposes the sheer scale of sexual harassment (including possible prostitution and trafficking) alongside other criminal activities (including organised crime) that is synonymous with strip clubs. This is despite tighter regulation introduced when lap

dancing became licensed as part of the sex industry rather than as leisure venues like a bar or cafe (around 2011). This report represents just the tip of the iceberg, merely representing easily accessible press reports.

Touching, Sexual Harassment, Prostitution, Trafficking:

London, Widespread 2018

Undercover journalist reveals widespread alcohol and drug abuse, sex acts, harassment and assaults (groping, biting) and intimidation of lap dancers in numerous London clubs all with management complicit:

<https://londonist.com/london/features/this-is-what-it-s-like-being-a-lap-dancer-in-london>

Westminster, The Windmill 2018

A Private Investigator found widespread rule breaching including touching and offers of sex which was confirmed by CCTV footage. The club still appears to be in operation. Westminster has a staggering 12 strip clubs and 25 sex venues in total:

<https://www.standard.co.uk/news/london/historic-soho-lapdancing-club-the-windmill-theatre-faces-closure-after-sting-finds-performers-flout-a3736546.html>

Ealing, LA Confidential 2018

Shut after undercover trading standards reveal performers touching punters and offering sex, in CCTV 'blind spots', with bribed security 'turning a blind eye'. Investigated after tip off from former dancer of poor conditions in clubs, including performers receiving fines of up to £300:

<https://www.ftbchambers.co.uk/news/ealing's-la-confidential-loses-its-sev-licence>

<https://metro.co.uk/2018/06/23/strip-club-shut-dancers-caught-offering-spend-night-clients-extracash-7653652/>

Eroticats, Cheltenham 2018

This is a totally unregulated yet legal 'pop up' strip club. This takes advantage of a loophole written into legislation which allows 'occasional' stripping without the need for a license. This has turned quiet towns like Cheltenham into 'walk through brothels' during race week.

<https://www.thetimes.co.uk/article/cheltenham-festival-hosts-royalty-by-day-galloping-sexism-by-night-v7lsmhl3h>

<http://www.dailymail.co.uk/news/article-5507183/Church-leads-protests-pop-strip-clubs-Cheltenham.html>

Fantasy Nightclub, Cheltenham 2018

License revoked amidst fears of 'aroused men being let loose in the streets' and the potential for dancers being 'touched, manhandled and abused' during Cheltenham race week.

<http://www.dailymail.co.uk/news/article-5507183/Church-leads-protests-pop-strip-clubs-Cheltenham.html>

Detailed – Illegal Activities since 2011

Bing, West Bromwich 2017

Shut down after a brawl led to GBH. Police also expressed grave concerns about prostitution, the use of possibly under age Romanian girls and the possibility that they may have been trafficked:

<https://www.expressandstar.com/news/crime/2017/06/21/strip-club-has-sexual-entertainmentlicence-revoked/>

Hanley, Stoke-on-Trent 2017

Shut down after years of concerns over inappropriate touching, offers of prostitution, drugs and drink spiking <http://www.signal1.co.uk/news/local/hanley-lap-dancing-club-closed-down/>

Jack of Diamonds [formerly Temptations], Bristol 2017

Closed for inappropriate touching: <http://www.bristolpost.co.uk/news/bristol-news/bristol-strip-clubclosed-down-34716>

Temptations, Bristol 2013

Extensive and repeated Sexual Contact in private booths. Club fined and allowed to continue

operating: <http://www.southwestbusiness.co.uk/news/22082013102851-bristol-club-t3-temptationsis-fined-after-its-lap-dancers-go-too-far/>

Legs 11, Birmingham 2017

License suspended for trafficking: <http://www.birminghammail.co.uk/news/city-lap-dance-clublicence-13282405>

Sexual contact observed and under cover trading officers offered 'sexual services' in VIP

rooms: <http://www.telegraph.co.uk/news/2017/07/27/lap-dancing-club-spiked-customers-drinksovercharged-dances/>

Both Legs 11 venues closed after slavery raid & Councillors viewing of CCTV footage:

<https://www.birminghammail.co.uk/news/midlands-news/two-birmingham-legs-11-venues-13343302A>

Spearmint Rhino, Bournemouth 2014

Performers routinely straddling and touching customers and other dancers and simulating sex acts.

Club remains open to this day with 'additional licensing conditions' in place.

[http://www.suttonguardian.co.uk/news/11471476.Lap\\_dancing\\_club\\_investigated\\_after\\_dancers\\_allegedly\\_breach\\_\\_\\_no\\_touch\\_\\_\\_rules/](http://www.suttonguardian.co.uk/news/11471476.Lap_dancing_club_investigated_after_dancers_allegedly_breach___no_touch___rules/)

Wiggle, Bournemouth 2013

Sexual contact including dancers straddling punters, touching of customers and 'sexual stimulation'.

Despite objections from local residents, the police and the Council's own licensing department the club remained open after representation by Philip Kolvin, QC

[http://www.bournemouthcho.co.uk/news/10786993.Lap\\_dancing\\_club\\_could\\_lose\\_licence\\_after\\_\\_\\_staff\\_get\\_too\\_close\\_to\\_customers\\_\\_\\_/](http://www.bournemouthcho.co.uk/news/10786993.Lap_dancing_club_could_lose_licence_after___staff_get_too_close_to_customers___/)

<https://sevlicensing.wordpress.com/2013/11/06/bournemouth-wiggle-club-faces-opposition-at-sevrenewal/>

Licensing Board Agenda at which Licensing Committee are asked to consider whether license

holder is 'fit': <https://sevlicensing.files.wordpress.com/2013/11/agendaandreportspackage7november2013.pdf>

Halos, Newquay 2011

Closed after 3-foot rule consistently breached as witnessed on CCTV:

<http://www.bbc.co.uk/news/uk-england-cornwall-15378800>

Divas, Newquay

Similarly closed: <https://www.bbc.co.uk/news/uk-england-cornwall-15378800>

Cornwall, Police Chief 2012

Police Inspector stresses link with strip clubs and local sex assaults and rape because of the

attitudes promoted by the industry: <https://www.telegraph.co.uk/news/uknews/law-andorder/9284609/Lapdancing-clubs-encourage-rape-and-sexual-assaults-claims-police-chief.html>

A view shared by the general public:

○ The City of London, Charlie Brown's 2012

Closed for offering 'intimate and illegal sexual activity' and breaching the 'frequency exemption rule'

(this bizarrely allows for limited number of lap dancing events without any license whatsoever:

<https://www.standard.co.uk/news/london/intimate-and-illegal-sexual-activity-sees-charlies-bar-thecitys-only-lap-dancing-club-shut-8009400.html>

Attacks on or Related to Performers:

Bentley's, Doncaster 2017

Performer assaulted outside after refusing sex with punter:

<http://www.thestar.co.uk/news/punter-attacks-stripper-outside-south-yorkshire-strip-club-after-sherefused-to-sleep-with-him-1-8508457/amp>

Diamonds Dolls, Glasgow 2017

○ License suspended immediately when a half dressed, drunk and unconscious dancer was dragged out of the club by management and dumped onto the street (performer in question refused to speak to police, presumably out of fear of retaliation by management):

[http://www.ardrossanherald.com/news/15023857.Glasgow\\_kingpin\\_s\\_lap\\_dancing\\_club\\_shut\\_after\\_girl\\_dumped\\_on\\_street/](http://www.ardrossanherald.com/news/15023857.Glasgow_kingpin_s_lap_dancing_club_shut_after_girl_dumped_on_street/)

Cleopatra's Lounge, Huddersfield 2016

Man smashes club window when dancer refuses to 'meet up' with him outside of the club:

<http://www.examiner.co.uk/news/west-yorkshire-news/man-smashed-lap-dance-club-11379793>

X in The City, Liverpool 2015

Punter attacks lap dancer and steals her purse after she refused to give oral sex in a private booth.

Punter: "I said 'are you going to suck my \*\*\*\* upstairs?' and she said 'yes'. Obviously, that was the whole purpose":

<http://www.liverpoolecho.co.uk/news/liverpool-news/thug-attacked-liverpool-stripper-stole-9259574>

Other Criminal Activities:

Legs 11, Birmingham 2018

In addition to prostitution and trafficking, punters claim to have been served while intoxicated (a breach of the club's alcohol license) and having their drinks spiked:

[https://www.vice.com/en\\_uk/article/bj5m8a/the-strip-club-accused-of-drugging-and-robbing-itscustomers](https://www.vice.com/en_uk/article/bj5m8a/the-strip-club-accused-of-drugging-and-robbing-itscustomers)

Flirtz, Skegness 2017

Drugs: <http://www.lincolnshirelive.co.uk/news/local-news/cocaine-regularly-being-taken-lap-351921>

Platinum's, Stoke 2017

Loses its license: 'Exploitation' of punters, including violence and drink spiking:

<https://www.ftbchambers.co.uk/news/stoke's-last-lap-dancing-club-loses-its-licences>

<http://www.signal1.co.uk/news/local/hanley-lap-dancing-club-closed-down/>

Silks, Manchester 2017

Several incidences of brawls and violent behaviour:

<http://www.manchestereveningnews.co.uk/news/greater-manchester-news/silks-lap-dance-clubmanchester-12877276>

Spearmint Rhino, Bournemouth 2014

Drunken customers exploited. It is illegal to sell alcohol to anyone inebriated. But the business model of strip clubs is to ensure customers are so drunk they will spend large sums of money:

<https://www.unlockthelaw.co.uk/News/man-claims-to-have-been-exploited-by-strip-club.html>

Red Velvet, Durham 2013

Surrenders strip club license after a drugs raid exposes Class A drugs on premises:

[http://www.thenorthernecho.co.uk/news/10175030.Strip\\_club\\_surrenders\\_its\\_sex\\_entertainment\\_licence/](http://www.thenorthernecho.co.uk/news/10175030.Strip_club_surrenders_its_sex_entertainment_licence/)

Earlier Incidences

'Rule breaking', harassment and abuse is hardly a new phenomenon at strip clubs. It was wide spread before new legislation came into effect in and around 2011. Notorious strip chain, Spearmint

Rhino being a prime example of this.

Spearmint Rhino 2003

Undercover officers found touching and offers of sex in private rooms at club throughout the

Spearmint Rhino Chain. All branches continue to operate to this day:

<https://www.thetimes.co.uk/article/lap-dancing-club-offered-sex-to-undercover-police-dthnb5xhm7d>

Technical Notes

Right to CCTV Footage

It is important to note that it has been ruled in court that Local Authorities have rights to immediate access to CCTV footage. From our conversations with licensing officers, however CCTV is frequently 'accidentally wiped' or takes many weeks to be handed over:

<https://cornerstonebarristers.com/news/close-encounters-sexual-kind/>

**Subject:** FW: Objection to the re-licensing of Spearmint Rhino

O218

**From:**  
**Sent:** 25 May 2019 16:43  
**To:** licensingservice  
**Subject:** Objection to the re-licensing of Spearmint Rhino

I object to this licence as its location is entirely unsuitable even according to your own policy - it is even on a University campus. As you should know, a strip club CANNOT legally challenge a decision not to relicense on the grounds of unsuitable locality.

Further, recent independent investigations have shown extreme levels of sexual contact and sex acts at this club, despite numerous regulatory measures. Sexual contact was also shown at the flagship Spearmint Rhino in Camden - despite 63 CCTV cameras. The Rhino chain has a 20 year history of prostitution, drugs, drink spiking and pimps under different managers and CEOs. A new manager or a few more cameras is obviously not going to make any difference whatsoever in Sheffield. The licence holder is clearly unfit. You cannot prevent crime and disorder and you cannot abide by equality law.

If you license this club you are knowingly licensing a venue which will breach its licensing conditions and you are knowingly putting women at risk.

Yours faithfully,



## Rhodes-Evans Emma (CEX)

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**Subject:** FW: Spearmint Rhino Objection

O219

**From:**

**Sent:** 26 May 2019 08:51

**To:** licensingservice

**Subject:** Spearmint Rhino Objection

To whom it may concern,

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

Sheffield City Council has a responsibility to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and to foster good relations between the sexes under the Public Sector Equality Duty (PSED). Licensing Spearmint Rhino does not achieve this. The strip club business is based on the sexualisation and objectification of women. It creates a relationship in which women can be bought for the sexual entertainment of men. This does not in any way promote good or equal relations between the sexes.

Furthermore, I understand that there is currently an investigation 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.

Yours faithfully,

**Subject:** FW: Objection to Spearmint Rhino's licence application

0220

**From:**  
**Sent:** 26 May 2019 08:26  
**To:** licensingservice  
**Subject:** Objection to Spearmint Rhino's licence application

To whom it may concern,

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

Sheffield City Council has a responsibility to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and to foster good relations between the sexes under the Public Sector Equality Duty (PSED). Licensing Spearmint Rhino goes against this duty. This is because the strip club business is based on the sexualisation and objectification of women. Women are treated as a financial commodity. As a result, men who go to strip clubs and pay for this type of 'entertainment' do not have to consider the thoughts, feelings or consent of women, but can simply buy whatever they want from them. This is not equality and in no way advances good relations between the sexes.

Furthermore, I understand that there is currently an investigation 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.

Yours faithfully,