

APPENDIX B

Stage One Comments

(Objectors 100 to 152)

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 07:13:14

Women are not a commodity. Women and girls deserve respect and consideration. Males will not die if they cannot view females in a state of undress.

Bearing in mind women are human I am asking that you introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues) in Sheffield and surrounding areas.

1. There is NO LOCATION that is appropriate for the exploitation of women
2. Breaches of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented if you allow any sexual entertainment venues

As you are well aware undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

[REDACTED]

[Sent from Yahoo Mail for iPad](#)

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Licensing of Sexual Entertainment Venues
Date: 28 October 2019 08:07:05

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 09:26:00

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my iPhone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 09:46:53

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues): 1. There is NO LOCATION that is appropriate 2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels 3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults. 4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information 5. Take STRIDENT ACTION on testimonies of women who speak out against the industry 6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Get [Outlook for Android](#)

From: [REDACTED]
To: licensing@sheffield.gov.uk
Subject: Objection to unlimited Strip club license proposal
Date: 28 October 2019 15:17:46

Dear Licensing

I am emailing to record my support for Not Buying's objections to your unlimited strip club licensing proposal. I would like to see a policy introduced of NO sexual entertainment/encounter venues in Sheffield.

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futile of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Regards



From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 15:38:03

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 15:55:44

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my iPhone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 17:25:41

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates %20 the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

[Sent from Yahoo Mail on Android](#)

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Strip clubs
Date: 28 October 2019 17:43:47

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Sent from my Huawei phone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 28 October 2019 20:07:56

I call for the Introduction of a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

There is NO LOCATION that is appropriate

There are numerous records of breaches of HEALTH and SAFETY, EQUALITY LAW, and LAWS AGAINST PROSTITUTION.

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply with the law -

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

In addition The council must

1. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
2. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
3. Take STRIDENT ACTION on testimonies of women who speak out against the industry
4. Offer Quality EXIT SUPPORT must be offered to all dancers when any SEV is shut

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: RE: Sexual Entertainment Venues in Sheffield
Date: 28 October 2019 23:59:13

Dear Licensing,

My name is [REDACTED], I'm an activist, and journalist, and I'm contacting you today to ask you to consider introduces a policy banning Sexual 'Entertainment' Venues in the Sheffield area.

The reasons you should consider this proposal are listed below, and are widely supported by many Sheffield residents and parents, as well as many concerned women and men, worried about the ongoing sexualisation that is being pushed for by those who seek to make money from the exploitative, yet profit making sex trade.

This is why Sexual Entertainment Venues have NO place in Sheffield:

1. There is NO LOCATION that is appropriate

Many people are highly concerned about the increasing appearance of sexual venues, which endanger women by portraying them as objects to be purchased and consumed, impacting on our society and degrading local culture wherever they are installed.

2. They are a breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – and this was at the supposedly highly reputable, and stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are *still* testifying to this.

The entire strip industry operates by providing the promise of sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

I urge you to consider the reasons why you should introduce a policy outlawing sexual entertainment venues in the Sheffield area. Residents, women, men, and our youth deserve better than a degraded culture where porn is normalised.

Strip clubs and sex venues not only impact on the local community but also the quality of life for everyone, as they poison healthy human interaction and erode respect for women.

Please be a voice that stands against this disturbing and increasing trend and stand against the pornographers and pimps who are attempting to encourage people to view women as commodities, so they can profit.

Thank you in advance for your time in this matter,

██████████

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Strip clubs dehumanise women.
Date: 29 October 2019 00:50:44

Introduce a policy for **ZERO** Sexual 'Entertainment' Venues in Sheffield

1. There is **NO LOCATION** that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerning, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure **TRAINING** and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on **WHISTLE BLOWING**

There must be an easy means for women from sexual 'entertainment' venues to whistle blow

and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Strip clubs make a mockery of what it means to be a Labour council.

For God's sake start acting like decent human beings who respect and love and honour the dignity of your sisters and daughters and lovers.



From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sex establishment policy consultation
Date: 29 October 2019 08:06:42

Dear Sheffield Licensing

We are calling on the Council to adopt a nil cap in its new sex establishment policy.

No location is appropriate for a sex establishment.

We support submissions made by Not Buying It Sheffield and Zero Option. Strip clubs are incompatible with the Public Sector Equality Duty.

Yours

[REDACTED]

Sent from my Samsung Galaxy smartphone.

From: [REDACTED]
To: [licensing@service](#)
Subject: Sex establishment Policy Consultation
Date: 29 October 2019 11:34:38
Attachments: [Sex Establishment Policy Consultation.pdf](#)

I attach my submission to your review of current Sex Establishment Policy .
I would be grateful for a written acknowledgement of receipt.

Can I point out that your notice in citizen space is contradictory and confusing re
dates of consultation (8th July and 31st October end dates). This needs to be
corrected.

[REDACTED]

M: 07711313210

Sex Establishment Policy Consultation

Submission by [REDACTED] a personal capacity

In support of the refresh of the current Sex Entertainment Venue policy for Sheffield City Council I wish to offer my submission to the redrafting of the 2011 policy on Sexual Entertainment Venues (SEVs) as a one of the Sheffield Fairness Commissioners, who reported in 2013, and as one of the principal lobbyists for a WHO supported Ageing Friendly Sheffield, currently now fully supported by Sheffield City Council (SCC) Cabinet. Additionally, I write as one of the small team of individual citizens working with Cllr. Iqbal in establishing the Equality Hub Network in 2013, a body who are meant to be the guardians of implementation of the Equality Act 2010 into SCC policy. Thus I offer this submission as someone who has spent his lifetime supporting and actively promoting equal treatment.

My emphasis is upon the adverse effect that the current policy framework and guidance has upon Sheffield citizens and has led to division and rancour between these individuals. Additionally I write as someone who has consistently objected to licensing of SEVs in the city and am appalled by the manner in which the current guidance has been circumvented by Councillors on the Licencing committees. **Thus my first point is to argue** that the guidance on location of licensed premises is too loose and subject to wide interpretation. Any new guidance (or policy) needs to be equivocal and perhaps state that no SEV must be licenced (if at all) within the area bounded by the Sheffield inner ring road. My preference would be for no licenced SEVs in Sheffield at all! Other submissions may be written from a legal lens citing various statutes. As I am not a lawyer I defer to their expertise but do submit that this issue is not only about legal considerations and obligations of the Council. Finally, I would urge any new policy to take full notice of the impact of the local policy developments in Sheffield since 2011 some of which are mentioned here. Sheffield is very much a different cultural and social place than it was in 2011. Indeed, and for example, the submission of Sheffield Hallam University on their plans for city centre campus and other similar Council led developments in the city centre should be recognised.

I would suggest that on this basis and if SCC is serious about equality, Sheffield should not have any SEV's since they run counter to the policy established through the actions, policy developments and the Commission mentioned above. Additionally, and in the light of very different interpersonal sexual relationships in the current epoch and the rise of the #MeToo and White Ribbon campaigns, licensing such establishments only continues to maintain the public patriarchy (Walby 1990) based sexual oppression and sexual objectification of women. Further, by a process of normalisation of such objectification, and female roles within such exchanges, it fundamentally serves to perpetuate the sexual harassment of women. The research evidence has been consistently unequivocal on this point, as I am sure many other submissions have made clear. As a democratic socialist led administration,

SCC could (should?) build a city which counters that prevailing culture. Indeed, its socialist credentials are suffering because they turn a blind eye to the continuing pustule that is Spearhead within our body politic. Then there is the additional consideration that the cost of yearly licensing hearings and the subsequent appeals and judicial reviews in light of severe financial pressures facing Council.

In terms of the first area mentioned above, that of the recommendations of the Sheffield Fairness Commission, and its response to these by SCC Cabinet (on 17th July 2013), cabinet set out how the Council

- wants to do all it can to help achieve the ambitious vision
- will be developing a new Corporate Plan and will incorporate the 10 principles within this new Plan.
- has a potential role to play in a large number of the Commission's recommendations and what the Council will be doing on the recommendations relevant to its work.

The fundamental aim was '.... ultimately about making the city a better place to live and work *for everyone* in the city'. By continuing to license the SEV in the city it has failed to live to that hyperbole. The drafting of the 2011 guidance was only bounded and dominated by an appreciation or interpretation of statute and not, as it should, by the wider social and cultural impact of giving sanction to the licensing of such venues, and more especially sex equality based issues. In short, it has perpetuated and condoned the objectification of women. Hence it has acted to counter the promotion of fairness and equality between the sexes, and against the meaning and value of the 10 principles of the Commissioners report. The SCC Cabinet response (By Cllr. Julie Dore, Leader of Council) was also too focussed upon amelioration of poverty in all its forms, and in my view misinterpreted the philosophical basis of the Sheffield Fairness Commissions report. This was based upon a Rawlsian conceptualisation of Fairness as Social Justice, and is set out in the early part of their report.

As to my second point, as recently as this year, Sheffield has been successful in applying to the World Health Organisation to become part of the global network of Age Friendly Cities. This significant act cannot be ignored. SCC cabinet has agreed to support such a plan to make Sheffield an Ageing Friendly City across all areas of policy implementation. The first iteration of this policy development is set out in the 2012 Paper 'A city for all ages' and contained within the Cabinet papers submitted for the 26th September 2012. These papers align with the WHO's view of what constitutes an Age Friendly City or Community – that is building a community where the physical and social environment for all ages are designed to support and enable people to age within an active ageing paradigm - that is, to live in security, to enjoy good physical and mental health and to continue to participate fully in society, socially, economically, culturally and politically. These are being implemented through 8 domains described by WHO as follows, grouped into three strategic areas:

A)Municipal Services

Communication and Information
Community Support and Health Services

B) Social Environment

Civic Engagement
Social Participation
Social Inclusion and Discrimination

C) Physical Environment

Transport
Outdoor spaces and buildings
Housing

Each of these domains clearly impacts upon each other. Yet for me and in relation to the development of an SEV policy that supports the Sheffield Ageing Friendly policy development must have regard to the Social Inclusion and Discrimination domain as its starting point. The WHO indicates that interventions in this domain aims,

... to create environments that are socially inclusive places, where all people – regardless of age, gender, social position, health or disability – are respected and have opportunities to participate and contribute. To enhance equity, it is crucial to complement population-based interventions with targeted efforts, reaching out to people most at risk of poor health and exclusion, understanding their specific needs and promoting their health and quality of life. (pg. 69 AFEE 2017)

This includes mental health. As has often been stated both orally and in writing at successive Spearmint Rhino (SR) licensing hearings, simply having the (SR) building affects women's health. Having any SEV acts in my view to hinder the development of an Ageing Friendly Sheffield that is free of social isolation and loneliness, that acts to be positively fully inclusive of all ages, genders, and every protect characteristic.

References

- AFEE (2017) *Age-friendly environments in Europe A handbook of domains for policy action*
WHO, Geneva
Walby S (1990) *Public and Private Patriarchy*, Sage London.

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 13:48:33

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

[REDACTED]

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 14:07:52

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my iPad

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 14:29:21

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my Samsung Galaxy smartphone.

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sexual 'Entertainment' Venues in Sheffield
Date: 29 October 2019 15:59:45

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futile of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Yours sincerely,



From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 16:20:13

Dear Sir/Madam,

You must :

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate.
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented.

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply.

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other.

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels.

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information.
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry.
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut.

Kind Regards,

[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 16:30:41

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield
Date: 29 October 2019 16:52:03

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.



From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sexual Violence Venues
Date: 29 October 2019 17:39:26

Dear Licensing

Introduce a policy for ZERO Sexual ‘Entertainment’ Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed ‘Swingers’ Club, complete with a ‘viewing gallery’.

Strip Clubs: The Council’s own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, ‘house mums’, a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet ‘dancing’ there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs’ employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when ‘independent’ inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates

of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Thank you



From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 21:28:21

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my iPhone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 21:34:13

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues): 1. There is NO LOCATION that is appropriate 2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels 3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults. 4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information 5. Take STRIDENT ACTION on testimonies of women who speak out against the industry 6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Please recognise that it is your duty to rid society if these outdated establishments.

Do not use my name, contact details or address.

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Response to SEV Licensing Consultation
Date: 29 October 2019 21:34:57

Dear Sheffield Council Licensing Committee

I believe the Council has a duty to pursue policy which will reduce sex inequality and foster a culture which respects women as full human beings rather than as sex objects who exist for the titillation and sexual gratification of men. The global sexual objectification of women culminates too often in sexual assault and rape. There are very real cultural changes needed in society's attitude towards women and preventing the opening of more sexual exploitation venues will be a good start.

I am calling on you to introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues).

For the following reasons:

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Best wishes

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Consultation
Date: 29 October 2019 22:08:20

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.



From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 30 October 2019 00:28:05

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO location that is appropriate.
2. Breaches of HEALTH and SAFETY, EQUALITY LAW, and LAWS AGAINST PROSTITUTION cannot be prevented.

UK wide undercover investigations show it is impossible to regulate strip clubs to ensure they comply.

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other.

Strip clubs are also inextricably linked to wider criminality: drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels.

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information.
5. Take AFFIRMATIVE ACTION on testimonies of women who speak out against the industry.
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut.

[REDACTED]

Get [BlueMail for Android](#)

Dear Licensing

LICENS
29 OCT
S

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate.

2. BREACH of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clu the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intima contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearm Sheffield. The head of the strip chain even knows when these 'independent' inspections take p

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as fe local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on th the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed* by the industry/their advocates. They are the onl source of information and training from advocates of the strip trade has done nothing to alleviate

4. WHISTLE BLOWING. Facilitate whistle blowing from women who expose wrong doing venues and take strident action.

5. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

6. BROTHELS. Close down Sheffield's brothels. These are illegal and highly abusive. Shut th prosecute those running them, ensure assets are seized and support every single woman

Yours

Signature:



Print Name:

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

Rec'd 29/11

1. There is **NO LOCATION** that is appropriate.

2. **BREACH of Safeguarding & Licensing, Equality and Criminal Law**

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clu the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intima contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearm Sheffield. The head of the strip chain even knows when these 'independent' inspections take p

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as fe local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. **TRAINING for Councillors and Council Staff**

Training and regular refreshers are needed for all councillors and staff on safeguarding, on th the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed* by the industry/their advocates. They are the onl source of information and training from advocates of the strip trade has done nothing to alleviate

4. **WHISTLE BLOWING.** Facilitate whistle blowing from women who expose wrong doing venues and take strident action.

5. **Provide Quality EXIT SUPPORT** for all lap dancers for any strip club that is shut.

6. **BROTHELS.** Close down Sheffield's brothels. These are illegal and highly abusive. Shut th prosecute those running them, ensure assets are seized and support every single woman

Yours

Signature:



Print Name

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

Redd

1. There is NO LOCATION that is appropriate.

2. BREACH of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clul the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intima contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearm Sheffield. The head of the strip chain even knows when these 'independent' inspections take p

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as fe local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on th the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed* by the industry/their advocates. They are the onl source of information and training from advocates of the strip trade has done nothing to alleviate

4. WHISTLE BLOWING. Facilitate whistle blowing from women who expose wrong doing venues and take strident action.

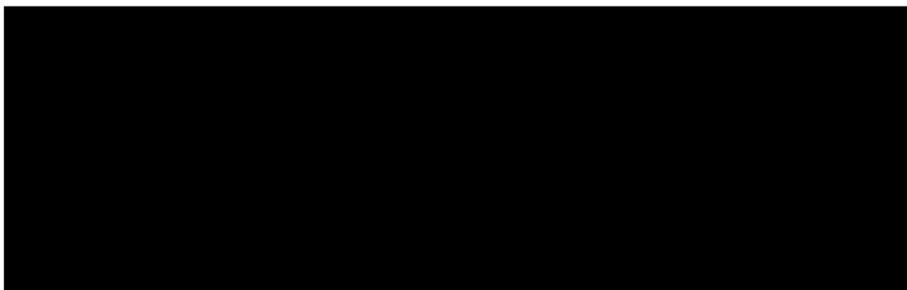
5. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

6. BROTHELS. Close down Sheffield's brothels. These are illegal and highly abusive. Shut th prosecute those running them, ensure assets are seized and support every single woman

Yours

Signature:

Print Name:



Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

Rec'd

1. There is NO LOCATION that is appropriate.

2. BREACH of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clul the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intima contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearm Sheffield. The head of the strip chain even knows when these 'independent' inspections take p

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as fe local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on th the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed* by the industry/their advocates. They are the onl source of information and training from advocates of the strip trade has done nothing to alleviate

4. **WHISTLE BLOWING.** Facilitate whistle blowing from women who expose wrong doing venues and take strident action.

5. **Provide Quality EXIT SUPPORT** for all lap dancers for any strip club that is shut.

6. **BROTHELS.** Close down Sheffield's brothels. These are illegal and highly abusive. Shut the prosecute those running them, ensure assets are seized and support every single woman

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

lecl'd

1. There is NO LOCATION that is appropriate.

2. BREACH of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in club the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intimate contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearmint Sheffield. The head of the strip chain even knows when these 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as for local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed* by the industry/their advocates. They are the only source of information and training from advocates of the strip trade has done nothing to alleviate

4. **WHISTLE BLOWING.** Facilitate whistle blowing from women who expose wrong doing venues and take strident action.
5. **Provide Quality EXIT SUPPORT** for all lap dancers for any strip club that is shut.
6. **BROTHELS.** Close down Sheffield's brothels. These are illegal and highly abusive. Shut them, prosecute those running them, ensure assets are seized and support every single woman

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

Rec'd

1. There is NO LOCATION that is appropriate.

2. BREACH of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one licensed 'Swingers' Club, with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and s unfit management at your one strip club, of the highly reputable Spearmint Rhino chain.

There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clut the UK. And there is *nothing* Councils can do to prevent this.

Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intima contact alongside women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearm Sheffield. The head of the strip chain even knows wher these 'independent' inspections take p

Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as fe local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

3. TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on the the strip trade and how it evades regulation and on SEV and Equality law.

This *must be carried out by those harmed by the industry/their advocates*. They are the only source of information and training from advocates of the strip trade has done nothing to alleviate

4. **WHISTLE BLOWING.** Facilitate whistle blowing from women who expose wrong doing venues and take strident action.

5. **Provide Quality EXIT SUPPORT** for all lap dancers for any strip club that is shut.

6. **BROTHELS.** Close down Sheffield's brothels. These are illegal and highly abusive. Shut the prosecute those running them, ensure assets are seized and support every single woman

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 30 October 2019 07:09:42

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

Sent from my iPhone

From: [REDACTED]
To: [licensing@service](#)
Subject: Response to SEV Licensing Consultation
Date: 30 October 2019 11:13:49

As a member of a licensing authority elsewhere I urge you to consider the damaging effect of sexual entertainment venues on women.

This has been recognised by the Institute of Planning in addition to a number of organisations concerned about the safeguarding of women and girls. The gendered nature of SEV's is proven to cause harm women within the clubs and on the public realm.

Highly sexed males leave these venues and are a threat to other women in the public realm.

What sort of message does it send to young people? That it is perfectly fine for men to pay women for sexual services.

Authorities up and down the country are recognising the damage and reducing the numbers where practically possible. The law is on your side to reduce it to zero.

If you feel unable to do that then remove the private booths in order to safeguard women.

Please apply the Equality Act and safeguard women.

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sexual Entertainment Venue Policy consultation
Date: 30 October 2019 14:58:37

Dear Licensing

We support Not Buying It Sheffield's and Zero Option Sheffield's responses to the policy consultation in:

The adoption a nil cap as the Council is entitled to do;

and

Suggested changes to the policy as proposed by Not Buying It Sheffield.

We look forward to hearing from you.

Best wishes

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Date: 30 October 2019 16:36:15

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Licensing

Introduce a policy for ZERO Sexual ‘Entertainment’ Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed ‘Swingers’ Club, complete with a ‘viewing gallery’.

Strip Clubs: The Council’s own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, ‘house mums’, a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet ‘dancing’ there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs’ employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when ‘independent’ inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those *harmed* by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Yours sincerely

██████████

From: [REDACTED]
To: licensing@sheffield.gov.uk
Subject: response to the sex establishment policy consultation
Date: 30 October 2019 19:34:35

Dear Licensing Officers

Here is my response to the response to the sex establishment policy consultation:

Introduce a policy for ZERO Sexual ‘Entertainment’ Venues in Sheffield

1. There is NO LOCATION that is appropriate for such venues.
2. BREACH of Safeguarding & Licensing, Equality and Criminal Law are frequent – e.g.,
 - Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed ‘Swingers’ club, with a ‘viewing gallery’.
 - Strip Clubs: The Council’s own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club, of the Spearmint Rhino chain.

Breaches of Safeguarding & Licensing, Equality and Criminal Law are not prevented by Council, eg, there is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clubs across the UK. And there is nothing Councils can do to prevent this. Spearmint Rhino Camden has 63 CCTV cameras and yet ‘dancing’ there also involves intimate sexual contact alongside women trying to prostitute themselves. Clubs’ employing in-house inspectors - as is now being practised at Spearmint Rhino Sheffield - is meaningless as a safeguarding strategy for preventing breaches of law because the head of the strip chain knows when these ‘independent’ inspections take place. It is well established that Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as feeders for local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.

http://3.TRAINING for Councillors and Council Staff

Training and regular refreshers are needed for all councillors and staff on safeguarding, on the harm of the strip trade and how it evades regulation and on SEV and Equality law.

This must be carried out by those with first hand experience of having been harmed by the industry/their advocates. They are the only reliable source of information; training from advocates of the strip trade is partisan and has done nothing to alleviate its harm.

4. WHISTLE BLOWING. Facilitate whistle blowing from women who expose wrong doing in these venues and take strident action.
5. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.
6. BROTHELS. Close down Sheffield’s brothels. These are illegal and highly abusive. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Yours sincerely,

Signature: [REDACTED]

From: [REDACTED]
To: [licensing@service](#)
Subject: Sex establishment policy consultation
Date: 31 October 2019 07:05:01

Dear Licensing

Following last year's judicial review when the 2017 Sex Establishment Policy was quashed, I support Not Buying It Sheffield's paper and call for Sheffield to adopt a nil cap of SEVs.

Yours

[REDACTED]

From: [REDACTED]
To: [licensing@service](#)
Subject: Response - SEV Licensing Consultation
Date: 31 October 2019 07:48:56

Dear Licensing Team

My response is as follows:

Please introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breaches of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stopping licensing SWINGERS CLUBS like La Chambre needs to happen urgently where there have already been TWO RAPES, including 1 conviction, and many unreported assaults.
4. Please ensure there are TRAINING and regular refresher courses for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information.
5. Please take action on testimonies of women who speak out against the industry.
6. Please commit to providing quality EXIT SUPPORT to all lap dancers when any SEV is shut.

Thank you

[REDACTED]

From: [REDACTED]
To: [licensing@service](#)
Subject: Not Buying It
Date: 31 October 2019 08:05:22

Dear Licensing

I support Not Buying It Sheffield's paper and call for Sheffield to adopt a nil cap of SEVs.

Regards

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sheffield Council - SEV policy
Date: 31 October 2019 09:15:20

Dear Licensing

I support Not Buying It Sheffield's paper and call on the council to adopt a nil cap of SEV's

Regards

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sheffield SEV licensing consultation
Date: 31 October 2019 10:12:00

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate.
2. BREACH of Safeguarding & Licensing, Equality and Criminal Law
Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, with a 'viewing gallery'.
Strip Clubs:- The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club, of the supposedly highly reputable Spearmint Rhino chain.
There is supposed to be no sexual contact in strip clubs and yet this is what is on offer in clubs across the UK. And there is nothing Councils can do to prevent this.
Spearmint Rhino Camden has 63 CCTV cameras and yet 'dancing' there also involves intimate sexual contact alongside women trying to prostitute themselves.
Clubs' employing in-house inspectors is meaningless, as is now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when these 'independent' inspections take place.
Strip clubs are also inherently linked to wider crime - drugs, dealers, fraud and, of course, as feeders for local brothels. It has been reported that pimps operate outside Spearmint Rhino Sheffield.
3. TRAINING for Councillors and Council Staff
Training and regular refreshers are needed for all councillors and staff on safeguarding, on the harm of the strip trade and how it evades regulation and on SEV and Equality law. This must be carried out by those harmed by the industry/their advocates. They are the only reliable source of information and training from advocates of the strip trade has done nothing to alleviate its harm.
4. WHISTLE BLOWING. Facilitate whistle blowing from women who expose wrong doing in these venues and take strident action.
5. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.
6. BROTHELS. Close down Sheffield's brothels. These are illegal and highly abusive. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.

Yours

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [licensing-service](#)
Subject: Response to SEV Licensing Consultation
Date: 31 October 2019 10:17:59

Introduce a policy for ZERO SEVs (Sexual 'Entertainment' Venues):

1. There is NO LOCATION that is appropriate
2. Breach of HEALTH and SAFETY, EQUALITY LAW, LAWS AGAINST PROSTITUTION cannot be prevented

Undercover investigations UK wide show it is impossible to regulate strip clubs to ensure they comply

Even clubs with extensive CCTV coverage (Spearmint Rhino Camden with 63 cameras), secret Council spot checks, extensive codes of conduct and sworn testimonies of compliance from all staff, operate with sexual contact and sex acts as standard. In Sheffield's club, men buy women to have sex with each other

Strip clubs are also inextricably linked to wider criminality - drugs and dealing, tax and credit card fraud, money laundering and are a feeder and grooming ground for local brothels

3. Stop licensing SWINGERS CLUBS like La Chambre, where there have already been TWO RAPES, including 1 conviction, and God knows how many unreported assaults.
4. Ensure TRAINING and regular refreshers for Councillors and staff on the harm of the strip trade, how it evades regulation and on SEV and Equality law. This must be done by those harmed by the industry or their advocates – the only reliable source of information
5. Take STRIDENT ACTION on testimonies of women who speak out against the industry
6. Quality EXIT SUPPORT must be offered to all lap dancers when any SEV is shut

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Cc: [Bower Claire](#)
Subject: Submission for SEV Policy Consultation
Date: 31 October 2019 11:57:10

Dear Licensing Service,

Please find attached our submission to the SEV Policy Consultation.

We also have a second document showing the results of a consultation we carried out with our members and supporters in Sheffield. Please note however that this was carried out prior to the investigation of Spearmint Rhino. Unfortunately I am currently having problems with putting it into a format which I can share with you. I am currently away from Sheffield and as such do not have access to a printer or scanner, and I think that the best way of sharing it is going to be to print and scan it to you.

I hope therefore that you will accept it next week, I think that it will be very informative for the consultation. You will see that our members and supporters are very eloquent and passionate about this area of our policy.

We trust that this is helpful and look forward to hearing from you regarding the next stage of the consultation process.

Regards,

Charlotte Mead
Branch Leader
Sheffield

 [Final Submission re Sheffield City Council's po...](#)





Submission re Sheffield City Council's policy on SEV licensing

1. WEP oppose Sheffield City Council's proposal to adopt a 'no limit' policy on Sexual Entertainment Venues (SEVs). It amounts to a failure to engage with the reality of lap dancing for the majority of the women working in the industry and its effect on the wider female population.
2. The council has a general duty to consider its responsibilities pursuant to section 149 of the Equality Act 2010 and have due regard to the need to:
 - a. Eliminate discrimination, harassment and victimisation.
 - b. Advance equality of opportunity between the sexes and
 - c. Foster good relations between the sexes.
3. Last year the High Court overturned Sheffield City Council's policy on SEVs. During the proceedings the Court endorsed the principle that the duty to promote or advance equality is a central obligation.
4. It must therefore be treated as a primary consideration when drafting the Council's new policy on SEV licences and reflected in any arguments put forward by the council in formulating its policy. Although the PSED is referred to, stating that the policy "includes a clear and unequivocal commitment to meeting the PSED", that commitment is not included and there is no reference to how the policy adheres to the legal responsibility of that duty.
5. The most likely applicants for SEVs are lap-dancing clubs or so called gentleman's clubs, although Sheffield does facilitate a number of sex shops, but currently no sex cinemas.
6. There is a common misconception that what goes on in lap dancing clubs is harmless fun, the modern incarnation of an old fashioned bawdy 'seaside postcard'. The reality of this industry is however very different and yet there is no commitment in the policy to researching or understanding it. The business model is wholly dependent on extreme sexual objectification.

7. The Council's own investigation into Spearmint Rhino this year found over 200 breaches of their licence. Spearmint Rhino have always presented themselves as the "harmless fun" side of the sex industry, but the Council now know this to be untrue and the investigation has highlighted that it is of paramount importance that the Council seek the opinions, knowledge, research results and evidence from differing sources, not just the industry itself, because they will always present themselves as they want to be seen rather than the reality of the industry.
8. Hyper-sexualisation of women is already extremely prevalent in our society, but is intensified in the culture of lap-dancing clubs. It is the essence of the industry and at the core of glossy promotional publicity, as evidenced by photographs from typical club websites and promotional twitter posts, which promote misogyny and sexism, and celebrate demeaning attitudes to women.
9. The lap-dance itself (normally taking place in a private booth, again as this year's investigation confirmed, although the club itself attempted to present otherwise) replaces consent with commodification by means of the exchange of money, and acts out the fantasy of the idealized subservient female. This is reinforced in the common areas of the venue by ensuring there is over-staffing of self employed dancers vying for attention. This is to give the idea of an abundance of submissive women available to the customers.
10. It is virtually impossible to imagine visitors to these clubs returning to their businesses in this city, without having reinforced ideas of women as submissive sex objects. As a consequence women are more likely to be the victims of sexual harassment on the street and in the work place. Research by Eaves Housing into the effects of licensing as updated by the Met Police, found 3 years after 4 SEVs opened in 1 local authority, rape increased by 33% and sexual assault by 55%, plus there were increased levels of harassment in the area.
11. A 'no limit' policy is being proposed at a time when there are clear, measurable inequalities (e.g. the latest round of Gender Pay Gap reporting) experienced by women in the UK, and in Sheffield. The national and local pay gaps are both close to 20%. There is an urgent need to address the inequalities that underlie these pay gaps. The Council should be reviewing the way that it can close the pay gap, not promoting unsafe and precarious jobs for women as a way of tackling women's poverty.
12. Studies have shown that objectification of women and sexual harassment are contributors to the gender pay gap, and impediments to women competing with men on a level playing field in the work place. See inter alia submission of 'Close the Gap' to Women and Equalities Commission inquiry into sexual harassment in the work place – March 2018.

13. A study by Plan International last year found that two thirds of young women aged between 14-21 have been sexually harassed in a public place in the UK.
14. There is also a recognized connection between domestic violence and a culture where men are encouraged to see women as sexual, submissive objects. Women's Aid for instance describes domestic violence as "deeply rooted in issues of power, control and inequality."
15. Sheffield City Council cannot ignore its obligations to promote equality nor can it legally avoid its responsibility to address all of these issues. (It is of note that Sheffield City Council HQ has reported a significant gender pay gap of 8.4 % and chosen not to file any report setting out how it intends to address this disparity).
16. The consultation process must engage with the reality of SEVs and a failure to consider the issues around lap-dancing clubs in any depth will be both to the detriment of the general female population and the women who work in these venues.
17. It is a high-risk industry where women are asked to work in degrading and dangerous environments which expose them to prostitution and trafficking. It is the business practice of all lap-dancing clubs to engage the dancers on a self-employed basis rather than as employees. As a result they have no employment protection including statutory sick pay or holiday pay pursuant to the Working Time Directive.
18. It is the very reason, due to the high risk nature of the industry, that the Government decided to allow local authorities more discretion under the regulations as to whether they wanted SEVs in their areas, and yet the Council has chosen their own blindness to those realities.
19. While no touching of the dancers is allowed, as we have seen in this year's country wide investigation, the reality is that touching happens in every club across the UK, because that is the basis of the business model and how the industry works. This had already been made clear by many dancers in the industry who have raised concerns about the pressure to offer more than merely a dance, including intimate sexual contact, in order to attract more business and generate income. Whilst the clubs tend to blame the dancers for breaching their rules, as Spearmint Rhino in Sheffield did this year, the clubs themselves and the Council by means of licensing the club, are responsible for creating a culture and the working environment, where dancers may be either willing, or feel pressurised, into engaging in strictly forbidden sex acts.
20. As we have described above the business model of the clubs requires them to give the impression of plentiful and available women to arouse interest. This fuels alcoholic drink sales from which the clubs make the majority of their revenues. As a result there is considerable competition

between the self employed dancers to out-do one another and this may lead directly to risky and illegal behavior.

21. The thin line between lap-dancing and sex work was highlighted by this year's nationwide investigations carried out by two ex police officers as highlighted by the campaign group 'Not Buying It'. This led to a Council investigation of Spearmint Rhino in Sheffield which exposed over 200 breaches of their license. The details of the enquiry in so far as it relates to Sheffield's only lap dancing club clearly shocked councillors when passages from the investigation were read to the Chamber in April this year and demonstrates in the clearest possible terms that firstly the Councillors had no idea of the realities of the lap dancing industry and secondly that they can no longer ignore the reality of these organisations.

22. Currently the council proposes a no limit policy on SEVs purely on the grounds that it is a necessary ingredient of a night time economy. Indeed the policy begins highlighting the absurdity of the Council's approach with a statement which has no economic basis or research to support it. In fact it should be noted that when another lap dancing club applied to open in the same area that there was huge local opposition from businesses, educational establishments, the creative industries and local residents, to the extent that the applicant withdrew their application at the hearing. No assessment of the possible financial contribution to the economy has been advanced nor how other businesses in Sheffield would benefit.

23. We feel it necessary to highlight, as we have on many previous occasions, that the law allows the Council to make the decision to have no SEVs at all in our city. It is not compulsory for the Council to host an industry which contributes this much harm to the population and it is not a "necessary ingredient of a night time economy."

24. The business model of these clubs tends to suggest that a minimal contribution to the local economy is made.

25. If Sheffield is to facilitate this part of the sex industry we have repeatedly called for the dancers in these venues to be provided with full contracts of employment. This would make their relationship with the club transparent and their tax affairs can be openly regularized with HMRC under the PAYE system. It would also avoid discrimination between the female dancers and those employed by the club such as managers and other staff who are on the pay roll. It would also ensure that lap dancing clubs make a proper contribution not merely to National Insurance but also VAT.

26. A key indicator of the economic health of any region is the contribution made by local businesses to VAT revenue. If dancers were brought onto the payroll, lap dancing venues would be liable for what could be substantial VAT payments chargeable on the 'services' supplied by them to the customers. It would also result in greater tax oversight.

27. Accounts filed with Companies House suggest that Spearmint Rhino, Sheffield's only lap-dancing club, pays minimal taxes compared with its overall turnover. The last accounts filed for Spearmint Rhino Venture (UK) Ltd as of the 31st December 2017 indicate that the company paid £19,781 from a turnover of £5,246,693.

28. Sheffield City Council could have ensured that a proper tax contribution is made by making it a condition of licence that contracts of employment are provided to all employees working in their club. However it failed to engage with any of the issues raised in the previous consultation or individual license hearings. The Council's suggested policy would foster a 'grey' employment market.

29. Research has shown that women in the lap dancing industry are attracted to the business because of the ability to avoid paying income tax. The clubs are not under any obligation to record the fees generated by the dancers and there is no possibility for the tax authorities to investigate whether full tax is being paid on earnings.

30. This year's investigation highlighted that although the club states that dances are paid for with chips bought from the club and that no money is exchanged between dancer and customer, that again the reality is that cash is paid directly to the dancers by customers, it is unclear whether a record of this is taken.

31. The very purpose of the current SEV licensing legislation was to give City Councils greater control and discretion over this problematic industry, with the option of deciding not to host any SEVs. Currently the Council is clearly reluctant to adopt anything more than a light touch approach, even when serious breaches have been found, and this has been manifested in hearings concerning Spearmint Rhino, where there has been a failure to treat complaints seriously. The time for light touch licensing has passed, and the Council must face the reality of the consequences of their decisions to license SEVs, thus facilitating the sex industry in our University campus and city.

32. At last year's SEV application we witnessed Sammy Woodhouse, a victim of the Rotherham child abuse scandal, being treated extremely poorly and disrespectfully when she raised concerns about the industry generally and made specific allegations about the culture of exploitation at Spearmint Rhino Sheffield where she had previously worked. She was given no opportunity to substantiate her claims, despite proffering evidence. Her claims were dismissed as lacking in evidence, whilst the company's flat denials were accepted by the Licensing Committee at face value.

33. There has hitherto been a woeful lack of curiosity or engagement on the part of the licensing committee and this was demonstrated at the meeting held last year when the now quashed policy was passed, where some of the

councillors who attended (6 out of 15) appeared poorly informed about the issues involved. It was impossible to determine whether they had read the original policy document or consultation submissions or had relied on summaries provided by the licensing department. This policy was quashed at Judicial Review.

34. This lack of engagement is also reflected in the failure to consult organisations that would have an interest, such as the PCC or even its own departments, such as Planning. As a result Spearmint Rhino has been allowed to become part of Sheffield Hallam University's campus. There has been no consultation with this University, who are one of the biggest developers in the city.

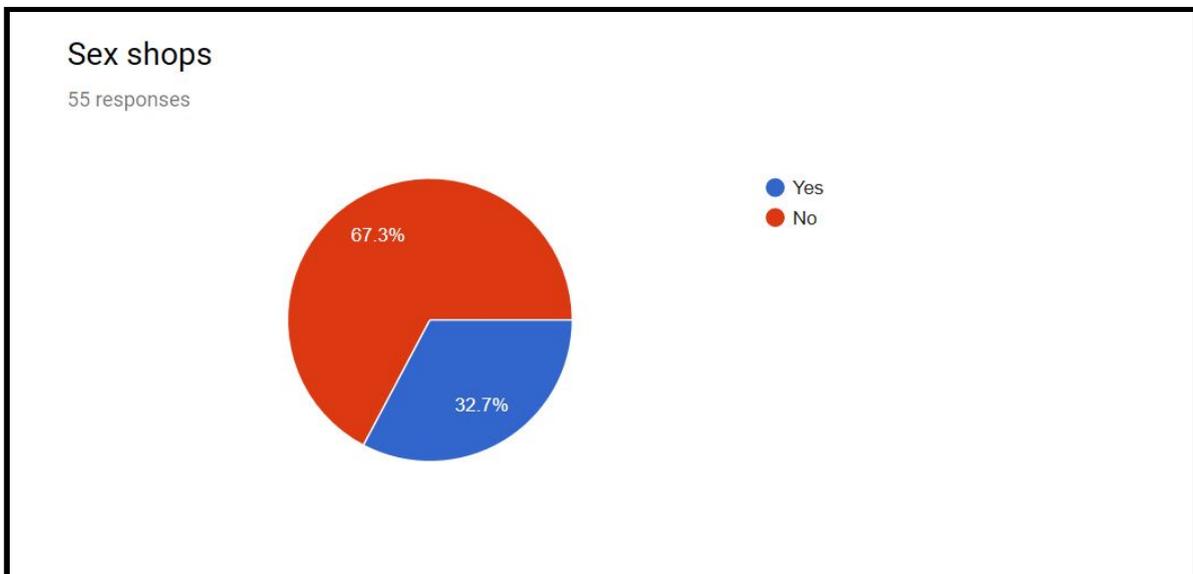
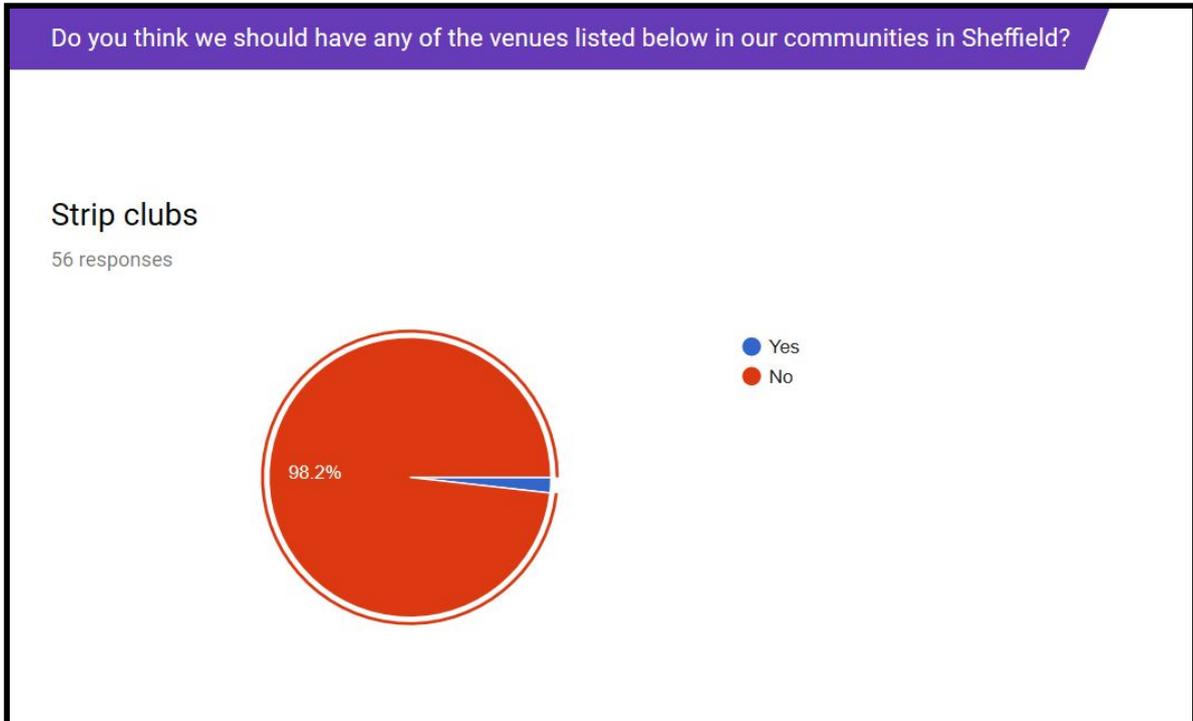
35. The Vice Chancellor and the Estates department have made it clear that they do not want a lap-dancing club near their halls of residence or University buildings. Likewise the museums, galleries and art spaces in the vicinity of the current lap dancing club have objected to the presence of such a club adjacent or close to their own establishment

36. While it is proper for the committee to consider all views, the adoption of a no limit policy would be unconscionable and would amount to a complete derogation of Sheffield City Council's duty to develop a policy with regard to its Public Sector Equality legal duties and would devalue all of the Council's work and policies regarding striving for equality for the city of Sheffield.

Women's Equality Party
Sheffield Branch
October 2019

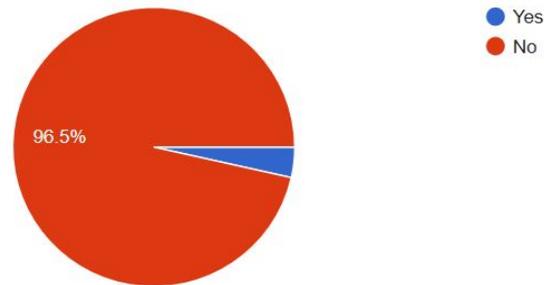
Summary Results from Women's Equality Party Survey about Sex Establishments

Below are the results from a survey we conducted with our members and supporters to gather their views on sex establishments.



Sex cinemas

57 responses



If you have selected any of the venues in the previous question, please state why and what positives, if any, you believe they bring to the community.

21 responses

As far as I am aware Sex shops provide equipment for single people and couples to enhance their sexual experiences. If there are any other services provided then this may be exploitative.

I don't see any reason why people can't buy clothes, equipment and toys for sexual pleasure. These can be for both sexes and are not necessarily objectifying.

Shops that sell articles that can be used in loving relationships are fine so long as they are out of the way. Eg. The Pulse & Cocktails locations off Penistone Rd and the one in the industrial area outside Rotherham are fine. Any on Division St for example not so much.

Sex shops allow people to access toys and materials that can enhance their sex life, particularly people into kink or fetish. Not everyone has access to the internet so sex shops allow this to be available to all, even those with limited internet or credit card access.

Respect for strippers, and sex workers is essential for building a better society, and ending toxic masculinity by (for starters) discussing sex openly with children, and explaining to them that porn and erotic dancing are exaggerated depictions, and that they should respect all women and femmes. Banning or closing down these establishments will only drive the industries underground, where the workers of marginalised genders will have fewer rights and less access to safe working conditions.

I think sex shops provide products that both men and women want to buy.

Sex shops can be run without threat to women and children and promote pleasure in sex for all, not the exploitation and objectification of women

No positives except may be of use to some, but no harm either

Sex shops should be for both sexes and all genders not just there to cater for a certain type of male clientele. As such shops like Shh in London are positive and affirming of consensual sexual enjoyment. In theory I would not be opposed but in practice I would fear the type of sex shop that might apply for licensing: this answer would ideally be a 'maybe.'

I think that properly licensed sex shops and sex clubs can meet a need without reinforcing degrading sexual stereotypes or opening people to abuse. It's a territory that is difficult to define, however, and I'm not an expert in knowing what lines can be effectively drawn.

Sec s

Many items available in sex shops can be bought over the internet but not everyone has access to the internet. Out of the 3 listed activities I think that sex shops are probably the least harmful

I think that sex shops allow access to devices and materials that can enhance sexual pleasure

Sex is for everyone to enjoy and I dont see anything wrong in purchasing items for personal use that enhance peoples sex lives

No positives for women or girls any community

I have no problem with shops selling sexual aids but I think the number should be limited and they should not be in locations near schools or other places predominantly used by children.

I think sex shops can be good because people can buy sex toys and things like that which people like to use and which are not inherently discriminatory.

Sex shops offer a way to buy things such as vibrators for people who are not on the net. For Strip clubs, I don't feel it's up to me to tell what gay men may want. I don't like the exploitation of women in strip joints, obviously, but sexual exploitation of poor women - some of whom are underage is a major issue.

Sex shops and cinemas don't necessarily bring benefits to the community (neither does a newsagent or a regular cinema) but they are pretty neutral for consenting adults

It's 2019 and women are still fighting discrimination equality prejudice and oppression. These places keep women down

Sex shops can promote healthy, fun ways to live an enjoyable sex life. Fun sex is different from pornography were a distorted image of sexual acts can be offered.

If you have not selected any of the above, please state why and what negatives, if any, you believe they bring to the community

46 responses

Likely increase in areas where women are vulnerable and/or subject to abuse

Strip clubs are highly exploitative, encourage misogyny and discrimination against women, I believe they contribute to rape as men are turned on, leave premises at the early hours, and take what they couldn't pay for from vulnerable women alone at night

They teach young men that women are objects for their use not equal human beings

Easy access to women as products is not limited to the venues only. As this spills onto the streets, women feel, I feel, threatened.

I believe such venues reinforce gender inequality and chauvinism; devalue women and girls; and, consequently, harm our society more generally, including male-female relationships. It's important to note that many men oppose the existence of these venues - the opposition isn't solely from women.

Venues that focus on the bodies of women reinforce the notion that women are objects that exist for male pleasure. This is a highly pervasive notion that will take a lot of undoing and this is one way

I'm torn about strip clubs. On one hand, I think they contribute the harmful misogynistic narrative that women are there for men's amusement/gaze/pleasure. I think they contribute to rape culture. On the other hand, there are many stories from women who work in strip clubs and the sex industry who defend their right to do this work and do not see what they do as anything other than empowering. On balance, I disagree with them, particularly on a university campus.

They are not properly regulated or monitored to ensure regulations are being followed. Everyone should have the right to a safe working environment and if the relevant regs are not being followed or implemented effectively these establishments should not operate.

I suffer daily sexual harassment from a man who frequents such places and has therefore come to view women as objects. We need to send out a clear message that this is unacceptable and we are not doing by having such venues. Nor are they a form of empowerment for women who might choose other jobs - if they could rightfully earn the same money and the gender pay gap as closed. It's 2019 not 1919. Time for change. You've destroyed us with these venues - especially in the cultural quarter and this city long enough. We feel and are unsafe.

Strip clubs perpetuate idea of women's naked bodies being a commodity to be sold. Anyone performing, watching or profiting is demeaned. If the council profits from business rates from such premises it too is demeaned. They are party to the 'sex trade'. Are there really 'sex cinemas' in the digital age?? If there are then the issue is about pornography and the rights/wrongs of that. However, the council should not be endorsing or profiting from this either.

All are degrading to women

They encourage and make commonplace the objectification of women; make surrounding areas less safe and accessible for women; encourage discrimination against and harassment and victimisation of women.

I believe that although some of these establishments have existed for decades, that there is enough provision online for these services that would leave the way open for small businesses to exist when retail units become empty, thereby additionally helping to boost the local economy.

My belief is that having a provision for strip clubs, sex shops and sex cinemas within Sheffield a city "where everyone matters" can potentially help to promote an environment where negative stereotypical attitudes towards women and men can flourish, whereas an environment free of these facilities would help to pave the way for the licensing of SME'S in a modern creative environment which would be more beneficial both to the local area, and the wider city economy in the long term; eventually having a broader positive impact on all sectors rather than a niche sector catering for a particular "recreational" demographic.

Until sex work is *properly* legislated so that sex workers have the protection that they need and we can put an end to trafficking and exploitation, there should be absolutely no reason to have any of the more "legitimate" side of sex work in our city.

The presence of the above mentioned establishments in Sheffield, particularly in times of austerity, are a symbol of the sexual inequalities in society. They compromise the safety of women & children in the area. On granting a licence, the council is legitimising the exploitation of sex workers & women in general.

The sex industry is exploitative of women and contributes to the inequality in society between the sexes. Strip clubs operate by celebrating the idea that women's value is in their sexual availability to men. Pornography is selling dangerous ideas about sex which is contributing to the murders of women during sex acts and propping up men's excuses that it was just 'sex gone wrong'

Any venue that places women and women's bodies for objectification as a form of entertainment undermines attempts to achieve equality. This goes against equalities commitments. I have walked past sex clubs and cinemas in other cities and felt real fear about the men standing outside, or exiting. I do not see why, as women, we are being asked to accept or approve premises and businesses that continue to perpetuate our objectification and make us feel unsafe in a city that should support safety of all.

They normalise the objectification of women. How men behave inside of these venues is not bounded and carry forward outside of the venues.

Strip clubs in particular present women as sexual objects for men and I believe are essentially degrading. I'm aware that some women claim that burlesque dancing can be empowering because they experience it as celebrating their sexuality. The core issue is about genuine consent but there are other concerns such as acceptable boundaries re touch, pay, etc.

Sex films can be problematic too, normalising fetishistic and sometimes abusive behaviours, although there is an argument for properly licensed non-abusive pornography being available for those who wish to access it. Sex films can be accessed nowadays without the need for specific cinemas however. (The policing of the Internet is an altogether more challenging question.)

SEVs objectify women and encourage a belief that women's bodies can be bought for sex. This does not lead to positive community cohesion.

They all encourage the objectification and denigration of women

They do not enhance the locality in any way, and always seem to be biased in favour of men. There is no equality in these venues, just stereotyping women as objects, things to be paid for.

Sorry about exploitation

I think they do not bring any positives into the community. They promote businesses that cause trafficking, segregation of women and gender inequalities.

I don't think there is any place for these seedy establishments in the modern world. Pornography can be highly addictive and damaging to people, due to its objectification of (mainly) women and the unrealistic and sometimes violent sex it portrays, which can be taken as normal behaviour. They portray a view that women are always sexually available and willing, which in my view encourages rape and violence against women.

It is very evident to me that the purpose, activities and attitudes fostered by these venues work in direct opposition to the stated need for local authorities to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity and
- foster good relations between different people [i.e. women and men]

Doesn't foster good relations between men and women.

It is very evident to me that the purpose, activities and attitudes fostered by these venues work in direct opposition to the stated need for local authorities to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity and
- foster good relations between different people [in this case between women and men]

The presence of strip clubs in any setting perpetuates the inequalities between men and women. Their very existence sends the signal to our society that women are there for the sexual satisfaction of men, in an imbalance of power.

That attitude will always extend beyond the clubs, onto our streets, into homes workplaces and places of study of the men who would like to enjoy these clubs.

Also, there is exploitation of vulnerable women through these establishments. While I accept that this is not universal, and some women find this work empowering, I feel that the physical, financial and psychological harm done to is too high a price to pay. I accept that these clubs allow some women to make a living, but we would not expect men to sell themselves sexually to make ends meet

Sex is not a commodity to be sold

These types of venues are purely an exploitation of women and encourage behaviour which adds no value to society, they pose a potential risk and abusive nature not healthy for its users or active members providing the service. There is no value for such institutions and offer nothing positive to society.

I don't feel they belong in a respectful and civilised society. When sex is commodified by selling images or 'services' it degrades those who participate. It's degrading to men and women and helps perpetuate sex stereotypes. The way forward is to try to claim back our sexualities from the pornographers and pimps who want to make more and more money from selling unhealthy images and ideas about sex.

These premises encourage the objectification and abuse of women and create a culture where women are viewed as objects for male consumption. It supports industries that make profits from abusing, degrading and humiliating women and girls.

These places normalise pornography and the objectification and commodification of women's bodies. In a world where violence against women and girls is at epidemic levels, we need to be doing more to promote healthy attitudes towards women and not, with council sanction, create places where men think it is normal for women to be available to perform whatever sexual act they wish for money. The attitudes in men this engenders places all girls and women in danger, not only those who may - or may not - choose to work in or for such venues. Licensing them only helps to create a market to the detriment of all females in Sheffield. Let it not be forgotten, too, that many women do not choose to work in this exploitative and dangerous industry. Many do so as a result of poverty, addiction, domestic violence, trafficking and slavery. As a left wing council, Sheffield should be doing more to address these matters, not encouraging and condoning them through its licensing policy.

Such establishments are also in contravention of the council's own policies on equal opportunities. How can Sheffield present a modern, progressive image to the world whilst continuing to licence so-called SEVs?

Strip clubs are inherently exploitative to women and not appropriate, catering largely to men they do not bring anything positive to the community.

Sex cinemas - I don't know much about these, but as a woman I would be frightened to enter such a place. I feel such a place would largely cater to men showing porn which is degrading to women, therefore it is not positive for the community.

The only way any sex industry tool ie clubs, shops, video etc works is because just by the fact it's a business it exploits the pleasurable idea sex brings to humans and commodifies it. And it's plain to see that the images portrayed within this industry is usually the exploitation on women and girls. You only have to view recent high profile news outlets to see such things.

Dangerous and degrading behaviour seen as acceptable no benefits to any community a danger for girls and woman

The use, abuse and exploitation of women in these establishments reflects society's current retroactive attitudes. Eliminating all aspects of the sex 'trade' is a step to teaching everybody that women, women's bodies and minds are their own and not for sale.

I believe these sex establishments have a negative effect on the local community - they are set-ups which degrade and exploit, in particular, women and treat sex as a commodity rather than focussing on its importance in healthy, safe, caring relationships between consenting adults.

Strip clubs are very discriminatory against women as almost 100% of the performers are female and the consumers male. They normalise objectification of women. As for sex cinemas, they are not bad in themselves but most porn is so misogynistic and this is what I believe would usually end up being shown.

Sex cinemas are surely out of date due the proliferation of porn online..

Strip clubs are exploitative and misogynist

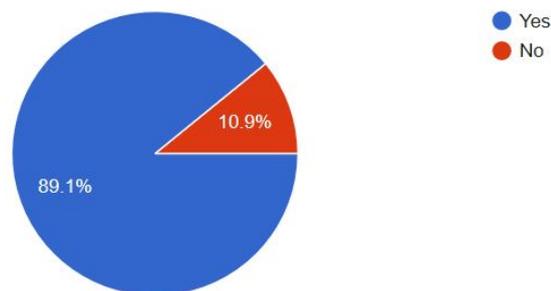
Sex is not a form of entertainment and should not be seen as such.
The negative effects the so called 'sex entertainment' industry has on a society far out ways any monetary positives.
It exploits usually females of all ages.
There are numerous studies showing the catastrophic effects the sex entertainment industry has on a society.

It's 2019 and women are still seen as sex objects. Can we start asking questions about why this outmoded oppressive 'entertainment ' is necessary?

These types of businesses are potentially coercive and encourage misogyny and blurring of lines and risky sexual behaviour, that is a bad example and not the kind of entertainment that people should be drawn into, or make money from due to the exploitation of low waged or unemployed people who may be on the breadline, or in desparate need of money. It encourages an atmosphere of hedonism that can lead to health problems feelings of low self-esteem or that anything goes. Sexual behaviour should normally be in a loving committed relationship, and is very personal and private. In addition the very presence of this type of business makes it more likely that criminal activity based upon exploitation will flourish, due to the influence on the tone of the surrounding areas. And there are problems for women in particular due to potential violence, and disrespectful attitudes that SEVs perpetuate. The way that women are treated like pieces of meat to be bought and sold, or trained to do anything to get a small reward is very demeaning and degrading.

The law also allows the Council to have regard to the locality of a venue when looking at an application. It allows the Council to set in their policy whether certain buildings, businesses or facilities make a particular location unsuitable. For example, if they are near places used by children, young people or families including educational establishments or leisure facilities. If the Council decides that it does want to have these venues within Sheffield, do you think that the location of them should be taken into account when considering the granting of a licence?

55 responses



If yes, do you believe the above to be the right approach or not? Please explain your answer.

Should not be in mainstream shopping areas or near education facilities

Yes but there should be more concrete laws "taken into account" doesn't mean that will actually stop it having a licence. There should be literal laws like distance in feet so there are no grey areas

Again this normalises in the minds of young people this disregard for women's equality

I'd prefer the Council not to have any of these kinds of venues in Sheffield. However, if the Council decides it wishes to have such venues, they should be in locations well away from areas used by the majority of people; and special provision should be made for safe transport for workers at the venues. I don't think any establishment that encourages excessive drinking, large groups of drunk people and often very late (if not all night) opening should be near schools, family and health centres.

It is right that none of these types of establishments should be permitted in the types of locations listed above. No centres.

If the council decides they should exist, the location should be restricted but in a location that is still safe for the female workers to get to and from work.

Yes, the city is for everyone not just a select few groups of people. It's not appropriate to have these kinds of establishments in certain areas, definitely not near establishments that families and young people access or near the universities.

Spearmint Rhino should not be in the cultural quarter near the Showroom, students and all our independent tv companies

Such establishments should be as far away from populated/busy areas as possible. The majority of people are not comfortable walking past strip, lap dancing clubs whether they are male or female. Women on their own feel particularly wary if they encounter 'customers' of such establishments. Children should definitely not have to be near them.

These establishments are wrong in principle. If they exist at all they must be contained.

I don't think such venues should be considered a normal entertainment or leisure activity

Right approach would be to refrain from granting licenses, but if there is no alternative they should be sited in locations well out of the city centre and away from the locations noted. Access to them should also be by means which avoid routes and transport frequently used by such groups.

Yes, I believe that the above is the correct approach to take

The fact that we have a strip club in the prime area of the Cultural Industries Quarter, and right opposite the Site Gallery and Showroom cinema, both hugely popular with families, is a disgrace.

If a licence is to be granted it is better to have the criteria mentioned above in place. Better still - don't grant the licence in the first place.

Mo we shouldn't have any. What are they contributing to society? Nothing but the continuation of misogyny.

Why only young people and families? This is not the definition of 'woman' and we ALL have a right to live our lives free from the blight of such businesses. Also, looking at Leeds and its attempts to regulate the sex industry, any premise you license will include women who are trafficked, have difficult lives, are vulnerable etc. Putting the so-called business 'out of sight' doesn't change that. The council would be saying they care about girls until they are adults and then we couldn't care less. Don't license these businesses, we don't want them and you won't have to ask this question.

The presence of these venues are visible to the public and their very locality has an impact in the normalisation of these businesses

I think any officially licensed sex venues should be in recognised red light districts, away from children etc, as mentioned above.

If the Council decides to license SEV s it should ensure they are in places with minimal impact on children and the general public

If no, please explain your thoughts/beliefs on this

As above

Some children are female, and some family's have females in them. Even if the venues are away from the common areas, the females are still the targets of misogyny. A child of 11 was whistled at earlier this week!

The Spearmint Rhino in Sheffield is placed in a family friendly area, next to the Student Union, Site Gallery, Showroom Cinema, etc. I spend lots of time visiting the gallery and cinema, and barely even notice the strip club. I've walked down there alone late at night (a cisgender woman) and felt no different to walking in any other area (although I might not feel so safe on west Street after dark).

As said. Right approach would be to ban such venues altogether.

I don't think they should be considered so a licence should not be given

I believe that the council should not be considering giving a license for any venue that sells and promotes sexual abuse/degradation/objectification of women and girls. Therefore the question of where is no longer relevant.

It's unacceptable that councils still do not think this does not degrades women

No such establishments anywhere is the best approach.

Misogyny is misogyny wherever it is located. If we take account of location, we risk sending it to the less desirable parts of town, where fewer middle-class activists venture

If the council believes that these establishments are not harmful and that sex should be sold, then they should be allowed to open anywhere.

Any other comments about Council's Sexual Entertainment Venues Policy

I know they're more interested in money than morals, ethics and integrity

I believe the female workers at Spearmint Rhino (and similar venues) should be assisted to find employment which better values their (present and longer-term) capabilities, qualities and aspirations. I support the rights of women and people of marginalised genders to bodily autonomy and safe spaces to work.

Sheffield should be willing to lead by example and stop the exploitation and objectification of women and girls

I don't see how the Council can uphold its Public Sector Equality Duty and continue to license places where men buy women.

How can SEVs be seen to promote equality between men and women

Cannot see how any of these take 'equality' into consideration.

The Council has an opportunity here to fully consider its Equality Duty, and do the right thing in setting a NIL cap on the number of SEV's in the city.

I think the council should exert it's legal right to set the number of SEV's in the city to nil. This sends a message to the people of the city and beyond that Sheffield is a city that cares about equality.

I feel the Council need to take into account it's own equalities policies. How can licensing establishments like Spearmint Rhino not be a contradiction of the councils Equalities policies? The young women working there have no rights, no employment contracts and have to perform sexual act that are demeaning and degrading to earn any money at all.

I am shocked that in 2019 Sheffield council has a policy for "sexual entertainment". This term is sanitizing a brutal and dehumanizing commercial enterprise which makes money from people's vulnerability ability. This "entertainment" contributes to violence against women and needs to be named for it is.

Sheffield City Council has an opportunity to support its female residents population and protect all young minds in Sheffield. These industries are purely about money. And most of the money made is by the owners of these establishments, they will say that it's employees will also benefit from working there but would YOU or your daughter look up to working in places like this or would YOU wish to be part of creating a Sheffield that values its WOMEN and MEN. There is no place in society anymore for these mind numbing forms of entertainment and science states males violence towards women and children is scaled up when unfiltered access to any form of sexual entertainment is allowed. There are many many studies from all around the world that back my opinion. Get in touch if you would like to read them.

Yes you should be more concerned about the way this effects men's behaviour and the safety of woman when granting licences in locations that are not acceptable

Sexual entertainment is there for men's entertainment, to the detriment of all women.

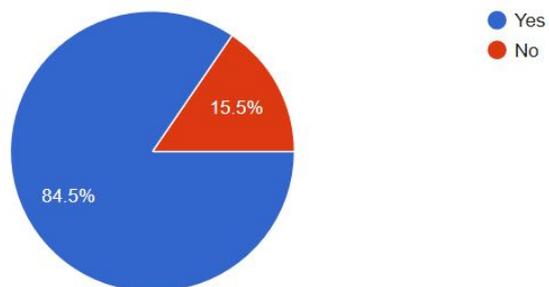
In theory, I have no moral objection to people having sex in whatever configurations, in front of a (consenting) audience, or even being paid for performances. But in practice, the sex entertainment industry exploits women and normalises the idea that women's bodies are consumer goods. The relationship of consumer to performer is unequal and discriminatory. Porn is often horrendously violent and promotes the idea that sex is for men's pleasure only. Given this context, there is no place for this in Sheffield

We don't need SEVs

In my opinion the type of entertainment that people have access to is something that can be regulated at local government level, but sometimes the tone of a neighbourhood is drawn very quickly downhill if one such SEV is allowed, as they could give the tacit implied agreement of the council that that is the type of entertainment that is all that is available, or that is the most desired due to its kudos, that some vulnerable people could think is the most exclusive. The reality is often completely different as these places are based upon an assumption of misogyny and violence towards women, that can give people unrealistic ideas about sex. It is not a good example to set, and with its culture of theatre and pop music, Sheffield has many better opportunities for entertainment.

Do you live in Sheffield

58 responses



If you answered no, where do you live?

8 responses

Buxton

Hope Valley (ex of Sheffield).

Rotherham

Cornwall (visit Sheffield regularly and have family there)

Barnsley

Stowmarket Suffolk

Harthill, Sheffield postcode

Bradford



White Ribbon House, 1 New Road, Mytholmroyd, West Yorkshire HX7 5DZ

31 October 2019

Dear Sir/Madam

RE: Sheffield City Council Sex Establishment Policy Consultation

White Ribbon UK works to end male violence against women with a specific focus on engagement with men and boys. Fifty four local authorities have achieved White Ribbon Accreditation demonstrating that they meet the core criteria of strategic leadership, engaging men and boys, raising awareness and changing culture.

For any local authority to become accredited there must be a declaration that they are working towards a zero tolerance of Sexual Entertainment Venues. This is due to the well-documented direct risks to women that the venues themselves pose. We also want to strongly state that the accessibility of such venues can promote extremely harmful male cultures within communities, in terms of the objectification and sexualisation of women that can lead to gender based harm and violence.

We are therefore making the case that Sheffield City Council should commit to working towards an zero tolerance approach to sexual entertainment venues. It is important to note that failure to take this stance will prevent the council from being able to achieve White Ribbon Accreditation.

Yours faithfully

A handwritten signature in black ink that reads 'Anthea Sully'. The signature is written in a cursive, flowing style.

Anthea Sully

Chief Executive

White Ribbon UK

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sexual "entertainment" venues policy
Date: 31 October 2019 14:11:56

Dear Licensing

Introduce a policy for ZERO Sexual 'Entertainment' Venues in Sheffield

1. There is NO LOCATION that is appropriate

2. Breach of Safeguarding & Licensing, Equality and Criminal Law

Swingers Clubs: There have now been 2 reported rapes, including 1 rape conviction, at your one currently licensed 'Swingers' Club, complete with a 'viewing gallery'.

Strip Clubs: The Council's own report found over 200 breaches of extreme sexual contact and suggested unfit management at your one strip club – of the highly reputable, stringently regulated Spearmint Rhino chain.

These breaches were happening despite CCTV, council checks, security guards, 'house mums', a wealth of codes and policies and years of sworn statements from countless club staff that it was highly regulated and safe. Staff are still testifying to this.

The entire strip industry operates by providing sexual contact and there is nothing any Council can do to mitigate this.

More CCTV is meaningless – Spearmint Rhino Camden has 63 cameras and yet 'dancing' there also involves widespread sexual contact and women trying to prostitute themselves.

Clubs' employing in-house inspectors is meaningless, as now being practised at Spearmint Rhino Sheffield. The head of the strip chain even knows when 'independent' inspections take place.

Strip clubs are also inherently linked to wider crime – drugs & dealing, credit card fraud, tax evasion and, most concerningly, are simply a feeder for local brothels. It has been testified that pimps operate outside Spearmint Rhino Sheffield.

4. Ensure TRAINING and regular refreshers for Councillors and Council staff

This is urgently needed on safeguarding, the harm of the strip industry, the futility of regulatory measures and on SEV and Equality law. This must be carried out by those harmed by the industry or their advocates. Not only do they present the only reliable source of information but training provided to other councils by advocates of the strip industry has done nothing whatsoever to alleviate its harm.

5. Take strident action on WHISTLE BLOWING

There must be an easy means for women from sexual 'entertainment' venues to whistle blow and strident action must be taken when they do.

6. Provide Quality EXIT SUPPORT for all lap dancers for any strip club that is shut.

7. Take strident action against Sheffield's numerous BROTHELS

These are illegal. Shut them down, prosecute those running them, ensure assets are seized and support every single woman out.



Office of the Vice-Chancellor
Sheffield Hallam University
City Campus
Howard Street
Sheffield S1 1WB

Licensing Consultation
Block C
Staniforth Road
Sheffield
S9 3HD

T +44(0)114 225 2050/3492

c.husbands@shu.ac.uk
www.shu.ac.uk

30 October 2019

Vice-Chancellor
Professor Sir Chris Husbands

Dear Sir/Madam

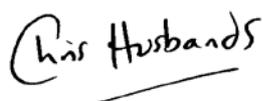
In response to the draft policy for the licencing of sexual entertainment venues, sex shops and sex cinemas across Sheffield, Sheffield Hallam University would like to make the following observations.

1. With respect to location **Discretionary Ground d)** our experience in recent renewal applications is that where the Licensing Authority has not previously fully taken into account the character of the relevant locality it is impossible for objections to renewals to be made. Grounds for objections to renewals therefore need to be clearly spelt out in this policy document which is currently not the case. This should permit previous outcomes to be challenged, particularly where known breaches of a licence have been proven. The fact that a sexual entertainment premises exists in areas that the proposed policy describes as inappropriate to such an activity is at best counter to the Licensing Authority's draft policy and at worst continues to cause serious concern with local businesses, cultural interest and faith premises and educational establishments.
2. The operational hours of sex establishments is listed as a consideration in an application but there is no mechanism for the Licensing Authority to check the operational hours of other businesses, cultural and faith facilities and educational establishments in the vicinity. There should be a requirement that this is clearly established as part of any application and renewal process by the Licencing Officer. This will avoid misinformation being presented to the Licensing Sub-Committee by the applicant which objectors have no way of challenging in a hearing of the Licensing Sub-Committee.
3. There is a disconnect within the proposed objection to applications in that whilst a timescale is established in which objections have to be made there is no timescale in which the applicant for a new or renewal licence has to make their responses to the objections public. The policy makes no provision for this information to be shared with objectors in a timely way prior to the Licencing Sub-Committee hearing and therefore prejudices objector's ability to challenge the applicant's submission without the need for an adjournment. Applicants response to objections should be made available at least 14 working days prior to a hearing.

4. Where renewals applications are being made the policy should indicate how infringements of the licence which have taken place in the previous licencing period are to be considered as part of the assessment by the Licencing Sub-Committee. There should be clearly spelt out criteria for the Licencing Sub-Committee to consider previous infringements in terms of volume and frequency and over what period of time. At best any infringements to a licence should require a higher level of scrutiny by the Licencing Sub-Committee.
5. Known Public Health concerns should carry a greater weighting to the panel's assessment of an application or renewal. In particular as more research becomes available on the impact such establishments have on the treatment of women the panel must demonstrate that they have taken into account the findings of such research as advised by their own Public Health team or that of Government or published academic articles.
6. Where submissions are made for or against a new application or renewal the Licencing Officer should ensure where these are been made on behalf of an organisation or as a representative of a body of interested people that the author has the authority and approval to submit such support or objection to the application. This will avoid incorrect assumptions being made in the future as to the weight given to particular letters of support or objection. For example, where a student union officer has written a letter of support for an application it should not be assumed that this is a view shared by the whole student body. Investigation by the Licencing Officer would have established this not to be the case.

Effective regulation is important. We believe that the measures and improvements set out here will provide the local authority with a much more transparent and robust approach to regulation.

With best wishes,

A handwritten signature in black ink that reads "Chris Husbands". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Professor Sir Chris Husbands
Vice-Chancellor
Sheffield Hallam University

From: [REDACTED]
To: [licensing@service](#)
Subject: Sex Establishment Policy Consultation
Date: 31 October 2019 16:33:49

Dear Licensing

Following last year's judicial review when the 2017 Sex Establishment Policy was quashed, I write in support of Not Buying It Sheffield's paper and suggested changes to the Policy which includes the recommendation that Sheffield adopt a nil cap of SEVs.

I look forward to hearing from you.

Best wishes

From: [REDACTED]
To: [licensing-service](#)
Subject: SEV POLICY
Date: 31 October 2019 19:50:48

I support *Not Buying It Sheffield's* paper and call for a nil cap of SEVs in Sheffield.

[REDACTED]

From: [REDACTED]
Subject: From a Trans Survivor
Date: 01 November 2019 13:20:47

What is going on across councils in the UK? Why are you continuing to support sexual exploitation by granting/renewing licenses to strip clubs etc.? I was in the sex trade for years & it's re-traumatising to see society/the state condone our suffering. Enough. We matter more than money. Please follow the Nordic Model if you want to help the vast majority & most vulnerable of us in the long-term.

From: [REDACTED]
To: [licensing@sheffield.gov.uk](#)
Subject: Sex licensing
Date: 31 October 2019 11:16:33

Hi.

As you are requesting views regarding sex licensing I wish to pass on mine.

Regarding venues like strip clubs I think it is very important we do not allow very many and that they are not together. I believe this could cause a 'sexualised area' (i.e Havelock Square, old Jessops Hospital area) that would attract other elements and I for one do not want Sheffield to be known as a 'sex capital'.

Not being a highly commercial city in the way for example Leeds is, we rely upon universities and the massive students population for our economy. So this is the main age group in our city centres and surrounding area. Because of this we already attract a high drug scene, hence increased criminal activity, and we do not want to add into this with the sex industry.

Also I feel in today's 'me too' era we should not be condoning this. Sheffield Council should not be giving young students and girls at the start of their adult life a 'gateway into the sex industry' by working as strippers, etc. Its unthinkable to consider what path this must put so many girls on to. How must this effect their young minds? Future personal and family morals? Longterm this effects their offspring also, and so it goes on and you have a breakdown of family life. Dramatic?? Just look back for the proof of how changes have eroded family life to date. And for the council to condone this I believe is highly inappropriate. Setting good moral examples. Giving them alternatives. Working with universities would help.

If we 'have' to have sex venues they should not be on every ones doorstep. Outer areas of Sheffield. The safety of the girls should be paramount with clubs paying extra for transport and security as part of their costs. And a code of conduct that if broken results in custodial and not a fines or warnings if possible. And it needs to be strict, perhaps with regular visits by a council worker unannounced. A true picture then would be recorded and checked, and not a front promoted by the club, etc.

As for sex shops their window displays, marketing, p.o.s., and entrance views to the shop should be regulated not showing anything that has an 'over 18 only' market.

I am being devils advocate here. I am not a prude or a Mary Whitehouse. I personally think these venues and shops should be available, but having children I really do not want to push these elements into their young lives daily. If they want it I am sure they will seek it out. I have a son at university in Sheffield. These are very real issues; drugs, sex industry, alcohol, clubs, gambling and are real dangers and the violence and crime that come with them, our young adults face far too regularly. In my opinion they are becoming normalised. Not good for our young generation or the City of Sheffield.

From the city of Sheffield's view point it is often on the council's head what is allowed onto our streets to some extent. And the crime wave that can follow that decision. We are seeing first hand the terrible effects of drugs on our streets, with turf wars and guns now. We certainly need to think long and hard about adding the sex industry into this volatile mix. We do not want trafficking or procuring the girls already in the scene into the sex industry. As we have a massive young, student industry here, it would be very easy

pickings for any would be gangster to start up their industry, if it is allowed to flourish. If we are firm and realistic we make it harder for them. Fast track and less bureaucracy. If in doubt, dont allow it. Sex industry added to the drugs industry here in Sheffield would be catastrophic for the city.

I do not understand what I am sure is the complicated task of Sheffield Council. I love Sheffield. It is a great city of diversity of people, food and culture. I am proud to be a 'Sheffield lass' It looks better and better each year. (Although roads have been made worse... sorry, but it's true) But these issues you have to decide on can often not be reversed. So real care and consideration should be taken and consequences will be apparent in the near future if wrong. Maybe going into universities for views and speaking to young people within the sex industry, a committee of those it effects?

I would love to make a difference and understand this sex industry issue more, but as I do not I/we rely on our council to police these issues for us. And make good, moral, forward thinking decisions. I have faith in you to try to do that. Thank you.



From: [REDACTED]
To: [licensing@service](#)
Subject: FW: Response to the Sex Establishment consultation
Date: 06 November 2019 12:49:28
Attachments: [SCC SE Policy for consultation 2019 NBIS comments.docx](#)
[NBIS Sex Establishment policy consultation response 2019.docx](#)

Dear Licensing

Please find attached:

- 1) A copy of the quashed sex establishment policy with comments made by tracked changes and foot notes with our suggested changes and recommendations;
- 2) A supporting paper outlining all the available research and why we are calling for a nil cap.

You are most likely aware that at last year's judicial review, the court heard:

'A tabulated overview of all consultation responses was also provided to the Committee as part of the Report. It is noted that none of the evidential content of the Zero Option responses (either to the first or second stage of the consultation process) was summarised in the appended table, and therefore none of the contrary academic evidence to that contained in the EIA's "Supporting Information" section was before the Councillors when they took the Decision.'

Could you please therefore ensure that the full committee receives copies of both documents prior to its meeting so that the above situation is avoided this time?

I would be grateful if you could acknowledge receipt of this email.

Draft Sex Establishment Policy

Incorporating Sexual Entertainment Venues, Sex Shops and Sex Cinemas

Licensing Service

	Page No.
Part 1 - Introduction	3
Part 2 - Overview	3
Part 3 - Consultation on this Policy	4
Part 4- Definitions	5 - 6
Part 5- Integration with other Statutes	6
Equality Act 2010	6
Human Rights Act 1998	7
Provision of Services Regulations 2009	7
Crime & Disorder Act 1998	7
Part 6 - The process of applying for a Licence	8
Making an Application	8
Objecting to Applications	8
Determination of Applications	9
Mandatory grounds for refusal	9
Discretionary grounds for refusal	10
Appeals	10
Part 7 - POLICY	11
Discretionary Grounds a & b:	
Suitability of the Applicant, Manager & Beneficiary Policy	11
Discretionary Ground c:	
Number of Sex Establishments	12
Discretionary Ground d:	
Location	12
Conditions	13
Representations	13
Waivers	13 - 14
Part 8 - Safeguarding and Public Health	14
Safeguarding	14
Public Health	14
Part 9 - Enforcement	14
Better Regulation Delivery Office: Regulators' Code 2014	15
Complaints	15
Data Sharing	15
Part 10 - Parallel Consent Schemes	16
The Licensing Act 2003 (the 2003 Act)	16
Planning and Building Regulation Control	16

Part 1 – INTRODUCTION

Licensed sex establishments in Sheffield contribute to the recreation, entertainment and night-time economy and provide an additional appeal to residents, tourists, visitors and the students that attend the two universities.¹

To promote a vibrant city the Licensing Authority regulates the scale, diversity and concentration of all licensed entertainment in an open, fair and legal manner.

This policy provides Sheffield City Council's approach to the regulation and licensing of sex establishments which incorporates sexual entertainment venues, sex shops and sex cinemas, as set out in the Local Government (Miscellaneous Provisions Act) 1982 as amended by the Policing and Crime Act 2009, within the City of Sheffield.

The policy provides a framework to assist applicants and decision makers in making and considering applications and ensuring all relevant factors are given proper attention.

Part 2 – OVERVIEW

The Sheffield City Council Sex Establishment Policy ("the Policy") sets out the City Council's approach to the regulation of all types of sex establishment and the procedure relating to applications for sex establishment licences.

The sex establishments this policy applies to are:

- sexual entertainment venues
- sex cinemas
- sex shops

The aim of this policy is to provide guidance for prospective applicants, existing licence holders, those who may wish to object to an application, South Yorkshire Police and members of the Licensing Committee when determining an application.

This policy will be kept under review and revised where necessary.

Each application will be dealt with on its own merits on a case-by-case basis.

Consideration will be given to the Equality Act 2010, the Human Rights Act 1998, the Provision of Services Regulations 2009 and the Crime and Disorder Act 1998 and the Home Office Guidance for England and Wales on Sexual Entertainment Venues (March 2010).

The City Council does not take a moral stance in adopting this policy. The Council recognises that Parliament has made it lawful to operate sex establishments and that such businesses are a legitimate part of the retail and leisure industries². It is the City Council's role as the Licensing Authority to regulate such premises in accordance with the law. [The Council is also empowered to refuse new licence applications and renewals to existing licences.](#)

The City Council is committed to applying the law and policy to promote:

- High management standards at licensed sex establishments;
- Public Safety of staff, performers and patrons at sex establishments;
- Safeguarding of staff, performers and patrons at sex establishments; and

¹ Please see [Magda Boo's paper on impacts on students and student vulnerability presented to the Spearmint Rhino licensing sub-committee in September 2019](#)

² [This sounds defensive and presumes licences will be granted](#)

- Safeguarding vulnerable persons in the locality of sex establishments.

Part 3 – CONSULTATION ON THIS POLICY

This policy is subject to a 12 week consultation.

Part 4 – DEFINITIONS

“the Act”

refers to the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009.

“the Council”

means Sheffield City Council.

“the Policy”

refers to the Sheffield City Council Sex Establishment Policy.

“sex establishment”

the collective term for sex shops, sex cinemas and sexual entertainment venues.

“relevant locality”

means the locality in which the premises, vehicle, vessel or stall are situated. For the purposes of this policy, each application will be determined on a case-by-case basis. In individual cases, if it is necessary to decide the precise boundaries of the relevant locality, this will be done on the facts of the individual case.

“character of the relevant locality”

means the character or characteristics of the locality in which the premises, vehicle, vessel or stall are situated. In determining the character of the area, the Council will consider what the primary use premises in the locality are put to, any additional uses of premises in that locality, and any purposes that may require persons to use that locality, for example transport hubs, cultural hubs, etc.

“the premises”

means the premises, vehicle, vessel or stall that are the subject of the sex establishment licence or of the application for a sex establishment licence.

“sex cinema”

means any premises, vehicle, vessel or stall used to a significant degree for the exhibition of moving pictures related to, or intended to stimulate or encourage, sexual activity, acts of force or restraint associated with sexual activity, or concerned primarily with the portrayal of or primarily deal with, or relate to, genital organs or excretory or urinary functions, but does not include a dwelling house to which the public is not admitted.

“sex shop”

means any premises, vehicle, vessel or stall used for a business consisting to a significant degree of selling, hiring, exchanging, lending, displaying or demonstrating:

- (a) sex articles; or
- (b) other things intended for use in connection with, or for the purpose of stimulating or encouraging—
 - i. sexual activity; or
 - ii. acts of force or restraint which are associated with sexual activity.

“sex articles”

include written or visual material such as sex magazines or books, or visual or audio recordings concerned with the portrayal of, or primarily deal with or relate to, or are intended to stimulate or encourage, sexual activity or acts of force and restraint associated with sexual activity, or which are concerned primarily with the portrayal of, or primarily deal with or relate to, genital organs or urinary or excretory functions.

“sexual entertainment venue”

means any premises at which relevant entertainment is provided before a live audience for the financial gain of the organiser or the entertainer.

“relevant entertainment”

means any live performance or live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of an audience (whether by verbal or other means). An audience can consist of just one person (e.g. where the entertainment takes place in private booths). This definition would apply to the following forms of entertainment [as they are commonly known]: lap dancing; pole dancing; table dancing; strip shows; peep shows and live sex shows. This list is not exhaustive and should only be treated as indicative. The decision to licence premises as sexual entertainment venues shall depend on the content of the relevant entertainment and not the name given to it. An applicant will be expected to set out the exact nature, extent and scope of the relevant entertainment.

“display of nudity”

means, in the case of a woman, exposure of her nipples, pubic area, genitals or anus; and in the case of a man, exposure of his pubic area, genitals or anus.

“the organiser”

means any person involved in the organisation or management of relevant entertainment.

“significant degree”

in the context of sex shops, shall be considered by the Council on a case-by-case basis. In considering significant degree, the Council will consider, amongst other things:

- the amount of shelf space devoted to relevant articles
- the annual turnover in relation to relevant articles and other things
- the way the business is marketed and advertised and
- the primary intention of the majority of customers in visiting the shop.

“permitted hours”

are the hours of activity and operation that have been authorised by the Council under the sex establishment licence.

Part 5 – INTEGRATION WITH OTHER STATUTES

There are a number of statutory provisions which apply to every action the Council takes as a public authority. These include, but are not limited to:

- the Equality Act 2010;
- the Human Rights Act 1998;
- the Provision of Services Regulations 2009; and
- the Crime & Disorder Act 1998.

Equality Act 2010

This Act legally protects people from discrimination in the workplace and wider society. This includes the Public Sector Equality Duty (PSED), which means that the Council must thoroughly consider, in the discharge of its licensing functions, the need to:

- promote equality of opportunity;
- eliminate unlawful discrimination, harassment and victimisation;
- [foster](#) good relations [\(including tackling prejudice and promote understanding\)](#)³

This applies for this policy and to the consideration and determination of applications for sex establishments.

A detailed Equality Impact Assessment (EIA) has been undertaken and kept under review throughout the drafting of this policy and then finalised on publication of the policy. Further EIA's will be conducted where necessary.

³ [“Foster” replaces “promote” and addition of including etc for the exact wording of the PSED](#)

It is not considered likely that the equalities obligations are at risk as there is no perceivable risk of unequal access to the services between different equality groups, save for those under 18.

Licensing Committee members have undertaken equality and diversity training and will be reviewing their learning on a regular basis to ensure their knowledge and understanding of all matters concerning equality and diversity are at the highest standard to allow them to make decisions.

This policy includes a clear and unequivocal commitment to meeting the PSED in the exercise of all of the functions under the Act. The policy and the documentation flowing from it are intended to be a key means of facilitating compliance with all of the Council's obligations. Great care has been taken in developing a policy that is fit for purpose in this regard but it is only when it is tested in action that it will be possible to evaluate its effectiveness. This assessment will be kept under regular review, particularly in the early period of implementation, so that any shortcomings identified in the document itself and/or the way it has been implemented can be addressed.

Human Rights Act 1998

Incorporates the European Convention on Human Rights and makes it unlawful for a Local Authority to act in a way which is incompatible with a convention right. The Council will have particular regards to the following relevant provisions of the European Convention on Human Rights:-

- Article 1 of the first protocol: Everyone is entitled to the peaceful enjoyment of his or her possessions. It should be noted that the Courts have held that a licence is a person's possession;
- Article 6, in relation to the determination of civil rights and obligations: Everyone is entitled to a fair and public hearing within a reasonable time, by an independent and impartial tribunal established by law;
- Article 8: Everyone has the right to respect for one's home and private life, including, for example, the right to a "good night's sleep".
- Article 10: Freedom of expression.

Provision of Services Regulations 2009

These Regulations require that applications are processed as quickly as possible and, in any event, within a reasonable period. The Regulations also specify that in the event of failure to process the application within the period or as extended in accordance with the provisions of these Regulations, the authorisation is deemed to be granted (tacit approval) by the Council, unless different arrangements are in place.

The Council considers that it would not be in the public interest, for reasons of public safety, for tacit approval to apply with regards to applications for sex establishments.

The Regulations also state that any charges (fees) provided for by a competent authority, which applicants may incur under an authorisation scheme, must be reasonable and proportionate to the cost of the procedures and formalities under the scheme, and must not exceed the cost of these procedures and formalities.

The Regulations suggest that all fees within the scope of the Directive be separable in two parts.

Firstly, the pre-application costs; mainly the administrative costs incurred when dealing with the application from when it is first received up until it being determined (issued/refused).

Secondly, the on-going costs; monitoring and enforcing the terms and conditions of that licence. This is to show clearly which part of the fee is repayable should an application (applicant) be unsuccessful.

Crime & Disorder Act 1998

Under this Act, Local Authorities must have regard to the likely effect of the exercise of their functions, and do all that they can to prevent crime & disorder in their area. This policy will have regard to the likely impact that the granting of licences may have on related crime and disorder in the city.

Part 6 – THE PROCESS OF APPLYING FOR A LICENCE

Making an Application

The Act provides a maximum licence period of one year. The Authority may grant a shorter licence if it sees fit. A shorter period may be granted for example, where a licensee wants a licence for a limited period for a trade exhibition or a show.

An application for the **grant, variation, renewal** or **transfer** of a licence must be made in writing to the Licensing Authority together with the application fee in accordance with the requirements set out below.

There are three separate notice requirements:

[1] The applicant must, within seven days after the date of the application, publish an advertisement in a local newspaper circulating in the local authority's area. A suggested form of advertisement is available on request from the Licensing Section.

[2] Where the application is in respect of a premises, the applicant must display a notice of the application on or near the premises where it can be conveniently read by the public. The notice must be displayed for 21 days starting with the date of application. Again a suggested form of notice is available on request.

[3] The applicant must send a copy of the application to the Chief Officer of Police no later than seven days after the date of the application. Where the application is made electronically it is for the local authority itself to send the copy within seven days of receipt of the application.

The application form can be used for grant, variation, transfer and renewal applications. Applicants must provide their name, address, age (where the applicant is an individual), the premises address and the proposed licensed name of the premises.

Applicants must, at the time of submission of a new grant, renewal or variation application, provide:

- a scheme showing the exterior design for consideration by the Licensing Authority before the premises are opened for business in order to ensure that exterior design of the premises.
- details as to the exact nature, extent and scope of the business for consideration by the Licensing Authority.
- a plan showing the interior layout of the premises and where relevant entertainment will take place for consideration by the Licensing Authority (SEVs only).
- a copy of the codes of practice for performers, the rules for customers and the policy of welfare for performers (SEV's only). Such documents will form part of the licence (if granted) and may be subject to amendment by the Licensing Authority prior to approval.

Officers of the Licensing Authority may, as part of the application process, visit the relevant locality of the premises to establish whether there are any characteristics of the locality which may require consideration by the Licensing Committee.

Objecting to Applications

The Act permits a wide range of persons to raise objections about the **grant, renewal, variation** or **transfer** of a licence. Objectors can include residents, resident associations, trade associations, businesses, Councillors or local MPs. South Yorkshire Police are a statutory consultee for all applications.

Objections must be made in writing (email is acceptable) no later than 28 days after the date of the application to the Licensing Authority and should include the following:

- the name and address of the person or organisation making the objection;
- the premises to which the objection relates;

- the proximity of the premises to the person making the objection, a sketch map or plan may be helpful to show this⁴

Objectors should limit their objection to matters which are relevant to the statutory grounds for refusal as set out in the Act. The relevant grounds of objection are:

- That the applicant is unsuitable to hold a licence;
- That the licence, if granted, would be carried on for the benefit of person/s who would be refused a licence if they had applied themselves;
- That the layout, character or condition of the premises are inappropriate for the proposed establishment;
- That the use of the premises as a sex establishment would be inappropriate due to the use of premises in the vicinity;
- That the use of the premises as a sex establishment would be inappropriate due to the character of the relevant locality; and / or
- That the number of sex establishments or sex establishments of a particular type is inappropriate in the relevant locality.

Any objections received by the Licensing Authority which do not relate to the grounds set out in the Act will be rejected by the Licensing Authority.

Objections will be considered by the Licensing Sub-Committee determining the application. The applicant will be informed of any objections received in respect of their application and the objection(s) will become public documents. (However, objector's personal details such as name, address and telephone number will be removed.)

A copy of the hearing procedure will be sent to the applicant and any objectors prior to the hearing.

Determination of Applications

All applications for the grant of a sex establishment licence will be determined by the Licensing Committee or Sub-Committee.

Valid objections to any application will be considered by the Licensing Committee or delegated to a Licensing Sub Committee at the hearing to consider the application. Applicants and objectors will be given an equal opportunity to state their case in accordance with the Licensing Committee's procedure for hearings, which is available from the Licensing Service.

The Act provides five mandatory grounds and four discretionary grounds for refusal of a licence. Each application will be decided upon its own merits and the Licensing Authority will give clear reasons for its decisions. Any decision to refuse a licence MUST be relevant to one or more of the following grounds:

⁴ [Why is it necessary to include this? Proximity to the proposed club not only identifies the objector's location but also creates more work for Licensing as this information would have to be redacted. Given the incomplete redactions of in the 2019 objections, this requirement puts objectors at risk and will act as a deterrent.](#)

MANDATORY GROUNDS FOR REFUSAL

Specific mandatory grounds for refusal of a licence are set out in paragraph 12(1)(a to e) of Schedule 3 in the 1982 Act. A licence cannot be granted:

- (a) to any person under the age of 18 years;
- (b) to any person who is for the time being disqualified due to the person having had a previous licence revoked in the area of the appropriate authority within the last 12 months;
- (c) to any person, other than a body corporate, who is not resident in an EEA State or was not so resident throughout the period of six months immediately preceding the date when the application was made; or
- (d) to a body corporate which is not incorporated in an EEA State; or
- (e) to any person who has, within a period of 12 months immediately preceding that date when the application was made, been refused that grant or renewal of a licence for the premises, vehicle, vessel or stall in respect of which the application is made, unless the refusal has been reversed on appeal.

DISCRETIONARY GROUNDS FOR REFUSAL

The only discretionary grounds upon which the Council may refuse an application for the grant or renewal of a licence on one or more of the grounds specified in Schedule 3 paragraph 12(3) are that:

- (a) the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reasons;
- (b) if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant, renewal or transfer of such a licence if he/she made the application himself/herself;
- (c) the number of sex establishments, or of sex establishments of a particular kind, in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for the locality;
- (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; or
 - (iii) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

Appeals

There is a right of appeal to the Magistrates' Court against decisions for the refusal to grant, renew, vary or transfer of a licence, the imposition of conditions and revocations may also be appealed.

Appeals must be made to the Magistrates Court within 21 days, starting from the date the applicant is notified of the Licensing Authority's decision.

It is important to note that appeals only lie against the mandatory refusals on the basis that the mandatory ground does not apply to the applicant/licence holder. Further, no appeal lies against the Licensing Authority's decision made on the discretionary grounds namely:

- that it is inappropriate to grant or renew a licence on the grounds of the character of the locality or the number of premises in it; or
- the use of premises in the vicinity or the layout, character or condition of the premises.

The only discretionary grounds against which an appeal lies are those relating to the suitability of the applicant, the manager and/or the beneficiary of the operation.

There is no right of appeal to the Magistrates' Court for the police or objectors.

Part 7 - POLICY

Discretionary Grounds a & b: SUITABILITY OF THE APPLICANT, MANAGER & BENEFICIARY

The Licensing Authority needs to be satisfied of the suitability of the following persons relevant to the application:

- (a) the applicant;
- (b) each of the partners (if a partnership);
- (c) each of the directors, secretary or other persons (if applicant is a company);
- (d) each of the managers;
- (e) each person the business will benefit. This includes third parties such as funders and suppliers where the arrangements are not on normal arm's length commercial terms or any persons who may share in the profits.

The provision of a management structure as part of the application will assist the Authority in determining suitability.

In order for the Licensing Authority to be satisfied that the relevant individuals are suitable to operate a sex establishment, a "Disclosure Scotland" certificate that is dated no earlier than 5 weeks prior to the application being submitted should accompany the application.

Where the relevant individuals have convictions for:

- (a) dishonesty;
- (b) violence;
- (c) sexual offences;
- (d) drugs;
- (e) public order; or
- (f) people trafficking;

it is unlikely that a licence will be granted.

Further,

- if the applicant has previously been involved in running an unlicensed sex establishment; or
- if the licence were to be granted, the business to which it relates would be managed by or run for the benefit of a person other than the applicant who would be refused the grant of such a licence if they made it themselves;

the application will likely be refused.

The Licensing Authority needs to be satisfied that those applying for a licence for a sex establishment (individuals detailed above) are suitable to operate the business by ensuring:

- (a) that the operator is honest;
- (b) that the operator is qualified by experience to run the type of establishment in question;
- (c) that the operator fully understands the licence conditions;
- (d) that the operator is proposing a management structure which will deliver compliance with licence conditions;
 - i. managerial competence;
 - ii. attendance at the premises;
 - iii. a credible management structure;
 - iv. enforcement of business rules (internal) through training and monitoring;
 - v. a viable business plan (e.g. sufficient to employ door staff and install CCTV (SEV only)); and
 - vi. existing policies in place for the welfare of staff, performers and patrons (SEV only)
- (e) that the operator will act in the best interests of the staff and performers, in how they are remunerated, the facilities they enjoy, how they are protected and how and by whom their physical and psychological welfare is monitored (SEV only).

It is anticipated that the above expectations will be demonstrated by the operator through their completed application form, accompanying documentation, and disclosure certificates as part of the application process.

Discretionary Ground c) NUMBER OF SEX ESTABLISHMENTS

The Act allows local authorities to impose numerical control on the number of sex establishments within a particular location. This can be to the number overall and the number of each kind and allows that the appropriate number may be nil.

This Policy does not specify any limit on sex establishments.⁵

Each application must in any event be considered on its merits at the time the application is determined by the local authority.

Discretionary Ground d) LOCATION

The Act permits applications to be refused:

- i. where the grant would be inappropriate having regard to the character of the relevant locality;
- ii. where the grant would be inappropriate having regard to other premises in the vicinity;
- iii. on the basis of the layout, character or condition of the premises.

1. Character of the relevant locality

The Licensing Authority will have regard to, but not limited to, the following:

- (a) the fact that the premises are sited in a residential area;
- (b) the premises are sited near shops used by or directed to families or children, or on frontages frequently passed by the same;
- (c) the premises are sited near properties which are sensitive for religious purposes e.g. synagogues, churches, mosques, temples;
- (d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;
- (e) the premises are sited near places and or buildings of historical/cultural interest and other tourist attractions.
- (f) the premises are sited near civic buildings.

The Council will consider the extent of the relevant locality on a case by case basis taking into account the particular circumstances of each case. However, the Council will not seek to define locality as the whole of the Council's administrative area or on a ward by ward basis.

ii) Use of other premises in the vicinity

The Licensing Authority will have regard to, but not limited to, the following:⁶

- (a) schools, nurseries, [youth centres](#) or other premises substantially used by or for children under 18 years of age;
- (b) parks or other recreational areas designed for use by or for children under 18 years of age [and access routes to and from the same](#);
- (c) places primarily used for religious worship;
- (d) hospitals, mental health or disability centres, substance misuse treatment centres, sexual exploitation services, sexual abuse centres or similar premises;
- (e) any central gateway to the city or other city landmark, historic building, [museums](#), [art galleries](#) or tourist attraction;

⁵ [We recommend a nil cap, in line with Rotherham and other local authorities adopting a nil cap. If as a city we are working to achieve white ribbon status we need to be working towards a nil cap](#)

⁶ [This is weaker than in the 2011 policy and we recommend the wording from the 2011 policy be retained: The Council will not licence premises that it feels are in close proximity to etc. See notes at the end of this policy](#)

- (f) predominately⁷ residential areas [including sheltered accommodation and student accommodation](#); and
(g) The Cultural Hub (Millennium Galleries, Tudor Square, theatres and library), [the Cultural Industries Quarter, any cultural area](#).⁸

Whether a premises is in close proximity to the above will be a matter of fact in each individual case and cannot be determined by reference to a fixed distance. What constitutes a city landmark, historic building, tourist attraction or cultural area will be determined by the Licensing Authority on a case-by-case basis, after hearing from the parties.⁹

The nature of the premises and the opening hours of the premises will also be considered in relation to the above.

In the case of renewal applications, the fact of whether development has occurred since the premises have been in operation will be considered. Applicants are advised to be aware of new developments occurring in the area of their premises and detail in renewal applications how negative impact on new developments may be mitigated.

Licences will be refused if the Licensing Authority perceives a venue will have negative impacts on members of the public or vulnerable persons living, working or engaged in normal activity in the area.¹⁰

The Licensing Authority will also consider the following factors when deciding if an application is appropriate:

- (a) any cumulative adverse impact of existing sex establishment related activities in the vicinity of the proposed premises;
- (b) proximity to areas with high levels of crime;
- (c) whether the premises has met the relevant planning requirements;
- (d) the design of the premises frontage (signage/images etc.);
- (e) any relevant representation to the application; and/or
- (f) the proposed operating hours.

iii) Suitability of the Premises

The Council expects:

- when an application for a licence at a permanent commercial property is made, the applicant will be able to demonstrate that the layout, character and / or condition of the premises is appropriate to the relevant entertainment proposed at the premises.
- when an application for a licence at a permanent commercial property is made, that property should have the appropriate planning and building regulation consents.
- the applicant to consider and detail in any application, the visible and physical impact of the premises including any external signage, advertising or displays.

CONDITIONS

The Licensing Authority recognises that all applications should be considered on an individual basis and any condition attached to a licence should be necessary, proportionate and tailored to the individual premises.

The Licensing Authority is permitted under The Act to make regulations prescribing standard conditions.

⁷ [Remove 'predominantly'](#)

⁸ [If these additions are **not** made, then the committee is requested to justify why SEs are inappropriate near Millennium Galleries etc but not near the Site Gallery, Showroom and other proposed places for the CIQ?](#)

⁹ [This has not happened in practice where in the Spearmint Rhino case, the QC has relied heavily on the Cultural Hub definition](#)

¹⁰ [Again, this has not happened in practice \(2018\). Here the word "perceives" is used whereas in practice, the sub-committee has always defended its decisions on the basis of evidence of harm/negative impacts.](#)

The standard conditions that may be attached on an individual basis to a sex establishment licence are available from the Licensing Service. ¹¹

The Licensing Authority reserves the right to grant and/or renew a licence on such terms and conditions, and subject to such restrictions as may be so specified in each individual case/application.

Any applicant not wishing to be bound by the standard conditions will need to state so in the application and provide justification as to why they should not apply.

REPRESENTATIONS

The Act allows any person to submit representations about the application of a sex establishment licence.

WAIVERS

Schedule 3 of The Act makes provision for the Council to grant a waiver from the requirement to hold a sex establishment licence in any case where it considers that to require a licence would be unreasonable or inappropriate.

A waiver may be for such a period as the Council thinks fit.

Each application will be considered on its own merits by the Licensing Committee.

In light of the exemption in relation to the provision of relevant entertainment on an infrequent basis, the Council takes the view that waivers are unlikely to arise in relation to relevant entertainment and would only be considered in exceptional circumstances.

Part 8 – SAFEGUARDING AND PUBLIC HEALTH

Safeguarding

The licence holder will ensure that all members of management and staff attend training regarding safeguarding children, vulnerable adults and licensing.

This training is provided in partnership by the Sheffield Safeguarding Board and Adult Safeguarding Partnership with the Licensing Authority. Such training is designed to support management and staff to recognise vulnerability and take appropriate safeguarding actions. This will include training to implement an age verification scheme and how to recognise and respond to vulnerable adults, as employees or customers. The training will also include a session regarding licensing law, conditions and expectations.

An appropriate member of the premises management must be assigned to act as the Safeguarding Coordinator. This person should act in accordance with the guidance and training provided by the local safeguarding children/adults boards.

Public Health

Holders of sex establishment licences must display and make available, without charge, literature on matters relating to:

- sexual health,
- the prevention of sexually transmitted diseases and HIV,
- mental health;
- substance misuse; and
- information about local health services as may be supplied to them by relevant local bodies.

¹¹ [Recommend having the conditions stipulated as an appendix as the minimal standard – see Southend-on-Sea, Manchester etc, particularly in light of recent breaches at Spearmint Rhino](#)

This information must be made available to patrons, employees and performers. Licence holders must have health and safety policy measures in place that reduce the risk of violence to staff.

Part 9 - ENFORCEMENT

Licensing Service Principles of Enforcement:

- **Open:** The Licensing Authority will provide information in plain language and will be transparent in the activities it undertakes. It will also be clear with customers on how the service operates.
- **Helpful:** The Licensing Authority will work with licensees to advise and assist with compliance. A courteous and efficient service will be provided by all staff, and licensees will have a single point of contact and telephone number for further dealings. Applications will be dealt with promptly and where possible, enforcement services will operate effectively to minimise overlaps and time delays.
- **Proportionate:** The Licensing Authority will minimise the costs of compliance for licensees by ensuring any action taken is proportionate to the risks involved; an account of the circumstances and attitude of licensee will be considered at all times.
- **Consistent:** The Licensing Authority will carry out all duties in a fair, equitable and consistent manner. Licensing officers will exercise judgment in all cases and arrangements will be put in place to promote consistency.

The Licensing Authority will also provide a well-publicised, effective and timely complaints procedure that is easily accessible to licensees and members of the public alike.

Advice given by licensing officers on behalf of the Licensing Authority will be put clearly and simply at all times and confirmed in writing.

The Licensing Authority will also ensure that before action is taken as a result of enforcement or compliance checks, an opportunity to discuss the circumstances will be provided in order to resolve the points of difference. However, in circumstances where immediate action is necessary, such as health and safety or preventing evidence being destroyed, the Licensing Authority will be required to take a more formal approach. An explanation as to why such action was required will be given at the time and confirmed in writing, in most cases within five working days and, in all cases, within 10 working days.

Better Regulation Delivery Office: Regulators' Code 2014

In undertaking enforcement duties, the Licensing Authority will pay particular attention to the Regulators' Code. This sets out the standards that the Licensing Authority should follow when undertaking compliance and enforcement checks. Therefore the Licensing Authority will:

- carry out their activities in a way that supports those they regulate to comply;
- provide simple and straightforward ways to engage with those they regulate and hear their views;
- base their regulatory framework activities on risk;
- share information about compliance and risk;
- ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply; and
- ensure that their approach to their regulatory activities is transparent.

The Licensing Authority will work very closely with South Yorkshire Police and the Planning Service and look to establish task teams to deal with problem premises.

Complaints

The Licensing Authority does understand the difficulty for some residents to follow up issues with particular premises due to concerns for their safety. In these circumstances, residents should contact the Licensing Service, their local Councillor or South Yorkshire Police who may assist them in these matters.

The Licensing Authority and South Yorkshire Police will work closely in order to ensure consistency, transparency and proportionality in their enforcement activities. They will continue to investigate complaints and conduct proactive enforcement exercises to ensure that licences and the conditions attached to the authorisations are complied with and that unlicensed activity is dealt with as appropriate to ensure the highest standards of licensees and premises in the city of Sheffield.

The Licensing Authority will investigate general complaints regarding premises. This will allow us to give an early warning to licence holders of any concerns identified at their premises and the need for improvement.

They may call on other relevant authorities to assist in the investigation of complaints or in formulating action plans for improvement.

Data Sharing

Subject to the provisions of the Data Protection Act 2018, the Licensing Authority and police will share information about licensees, licensed premises and activities associated with them. Further open access to data will be given to those police officers and Licensing Authority officers discharging their functions under this Act.

Part 10 - PARALLEL CONSENT SCHEMES

The Licensing Act 2003 (the 2003 Act)

If a sex establishment wishes to also carry on other licensable activities under the 2003 Act, i.e. the sale of alcohol, the provision of regulated entertainment or the provision of late night refreshment, they will also require a premises licence, club premises certificate or temporary events notice.

In practice, most sexual entertainment venues will require both a sexual entertainment venue licence for the provision of relevant entertainment and a premises licence for the sale of alcohol or provision of regulated entertainment.

Applicants and interested parties are advised to read Sheffield City Council's current Statement of Licensing Policy in conjunction with this policy.

Planning and Building Regulation Control

Applicants must ensure that they have the appropriate planning permission in place to operate their business.

The Council's licensing functions will be discharged separately from its functions as the "Local Planning Authority". However, the Licensing Authority recognises the need for the two services to work in partnership.

Therefore, the Licensing Authority requires that applicants for a premises licence and/or variations under this legislation to have already obtained any necessary planning consent. This helps to avoid unnecessary confusion within the local community.

Applicants should also be aware that Building Regulations may apply where the proposal involves building work or where the use of the building is changed. You are advised to contact Building Control for further guidance.

ADDITIONAL NOTES ON LOCATION

"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; b) a park or other recreational area used by or for children under 16 years of age; c) a church or other place of religious worship; d) a Hospital, Mental Incapacity or Disability Centre or similar premises; e) the Cultural Hub of the City (i.e. close to the Peace Gardens and Tudor Square etc.); and/or f) a central gateway to the city or other city landmark, historic building or tourist attraction. Whether a premises is in close proximity to the above will be a matter of fact in each individual case and cannot be determined by reference to a fixed distance. Matters that will be taken into account are the visible and physical impact of the premises, any advertising or displays and its customers both from the place in question but also to people entering or leaving. It will be for the Licensing Authority to determine what at any time constitutes the Cultural Hub of the City as well as any central gateway, landmark, historic building or tourist attraction. Applicants can contact the Licensing Section for advice in individual circumstances about whether a location is likely to require referral to Licensing Committee. The Council will also consider the following factors when deciding if an application is appropriate:- a) cumulative adverse impact of existing sex establishment related activities in the vicinity of the proposed premises; b) proximity to areas with high levels of crime; c) whether the premises has met the relevant planning requirements; and/or d) the design of the premises frontage (signage/images etc. see paragraph 8 below). e) Any relevant representation and/or objection to the application."

As far as schools are concerned, this was weakened in the 2017 policy, which says:

- When considering the character of the relevant locality, the authority 'will have regard to...the fact that... the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments...', and
- When considering the use of other premises in the vicinity, the authority 'will have regard to... schools, nurseries or other premises substantially used by or for children under 18 years of age...'

So it is much more discretionary which effectively means that you can just have regard to it and then go ahead anyway.

Sheffield

Not Buying It

**Why strip clubs are incompatible with equality
between the sexes**

'To be treated with dignity is one of the foundations of human rights. To what extent can women claim respect in societies where there are extensive and increasingly legitimised, sex industries? Treating a human being as a 'thing' a commodity, means that they are denuded of humanity such that abuse becomes acceptable.'

Prof Liz. Kelly, Equality and Diversity Forum Seminar, London 2006

CONTENTS

	Page
Introduction	3-4
1. HARM AND THE MEANING OF MORAL OBJECTIONS	4
1.1 Who does not consider SEVs to be harmful	4-5
1.2 What is meant by harm?	5
1.3 What constitutes a moral objection	5-6
2. THE IMPACT OF SEVS ON ALL WOMEN	6
2.1 Gender inequality	6-7
2.2 Sexual harassment	7-8
2.3 Impacts on performers	8-10
2.4 The impacts on relations between the sexes	11-12
2.5 The impacts on women's freedom of movement	12-13
3. EVIDENCE THAT SEVS REDUCE EQUALITY AND PROVIDE A CONDUCTIVE CONTEXT FOR VIOLENCE AGAINST WOMEN	14
3.1 Violence against women and girls	14-20
3.2 Modern policy approaches to prevent violence against women and girls	20-21
3.3 A culture of harm	21-23
4. ARGUMENTS IN FAVOUR OF STRIP CLUBS	23-26
5. LEGAL MATTERS	26-29
5.1 Background	26-28
5.2 PSED	28-29
6. ADDITIONAL CONSIDERATIONS	30
7. OTHER LICENSING ASPECTS	30
8. IN CONCLUSION	31
REFERENCES	32-37
Appendix 1 – Objectification research – an example	38
Appendix 2 – Quotes from former dancers reflecting on their experiences	39-41
Appendix 3 – Reviews of Spearmint Rhino Sheffield by customers	42-45

Introduction

1. Many who support the strip industry or believe it to be harmless argue that those of us who oppose it should simply not visit strip clubs. This is a wilful denial of the wider impacts of this industry as this paper evidences.
2. This paper builds on the previous work of Zero Option and draws together all extant literature and research into the to evidence that:
 - # Sexual Entertainment Venues (SEVs) are a form of violence against women – all women. They serve to objectify women and condone the buying of women and their licensed operation within a community effectively endorses this. Evidence-based research has exposed the links between alcohol and violence against women and that violence is mediated by the degree to which the perpetrator sexually objectifies women.
 - # In forming any SEV Policy related decisions, including the granting of licences, a local authority is legally obliged to pay regard to its obligations under the Public Sector Equality Duty (PSED). SEVs do not foster good relations between the sexes and perpetuate unequal power relations between the sexes and as such perpetuate gender inequality. Thus SEVs are incompatible with the PSED.
 - # If any local authority intends to reduce violence and discrimination against women, then it MUST set a nil cap to the number of SEVs it will permit in the city.
3. A 2016 report published by the Fawcett Society states:

‘There is a strong bedrock of support for equality between men and women – in 2016 it’s time to speed up the pace of change and ensure we aren’t waiting another 150 years to achieve it.’(p. 2)¹
4. This, combined with growing evidence that many men are eschewing the traditional stag night strip club outing and the growing number of license refusals² and nil caps being adopted by local authorities, indicate that strip clubs are increasingly recognised and understood to be sexist and antithetical to gender equality and the PSED.
5. As such, we urge the Council to acknowledge and respond to the growing body of research evidence about the harmful impacts of SEVs and to be part of this change thereby demonstrating that it is working in tandem with other parts of the Council to support the aims of Sheffield’s *Domestic and Sexual Abuse Strategy 2018-2022 Preventing violence, abuse and harassment is everyone’s business*³ to “work towards eliminating violence against women and girls.” (p.2) What has been alarmingly apparent at successive Spearmint Rhino licence renewal hearings over the years is the prevalence of sexual violence that women have been subjected to as adults and children (from both objectors, supporters, current and former dancers) which we know to be the tip of the iceberg as not all survivors will be comfortable with disclosing publicly.

¹ <http://www.fawcettsociety.org.uk/wp-content/uploads/2016/01/Sex-equality-state-of-the-nation-230116.pdf>

² <https://sevlicensing.wordpress.com/about/> see also Eden Lounge Exeter

<http://www.exeterexpressandecho.co.uk/exeter-strip-club-eden-lounge-loses-licence/story-27522405-detail/story.html>

³ Sheffield Domestic and Sexual Abuse Strategy 2018-2022 Preventing violence, abuse and harassment is everyone’s business available from: <http://sheffielddact.org.uk/domestic-abuse/wp-content/uploads/sites/3/2013/05/Domestic-And-Sexual-Abuse-Strategy-2018-2022-FINAL.pdf>

6. The Sex Establishment Policy must therefore align itself with the *Domestic and Sexual Abuse Strategy 2018-2022 Preventing violence, abuse and harassment is everyone's business* which rightly acknowledges in paragraph 3.3.1:

'The Government's Strategy focuses on Violence Against Women and Girls [5]. It states that inequalities that still exist between men and women are 'both a cause and consequence' [6] of violence against women and girls. The World Health Organisation states that 'often inequalities in gender increase the risk of acts of violence by men against women. For instance, traditional beliefs that men have a right to control women make women and girls vulnerable to physical, emotional and sexual violence by men. They also hinder the ability of those affected to remove themselves from abusive situations or seek support [7]'

7. Indeed, the above statement is corroborated by a recent study entitled 'Domination and Objectification: Men's Motivation for Dominance Over Women Affects Their Tendency to Sexually Objectify Women' (Baraket & Shnabel 2019) which concludes:

'The sexual objectification of women is a multifaceted phenomenon, influenced by various factors. While acknowledging the central role of adaptive forces (Buss & Schmitt, 1993) in shaping objectifying behavior toward women, sexual drives clearly are not the whole story. In line with the feminist observation that "to live in a culture in which women are routinely naked where men aren't is to learn inequality in little ways all day long" (Wolf, 1991, p. 139), in the present research, we demonstrated that the sexual objectification of women is also driven by the motivation for **men's dominance**.' (p.16) (emphasis added)

8. In a large study conducted recently in England with over a thousand young men aged 18-30⁴, over 25% (one in four) endorsed the opinion that "a real man" should have as many sexual partners as he can, and would never say no to sex. Meanwhile, 55% (more than half) said that this is what Society as a whole communicates to them. The young men who identified with these and other expressions of so-called "Man Box" masculinity were more likely to be depressed and to take part in risky behaviours. **54% of these young men reported having perpetrated sexual harassment against a woman or girl in the last month**, compared with 9% of young men or boys who did not identify with the harmful "Man Box" stereotypes of masculinity. Research also shows that power (dominance) and sex are interconnected in the minds of those who are the most likely to sexually harass (Maass, Cadinu & Galdi (2013). SEVs reinforce the connection between power and sex.

1 HARM AND THE MEANING OF 'MORAL' OBJECTIONS

1.1 Who does not consider SEVs to be harmful?

- # SEV owners/managers
- # Some current performers in SEVs
- # Some sex worker rights activists
- # Some clients of SEVs - We argue 'some' with reference to recent research⁵ highlighting male gendered expectations to attend strip clubs but which were not enjoyed by all attendees. We also have heard from men who felt pressurized to go to strip clubs and felt uncomfortable in the environment and did not welcome the attention of performers. In addition to this it was

⁴ Heilman, Barker & Harrison (2017)

⁵ Briggs, D. & Ellis, A. 2016 Deviant Behavior, pp. 1-12 *The Last Night of Freedom: Consumerism, Deviance and the Stag Party*

reported in December 2016⁶ that ‘According to figures released by professional stage [sic, should read ‘stag’] do specialists *The Stag Company*, there has been a 47% drop in lap dancing requests.

Some members of the public

1.2 What is meant by ‘harm’?

1.2.1 The harmful impacts of SEVs expressed by objectors are frequently dismissed as a ‘moral’ issue and therefore not relevant considerations. For example, it was reported in the *Sheffield Telegraph* when Wildcats SEV was refused planning permission that ‘Some critics claimed a sex-orientated venue would put the safety of women at risk, but officers said their recommendation was based on the impact on the area, not on moral grounds’⁷

1.3 What constitutes a ‘moral’ objection?

1.3.1 A pervasive problem is that the meaning of ‘moral’ is not defined in statute, guidance or in the current and quashed policies. However this cannot justify a blanket dismissal of objections regarding harmful and other negative impacts of SEVs.

1.3.2 In the preface to his book, *Sex Licensing* (2010), the authoritative guide to sex licensing, Phillip Kolvin QC refers to the aim of Parliament in setting the now current legislation on SEV licensing⁸ as being based on:

‘... a conviction that communities should have a choice as to how many, if any, sex establishments should be in their locality, and **that it should not be necessary for such communities to demonstrate harm** in order to win an exercise of discretion in their favour.’ (emphasis added)

1.3.4 Kolvin refers to historical distancing of decision-making from choices based on:

‘a moral view as to the juxtaposition of sex and other community uses’

but suggests that:

‘In a modern context, therefore, for ‘morality’ read ‘community values’, a less loaded concept altogether’ (p. x).⁹

1.3.5 Thus Kolvin makes clear that it is a fundamental guiding principle that communities should be able to exercise choice about the number (if any) of sex establishments in their locality based on their own values, i.e. the subjective values of the people in the community, in their full range and variety, rather than having these diverse considerations dismissed as invalid ‘moralising.’

1.3.6 Local authorities Council have a fundamental and non-delegable role to give due regard to the Public Sector Equality Duty, including tackling gender inequality. This applies notwithstanding

⁶ Loaded 28th November 2016 *Lap Dancing Bookings Down As Stag Dos Focus On Less Seedy Alternatives*
<http://loaded.co.uk/lap-dancing-bookings-down-as-stag-dos-focus-on-less-seedy-alternatives/>

⁷ <http://www.sheffieldtelegraph.co.uk/news/no-wildcat-action-as-lap-dance-venue-in-sheffield-is-blocked-1-5454560>

⁸ Policing and Crime Act 2009 <http://www.legislation.gov.uk/ukpga/2009/26/contents>

⁹ Kolvin, P (2010) *Sex Licensing*, The Institute of Licensing

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. About this Kolvin observes:

‘The role of gender equality is not well understood, and it is far less well carried through, in licensing processes. However, gender equality may well influence decision making under LGMPA’ (p. 86).

1.3.7 As the judge in the first of the thus far, two judicial reviews observed when granting permission:

‘There is a tenable basis for the Claimant’s inference that the Defendant has wrongly ignored objections based on the potential impact on gender equality, treating them as moral objections and irrelevant.’¹⁰

2 THE IMPACT OF SEVs ON ALL WOMEN

2.1 Gender inequality

2.1.2 A former lap dancer “Elena” told the *Guardian*:

‘The men just see you as an object, not a person, and whether you are equally engaged in their desire is irrelevant.’¹¹

2.1.3 Another former lap dancer named Lucy stated:

‘... I truly believe that the reason men pay for lap dances is not because they are titillated visually by the sight of a naked woman, or even because the sexual contact is particularly stimulating. They do it because they get a power rush from the act of paying a woman to take her clothes off. She is vulnerable and he is powerful, and that’s the real allure-that’s the real reason the clubs are getting so popular. **Lap-dancing clubs are places in which you can all pretend that feminism never happened.**’¹² (emphasis added).

2.1.4 Another former dancers states:

‘the idea that the sex industry is sex-positive and liberal [is] an absolute joke . . . [lapdancing clubs are] just **a manifestation of gender inequality.**’¹³ (emphasis added).

2.1.5 A journalist who investigated lapdancing clubs concluded:

‘It’s about an industry which relies entirely on women, yet grants its female employees [sic] few if any rights: in that sense an industry that’s stuck in the mindset of a pre-Equal Pay Act era.’

2.1.6 Further examples are provided in Appendix 2.

¹⁰ <https://www.john-gaunt.co.uk/news/sheffield-admits-failure-to-comply-with-equality-duty-over-spearmint-rhino-licence>

¹¹ The Guardian 19th March 2008 *I was seen as an object, not a person*
<https://www.theguardian.com/world/2008/mar/19/gender.uk>

¹² Cited in Banyard, K. (2016: p. 140) *Pimp State: Sex, Money and the Future of Equality*. Faber and Faber, London

¹³ Hayashi Danna (author of the book *Stripped: The Bare Reality of Lapdancing* (2011)) cited Banyard, K. 2016 *Pimp State: Sex, Money and the Future of Equality*. P. 140

2.2 Sexual harassment

2.2.1 There is no reporting structure for sexual harassment and 'sexual harassment is not an offence in its own right'¹⁴, such is the normalisation and minimisation of this form of violence against women. As the 2018 report produced by the Women and Equalities Committee into sexual harassment in public spaces observed:

'This report confronts some deeply uncomfortable truths within British society that we cannot side step if we are to tackle the issues raised by #MeToo and broader sexual harassment in the long term. The truth is we have to question the attitudes some men hold towards women. These attitudes are damaging women's opportunity to be on an equal footing in society. These are not new problems but they are problems we cannot continue to ignore.'¹⁵

2.2.2 Research conducted by Dr Maggie Wykes at the University of Sheffield¹⁶ found that the emotional after-effects of an [sexual harassment] incident are: uncomfortable 80%; frightened 40%; angry 60%; embarrassed 50%; disgusted 45%. The biggest behavioural responses to the experience were: avoid going out at night; avoid going out alone; try to change appearance. When asked if they had told anyone, 70% had told a friend. When asked if they had reported the harassment to the police, responses were: 70+% thought it was not serious enough; 16% were too embarrassed; 22% didn't think anyone could help. Nottinghamshire Police is now recording such harassment as a misogynistic hate crime.¹⁷

2.2.3 Sexual harassment is a commonplace experience in women's everyday lives (see for example the Everyday Sexism Project¹⁸) and women do not expect to be taken seriously if they do report it (indeed, 85% of *rapes* are never reported¹⁹ and a sizeable proportion of women say this is because they fear being treated disrespectfully and/or being disbelieved).

2.2.4 The same disbelief and dismissive attitude is often expressed when women object to the presence and existence of SEVs and voice their fears of sexual violence. Yet women are caught in a double bind of being denigrated for moderating their movements to avoid sexual assaults and victim blamed for putting themselves at risk when attacked.

2.2.5 There are two undermining flaws in seeking case-based evidence of harm to individual women in this context, as in others. Firstly, violence against women prevalence data bear very little relation to reported crime statistics (and prevalence surveys do not question victims about connections with SEVs). Secondly, the issue is primarily mediated culturally with most of the harmful impacts not located physically near SEVs. For example, more recent research has centered on reports from ex-performers and has started to examine attendance at SEVs when investigating perpetrators of violence against women as outlined below.

¹⁴ Communication from SYP 11th January 2017

¹⁵ https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/701/70104.htm#_idTextAnchor005

¹⁶ Publication pending

¹⁷ BBC News *Nottinghamshire Police records misogyny as a hate crime*. 13th July 2016 Available from: <http://www.bbc.co.uk/news/uk-england-nottinghamshire-36775398>

¹⁸ <http://everydaysexism.com/>

¹⁹ See Rape Crisis England and Wales who cite the Crime Survey England and Wales statistics from 2013 <http://rapecrisis.org.uk/statistics.php>

2.2.6 A recent research study in the USA (Decker et al. 2017)²⁰ concluded in a literature review that the SEV environment itself “can enable violence victimization and pose barriers to engagement with the public infrastructure for justice and violence-related care”. Club management is inevitably invested in ensuring that violence experienced by performers is not necessarily reported to outside agencies. It is worth reflecting that given what is known about the high prevalence of client violence towards performers, we should expect responsible management to be supporting performers to make regular reports to police and other agencies about assaults and threats as this is a serious safeguarding concern. An absence of such reports is concerning and in fact, we have heard via informal networks from those who have direct contact with women working at Sheffield’s only strip club, that acts of sexual violence are perpetrated yet not a single FOI to either South Yorkshire Police or the Council has shown a single report made.

2.2.7 Indeed, the culture of non-reporting was confirmed by a current stripper at Sheffield’s Spearmint Rhino who spoke at a conference on decriminalising the sex trade, in Sheffield in August 2019. She spoke of how difficult it is to report to the police because of risk of the club’s loss of licence. However, we note that there has been a second reported rape that has resulted in a charge at Sheffield’s other SEV, La Chambre. The first known one resulted in a 5 year conviction²¹ and the second charge is pending trial.²²

2.3 The impacts on performers

2.3.1 There is a small number of women who earn some money by working as performers in the SEV industry.

2.3.2 There are other views in addition to those already cited, that are in the public domain, primarily those gathered by former dancer Jennifer Hayashi Dadds in research for her 2011 book²³ and those gathered in a consultation run by Object²⁴. A further example is:

‘It was not a “gentleman’s” club and I failed to understand what was so gentlemanly about an intoxicated man using derogatory language towards me, pestering me for sex and getting off on my naked body.’²⁵

2.3.3 Performers at the clubs are self-employed women, while others who work in SEVs (e.g. bar and door staff) tend to have employment contracts with associated job security and privileges. Research shows that women who work in SEVs are subject to high levels of abusive behaviour by customers; research in the U.S. (Holsopple 1998)²⁶ found that 100% of the women working in

²⁰ Farley, M., Golding, J.M., Schuckman Matthews, E., Malamuth, N.M. & Jarrett, L. (2015). Comparing sex buyers with men who do not buy sex: New data on prostitution and trafficking. *Journal of Interpersonal Violence* 32(23), 1-25.

²¹ Sheffield Star: Man jailed for Sheffield Halloween Party Rape, 3rd September 2104 available from: <https://www.bbc.co.uk/news/uk-england-south-yorkshire-29048226>

²² Sheffield Star: Man charged with rape at swingers club in Sheffield, 27th September 2019 available from: <https://www.thestar.co.uk/news/man-charged-rape-swingers-club-sheffield-637597>

²³ Jennifer Hayashi Dadds & Sandrine Leveque *Stripped: The Bare Reality of Lap Dancing* by

²⁴ Stripping the Illusion: the Lap Dancing Industry Exposed. <https://www.youtube.com/watch?v=Cwg57pLJZUI>

²⁵ Jennifer Hayashi Dadds & Sandrine Leveque *Stripped: The Bare Reality of Lap Dancing* by (p.13)

²⁶ Holsopple, K (1998) *Strip Clubs According to Strippers: Exposing Workplace Sexual Violence*, available online at <http://www.uri.edu/artsci/wms/hughes/stripc1.htm>

lap dancing who were surveyed reported that they had experienced physical violence from customers. All the women had been sexually abused and verbally harassed in the club. Sanders and Hardy in 2011²⁷ highlighted how almost half the SEV workers interviewed in their UK study reported frequent verbal harassment and unwanted touching from customers (in other words, sexual assault).

2.3.4 Breaches to the no contact rule are commonplace. In Sheffield, a total of 219 breaches were found by undercover investigators in 2019 on two visits to the club, yet none of these were picked up by unannounced council officer inspections. The breaches covered a range of sexually explicit language and sexual acts between performers in addition to simulated oral sex of the undercover investigators. This is by no means unusual and these acts were volunteered by the dancers and not requested by the men posing as customers. Details of the breaches can be found on Not Buying It's²⁸ website **and the full committee is urged to read them**. A further catalogue of breaches across the industry is listed on the same website.²⁹

2.3.5 However the reality is that this behaviour is frequently (a) tolerated/accepted and (b) not reported to the authorities. There are significant factors driving this toleration and non-reporting, including the financial incentive for performers to accept touching and other sexual contact, regardless of rules or their own feelings about it, in order to compete with other performers for custom in a context where they have to pay the SEV for the privilege of being able to perform, and such competition is driven by SEV managers arranging that there are more performers than customers. One former Sheffield Spearmint Rhino dancer told us that sexual assault from customers and management were frequent and that any complaint resulted with a "what do you expect, you're a stripper?" response. The Licensing objective the 'Prevention of crime and disorder' is just that, and must not be interpreted as the 'Prevention of specific types of crime and disorder which are reported to the police and acted on by the police'.

2.3.6 There is no reason to assume that all women working in SEVs are exploited, abused or unhappy or will be personally damaged by the experience. However:

- # Research from the USA has suggested that the longer women work in the industry, the more their feelings about it transform from "elation" into "anger, disappointment and disgust" (Barton 2002: 596). In her research with performers, Barton found that despite the fact that "individual women can experience dancing as liberating and rewarding, at least for a while", "Structurally, dancing is exploitative and destructive to women both as individuals and as a group" (p. 600).
- # As already stated, interviews in the UK with 197 performers revealed that 40% said that customers were rude or abusive towards them (Sanders & Hardy 2011). Almost half the women reported frequent verbal harassment and unwanted touching from customers (Sanders & Campbell 2012).
- # Those currently engaged in the sex trade are (unsurprisingly) critical of policy that seeks to end demand but those who have extricated themselves from it favour policy to end demand (Swedish Government, 2010). Before they do exit, current performers rationalise

²⁷ Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds Available from:

http://www.sociology.leeds.ac.uk/assets/files/research/Regulatory_Dance/FINALSUMMARYjAN2012.pdf

²⁸ <https://notbuyingit.org.uk/wp-content/uploads/2019/04/SR-Sheff-Press.pdf>

²⁹ <https://notbuyingit.org.uk/wp-content/uploads/2019/06/StripSleaze.pdf>

and attempt to neutralise the work by using three techniques: denying that there is harm; condemning those who are against lapdancing by characterising them in negative ways; and making claims about how the work serves a 'higher' purpose for them, for example supporting a family or paying for education (Thompson & Harred 1992). We also know this from having spoken to exited women.

- # Research has shown that managers use a range of "tactics" to manage performers through the economic precarity that is a feature of the work. These tactics, which we have seen employed in arguments in Sheffield licensing hearings, include "normalising uncertainty" reframing it as "flexibility" and using "one big happy family" discourses. Research also shows managers encourage performers to self-blame if they are not earning sufficient funds due to the payment and staffing structures put in place by the management in order to extract profit. Meanwhile managers benefit from the precarious 'self-employed' status of the performers because it means that managers avoid paying taxes on their income and performers are also unable to file claims for discrimination and are ineligible for employment benefits or compensation (Mount 2018). We have also heard from those who worked in the industry how managers use dancers' insecure status to manipulate and bully them as they have no rights.
- # It is possible that women working as lapdancers may be drawn from the more vulnerable in society and this is suggested in research as well as in testimony from exited performers. Forsyth & Deshotels (1997) found that drug and alcohol use by performers was "an integral part of the occupation", both making it possible to do the job and contributing to development of habits. Indeed in the 2018 Spearmint Rhino licence hearing, we heard from a former dancer and two testimonies of former dancers were read out which support this. The former dancer told the panel that alcohol abuse is common amongst dancers. At the 2019 hearing, current dancers present also discussed their vulnerabilities; one talked of being a survivor of sexual abuse and one of having suffered from anorexia. Decker et al. (2017) identified high levels of victimisation in domestic abuse (intimate partner violence) among performers and they also say: "Social and economic disadvantage and histories of substance use and incarceration are... common precursors to dancing." Again these experiences have been shared with panels by former dancers at the 2018 and 2019 hearings.
- # Sherman et al. (2017) found that 43% of performers in their study also reported selling sex (being involved in prostitution), of whom 92% began selling sex after they began to work in SEVs. Among the 50% who reported heroin or cocaine use, over half had initiated this drug use after they began to work in SEVs. Mount (2018) reported that every manager she spoke to in her research mentioned that performers often tried to sell more than they were supposed to, in the form of sexual acts or prostitution. Indeed reviews of Spearmint Rhino (see Appendix 3) suggests that this is the case in Sheffield as elsewhere.
- # A recent study (Johnson et al. 2018) found that objectification of the other sex is associated with **"severe psychological aggression and physical assault perpetration"** in males, but not in females. This demonstrates that males and females react differently to objectification of the other sex.

2.3.7 A summary of former dancers' own words reflecting on their experiences is provided in Appendix 2.

2.3.8 Guildford's nil cap policy makes reference to performers, stating that it: "recognizes that a nil per locality policy may reduce the employment opportunities for dancers. However it also recognises that those working in SEVs are often peripatetic and self-employed and will retain the opportunity to find employment as performers in other venues in Surrey or in other roles in the entertainment industry." We support this acknowledgement of the potential impact on performers of a nil cap policy but we suggest that should Sheffield wish to make a similar reference, it should not assume or judge that those who are currently working as performers are restricted to future work in the entertainment industry alone.

2.4 The impacts on relations between the sexes

The following quotes highlight how SEVs are antithetical to the fostering of good relations between the sexes:

"I always thought of the customers as vermin and, ironically, that is what they thought of me."

"You start to see men as nothing more than their wallets, idiots to be fleeced for as much as you can. You start to despise them for believing you when you flutter your eyelashes and tell them they're the most interesting customer that you've ever talked to."

"It's screwed up my view of men. Every time I see a man now, I just see him as a punter. There's only so many bad experiences you can have before you start hating them all . . ."

(former dancers)

2.4.1 The above views of former dancers about the customers axiomatically undermine gender equality and do not foster good relations between men and women. Again, views of former Sheffield Spearmint Rhino dancers have been shared with the panels in 2018 and 2019. As previously stated, as former lap dancer Jennifer Hayashi Danna tells Kat Banyard 'the idea that the sex industry is sex-positive and liberal [is] an absolute joke' and that lap dancing clubs like the one she used to work in are 'just a manifestation of gender inequality.'³⁰ Danna also highlights the link between men's dehumanisation of women performers in SEVs which runs counter to any notion of gender equality that any Council, or indeed any official body, claims to promote: 'a sex worker describes punters who came straight from lap dancing clubs as unwilling to acknowledge that women were human or individual . . . There was a very aggressive 'pack mentality' and they would . . . make very degrading comments about the way that women looked.'³¹

2.4.2 In their UK study published in 2011 Sanders and Hardy³² 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 the testimonies of former performers and which is of relevance to the Council's duty under equality legislation to have due regard to the need to foster good relations between men and women. Barton (2002, p.592) quotes a performer who had this to say about clients: "I guess they feel like the normal laws of etiquette that govern any other social or business interaction are suspended there. It is okay to call someone a bad name or use foul language. They'll say, "Turn around bitch, I want to see your ass. I'm paying." Just to talk to someone in a way you'd never in a million years think of talking to someone in any other business or social interaction... That's not something you have to contend with systematically in other jobs."

³⁰ Cited in Banyard, K. (2016: p. 140) *Pimp State: Sex, Money and the Future of Equality*. Faber and Faber, London

³¹ Guardian 10th November 2011 *The truth about life as a lap-dancer*. Available from: <https://www.theguardian.com/lifeandstyle/2011/nov/10/truth-lap-dancer-clubs>

³² Sanders, T., & Hardy, K. (2011) *The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings*. Leeds: University of Leeds

2.4.3 The afore mentioned former lap dancer “Elena” told the Guardian that ‘Lap-dancing reinforced all [her] negative beliefs about herself and about men. "The men just see you as an object, not a person, and whether you are equally engaged in their desire is irrelevant. **Increasingly, you learn to despise the men because of the way they perceive you.** Lap-dancing is about creating a situation whereby the men feel they are doing you a favour - that's the way the game is set up, so all the power is with the customer." She believes that for men who visit lap-dancing clubs, enjoyment derives primarily from handing over the money, not from the dance itself.³³ (emphasis added)

2.4.5 As these posters on a Digital Spy forum thread about strip clubs observe³⁴

The screenshot shows a forum thread with two posts. The first post is by user 'Andrew' (ID 309) dated 8 Feb 2012 11:55. The text of the post is: "I have observed the affect they have on my friends who see them as harmless. Their attitude to women has deteriorated over the years, now viewing women as objects to be bought and sold. One friend claimed it is harmless fun, a great way for a girl to pay her way through college. When I said he wouldn't mind then if his sister worked in one he soon changed his tune, says it all really." The second post is by user 'ladivina69' (ID 149) dated 8 Feb 2012 09:26. The text of the post is: "My daughter is a dancer and its not harmless fun. In order to bear dealing with this degrading and soul destroying work the girls drink too much and endure the worst aspects of male nature. She has become cynical, jaded and doesnt have relationships any more. She thinks that men are all untrustworthy and only after what they can get away with. Its not really a job to be proud of." Both posts have 'Report' and 'Link to' buttons and up/down arrows indicating replies.

2.4.6 There are also numerous threads on Mumsnet discussing the impact on their relationships when women discover that their partners have been to an SEV.³⁵

2.4.7 Several former performers have also spoken about the intense competitive nature between performers where they outnumber customers. This also does not foster good relations with other members of the female sex.

2.5 The impacts on women’s freedom of movement

³³ The Guardian 19th March 2008 *I was seen as an object, not a person*
<https://www.theguardian.com/world/2008/mar/19/gender.uk>

³⁴ <http://forums.digitalspy.co.uk/showthread.php?t=1464449>

³⁵ See for example: <http://www.mumsnet.com/Talk/relationships/a1775126-Strip-club;>
<http://www.mumsnet.com/Talk/relationships/1245716-DH-went-to-strip-club-last-night-3-dances-Am-I-stupid-naive-to-feel-so-sad-about-it> ; <http://www.mumsnet.com/Talk/relationships/a1775126-Strip-club;>
<http://www.mumsnet.com/Talk/relationships/a1626235-Husband-had-a-lap-dance> ;
<http://www.mumsnet.com/Talk/am-i-being-unreasonable/a2123339-Am-i-being-unreasonable-to-not-be-ok-with-my-husband-going-to-a-strip-club> and <http://www.mumsnet.com/Talk/relationships/a1726433-Am-I-over-reacting-Strip-club>

(NB: this is a sample- there are a lot more discussions on this topic)

2.5.1 In addition to the normalisation of the sexualisation of women, there is discrimination against women. As 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'³⁶

2.5.2 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'³⁷

which 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.'³⁸

2.5.3 An Australian article about women and girls' perceptions of safety in urban spaces highlights how they restrict their freedom of movement to avoid zones where there are strip clubs³⁹.

2.5.4 This fear of crime [ie sexual violence] is frequently expressed by a significant number of objectors to SEVs and different and new examples of women subjected to harassment from Spearmint Rhino's customers have been provided every year at each hearing and **we urge Licensing to collate these and provide them in full to the Licensing Committee.** In very brief summary, previous objectors have submitted that one woman had to give up her studio at Yorkshire Artspace due to harassment from "testosterone fuelled men"; women have been deterred from accessing amenities within the vicinity of Spearmint Rhino; women have been harassed outside the club; pimps have been observed hanging around outside the club; a woman was told by two men leaving the club that she was "good enough to rape" and so on.

3 EVIDENCE THAT SEVS REDUCE EQUALITY AND PROVIDE A CONDUCTIVE CONTEXT FOR VIOLENCE AGAINST WOMEN

³⁶ Op cit. p.87

³⁷ Ibid

³⁸ 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.

³⁹ Safe in the City? Girls tell it like it is. March 26, 2017 <https://theconversation.com/safe-in-the-city-girls-tell-it-like-it-is-72975>.

3.1 Violence against women and girls

3.1.1 HM Government reports that there were an estimated 1.35 million female victims of domestic abuse in 2014 and nearly 450,000 victims of sexual violence⁴⁰. It states

'Violence against women and girls is both a cause and consequence of gender inequality. We will continue to challenge the deep-rooted social norms, attitudes and behaviours that discriminate against and limit women and girls across all communities'⁴¹

3.1.2 The same report states under the heading *Night Time Economy*:

'While crime in the night time economy has been falling steadily during the past years, we know that 36% of victims of serious sexual assault reported that the offender was under the influence of alcohol [Focus on Violent Crime and Sexual Offences: 2013/14]. We will continue to encourage local areas to prevent violence against women and girls in the night time economy...'⁴²

3.1.3 A 2014 study of male undergraduates demonstrates how heavy drinking and sexual violence is mediated by the extent to which men engage in sexually objectifying women

'alcohol use intensifies the objectification of women in a manner that increases sexual violence risk'⁴³

3.1.4 On 5th March 2014 *The Independent* published findings of the Violence Against Women report by the *European Agency of Fundamental Rights* (FRA) highlighting how half of women in Britain admit they have been physically or sexually assaulted, higher than the 1 in 3 women from across Europe who will be a victim of violence in their lifetime.⁴⁴

3.1.5 2008 research shows how domestic violence perpetrators who access the sex industry (pornography and strip clubs) use more controlling behaviours than those who do not.⁴⁵ Coercively controlling behavior is the biggest risk factor for fatal domestic abuse and is now enshrined in legislation: Section 76 of the Serious Crime Act 2015 - Controlling or Coercive Behaviour in an Intimate or Family Relationship.⁴⁶ Furthermore, there is a wealth of practice-based evidence from the women's domestic abuse and sexual violence sector of women disclosing how their abusers access pornography, prostitution and strip clubs.

⁴⁰ HM Government, *Ending Violence against Women and Girls Strategy 2016 – 2020* Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAWG_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF

⁴¹ HM Government, *Ending Violence against Women and Girls Strategy 2016 – 2020* (p. 16) Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAWG_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF

⁴² Ibid

⁴³ Gervais, S. J., DiLillo, D., & McChargue, D. (2014) *Psychology of Violence Understanding the Link Between Men's Alcohol Use and Sexual Violence Perpetration: The Mediating Role of Sexual Objectification*.

⁴⁴ <http://www.independent.co.uk/news/uk/home-news/the-violence-epidemic-half-of-women-in-britain-admit-they-have-been-physically-or-sexually-assaulted-9169143.html>

⁴⁵ Simmons, C. A., Lehmann, P. & Collier-Tenison, C (2008) *Violence Against Women 14 Linking Male Use of the Sex Industry to Controlling Behaviors in Violent Relationships: An Exploratory Analysis*

⁴⁶ http://www.cps.gov.uk/legal/a_to_c/controlling_or_coercive_behaviour/#a01

3.1.6 On average, two women per week are murdered by a former or current partner in the UK.⁴⁷ Karen Ingala Smith who created the Femicide Census recording murders of women by men writes:

‘One of the most important things about the Femicide Census is that we look beyond intimate partner violence, to fatal violence from other male family members, from sons, from strangers, and including men who pay for sex. Doing this helps us see the bigger picture; identifying the commonalities across the different contexts of men’s violence against women can help us see its root causes. This is essential if we’re really serious about reducing men’s violence against women and girls. Continuing to improve policing and justice responses is vital, but these alone won’t bring about the reduction in men’s violence against women that we want, if we don’t change the attitudes and inequality that foster it.’⁴⁸

3.1.7 Furthermore, in the Femicide database of the 936 women killed by men between 2009 and 2015, Ingala Smith states:

‘it is known that at least 21 of the women killed had links to prostitution or pornography, and we think this will be an undercount. In my opinion, prostitution is financially compensated rape and prostitution and pornography are eroticised inequality. You can’t have one sex overwhelmingly sold as a commodity and the other the purchaser, without sex inequality and without reinforcing that inequality.’⁴⁹

3.1.8 On January 1st 2019, Ingala Smith recorded the 1000th woman killed whose name she has recorded since she started Counting Dead Women.⁵⁰ In September 2019, it was reported that domestic abuse killings have reached an all-time high.⁵¹

3.1.9 Further research indicates that films which present women in an “objectified and degrading way have the effect of altering the way men perceive the account of an acquaintance rape, lessening males’ perception of the victim’s suffering.” The study goes on to state that “Although previous research has indicated that violent pornography has this effect, our results suggest that violence or explicit sexual intercourse is not necessary to obtain these effects. Merely presenting images of women who are degraded or objectified can produce these results” (Milburn, Mather and Conrad 2000, pp. 659-660)⁵². These attitudes were less prevalent with regards to “stranger rape” which is the least common form of sexual violence⁵³. These attitudes not only impact on women and girls generally but will also be brought into play on juries in rape trials. In December 2018,

⁴⁷ Women’s Aid <https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/how-common-is-domestic-abuse/>

⁴⁸ Guardian 7th December 2016 *Why does a woman stay with a violent man? Sometimes, to save her life* <https://www.theguardian.com/commentisfree/2016/dec/07/femicide-census-violence-against-women>

⁴⁹ Ibid

⁵⁰ <https://kareningalasmith.com/2019/01/01/1000-dead-women/>

⁵¹ <https://www.independent.co.uk/news/uk/home-news/domestic-violence-abuse-murders-uk-statistics-five-years-cps-refuge-a9103811.html>

⁵² Milburn, M. A.; Mather, R.; Conrad, S. D. The effects of viewing R-rated movie scenes that objectify women on perceptions of date rape; *Sex Roles*; Nov 2000; 43, 9/10; Social Science Premium Collection

⁵³ Rape Crisis England and Wales: Myths vs Realities available from: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/myths-vs-realities/>

the End Violence Against Women Coalition (EVAW) published worrying results about the prevalence of victim blaming and rape myths in a survey it conducted of 4000 people across Britain.⁵⁴ Also see Dr Dominic Wilmott's research⁵⁵ into jury bias for further reading.

- 3.1.10 Whether or not they choose to be in sexually objectifying environments, women's exposure to sexually objectifying events or environments "is thought to directly cause distress and increase women's vulnerability to eating disorders, sexual dysfunction, anxiety and depression"—a recent study also found "strong evidence that exposure to objectifying events in daily life primes a state of self-objectification, making women more conscious of how their body appears to others...**just as breathing second-hand smoke is unhealthy for nonsmokers, we found that objectifying events need not be experienced first-hand** to induce the potentially harmful process of self-objectification. Witnessing sexual objectification of other women also reliably predicted ... increases in state self-objectification"⁵⁶ which in turn was related to lower positive emotions in everyday life.
- 3.1.11 The sexual objectification of women, as encouraged by and practised in SEVs, reinforces gender inequality⁵⁷.
- 3.1.12 When men are encouraged to hand over money to buy sexual gratification from women who would not choose to do these acts if they were not being paid, this dehumanises women and promotes the '**sexist view of sex**' discovered in the recent YouGov survey for the End Violence Against Women in August 2019⁵⁸.
- 3.1.13 Sexual objectification and sexual violence are consistently associated with each other (Gervais et al., 2014). Sexual objectification dehumanises women⁵⁹. Men who objectify women are also likely to sexually victimise women⁶⁰. "After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals." (Wright & Tokunaga 2016).
- 3.1.14 A recent study (Johnson et al. 2018) found that objectification of the other sex is associated with "**severe psychological aggression and physical assault perpetration**" in males, but not in females. This demonstrates that males and females react differently to objectification of the other sex.

⁵⁴ <https://www.endviolenceagainstwomen.org.uk/major-new-survey-many-still-unclear-what-rape-is/>

⁵⁵ Wilmott, D. 'There is a problem with juries acting on myths rather than evidence' in *The Psychologist* December 2018 Vol.31 (pp.16-19) available from: <https://thepsychologist.bps.org.uk/volume-31/december-2018/there-problem-juries-acting-myths-rather-evidence> (last accessed 29th October 2019)

⁵⁶ Koval et al. (2019)

⁵⁷ See for example the Home Office Sexualisation Review (Papadopoulos, 2010); Heflick & Goldenberg (2009); Heilman & Stopeck (1985); Nicolson (1996); Rudman & Borgida (1995) See also the section (below) on modern policy approaches – evidence-led legal and policy directives acknowledge this link.

⁵⁸ <https://www.endviolenceagainstwomen.org.uk/our-major-new-survey-reveals-sexist-views-on-sex/>

⁵⁹ Loughnan et al. (2010)

⁶⁰ Rudman & Mescher (2012)

- 3.1.15 Male domestic violence offenders using the sex industry use more forms of aggressive violence and more controlling behaviours than those who do not use the sex industry⁶¹. Men who are sex buyers are significantly more likely (15%) than non-sex buyers (2%) to report that they would force a woman to have sex, or rape a woman, if they could get away with it. They also report having engaged in three times more sexually aggressive behaviour than men who were not sex buyers⁶². Men classed as “misogynistic” because of their self-reported hostility and violence towards women and their endorsement of rigidly traditional notions of masculinity were far more likely than members of any other group (including ‘sex-focused’ men) to have paid for sexual services including stripping, peepshows and lapdances⁶³.
- 3.1.16 After being exposed to images that sexually objectify women, men are significantly more accepting of sexual harassment, interpersonal violence, rape myths, and sex role stereotypes – all of which act to reinforce gender inequality⁶⁴. Importantly, this increased acceptance of harmful attitudes is not confined to particular women but generalises to **women as a group**.
- 3.1.17 The Women and Equalities Committee Report of October 2018 on Sexual harassment of women and girls in public places discussed the licensing of sexual entertainment venues:

Licensing of sexual entertainment venues

135. When licensing lap-dancing clubs and other sexual entertainment venues (SEVs), local authorities can decide to have a policy on licensing SEVs, including on the number of venues to license. The policy needs to reflect the basis on which a license application can be refused. Policies on sexual entertainment venues have been the focus of activity in some local areas because, as Karon Monaghan QC told us, such venues “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.” Ms Monaghan continued: “How are we doing that in the 21st century? **We are not going to get rid of sexual violence if we mandate the sexual objectification of women in licensed venues.**”²²⁶ (emphasis added)

136. Some local areas already take account of women’s safety when deciding their cap on sexual entertainment venues (SEVs). Avon and Somerset Police and the Police and Crime Commissioner’s office support a policy of having no SEVs in Bristol to advance women’s equality. Martin Rowland, Bristol’s City Centre Neighbourhood Manager for Avon and Somerset Police expressed the view that the industry exemplifies men’s objectification and entitlement of women. **He told us that: “The licensing of sex entertainment venues, and in particular lap dancing clubs, sends a clear message that authorities support and license activities that encourage these anachronistic attitudes.**”²²⁷ (emphasis added)

137. Sheffield City Council has been subject to two legal challenges under the Public Sector Equality Duty by a group of local campaigners for failing to consider the impact on gender equality in the community when it licensed a branch of the Spearmint Rhino strip

⁶¹ Simmons et al. (2008)

⁶² Farley et al. (2015)

⁶³ Casey et al. (2016)

⁶⁴ See the review of the American Psychological Association (2007) and see also for example Allen, D’Alessio & Brezgel (1995); Lanis and Covell (1995); Zillman & Weaver (1989).

club and subsequently when it published a new policy on SEVs. The Council was forced to settle both cases on the basis that they had failed to comply with the PSED and is now consulting afresh on their policy. The case has potential ramifications for other local authorities who fail to consider these issues when licensing SEVs. Karon Monaghan QC told us: The power to take action lies in the hands of individuals. One can issue what is called judicial review proceedings in the High Court and say, 'My local authority has failed to have regard to the need to eliminate harassment when it licensed this club' or licensed a pub that is known to sexually harass customers, and so on.²²⁸ However, it should not be up to local campaigners to force local authorities to make decisions that properly take account of women's safety and gender equality. The licensing regime in Scotland requires local authorities who adopt the relevant legislation on SEVs to consider the impact specifically with regard to the objective of reducing violence against women when preparing an SEV policy statement. They are also required to consult appropriate bodies, such as women's organisations or experts in prevention of violence against women.²²⁹

- 3.1.18 In addition to the incompatibility of SEVs and the PSED, a number of specialist agencies whose agenda is to promote gender equality and end violence against women identify SEVs as harmful and wish to see a nil cap.
- 3.1.19 In a multinational study of male violence against women published in 2013 by the United Nations⁶⁵, the most common motivation of men who have admitted to rape is the **belief that they are entitled to sex** even without the female partner's consent. This study interviewed 10,000 men and 1 in 4 had raped their wife, their partner or another woman. That is not an insignificant minority of men. Entitlement, which is the stock in trade of lap dancing clubs, is the main motivation given by men who rape as professionals working with both survivors and perpetrators of sexual violence have told previous licensing panels. See, for example the case of a dancer leaving Bentley's strip club in Doncaster who was assaulted by a customer because she repeatedly refused his attempts to have sex with her.⁶⁶
- 3.1.20 The most commonly identified attitudinal risk factor for men's sexual and domestic violence and coercion against women globally stems from gender inequality - a belief in the dominance of men, and their needs or wishes and bodies, over women.⁶⁷
- 3.1.21 In a study for the *Journal of Sex Research* (Frank 2003)⁶⁸, more than half the men interviewed said they were motivated to visit lap dancing clubs to get away from what they saw as the rules for behaviour that constrained them - that is, **treating women equally** - for example when

⁶⁵ UN Women 10th September 2013 *Half of men report using violence and a quarter perpetrate rape according to UN survey of 10,000 men in Asia- survey* <http://www.unwomen.org/en/news/stories/2013/9/half-of-men-report-using-violence-and-a-quarter-perpetrate-rape-according-to-un-survey>

⁶⁶ <https://metro.co.uk/2017/04/23/strip-club-dancer-fractured-cheekbone-after-punch-from-client-that-pestered-her-for-sex-6592492/>

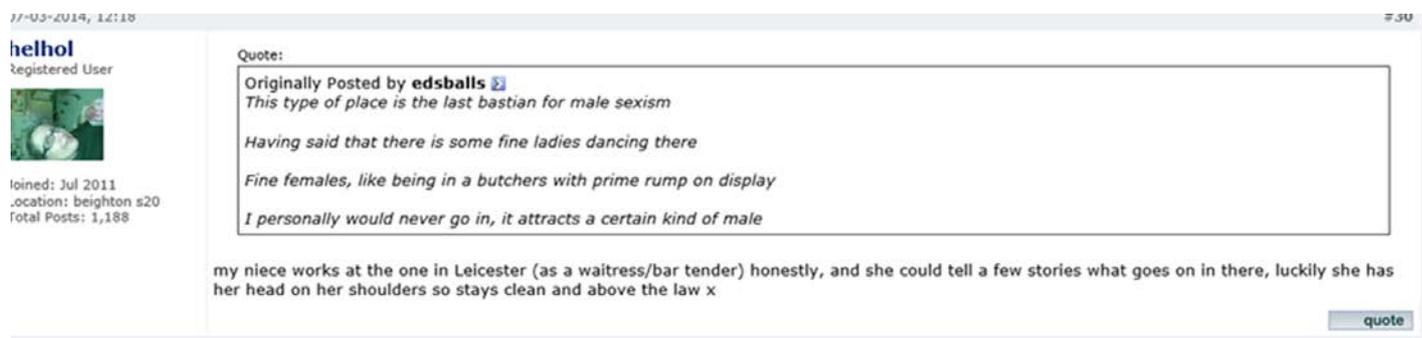
⁶⁷ Ricardo, C., Eads, M. & Barker, G. (2011). *Engaging Boys and Men in the Prevention of Sexual Violence*. Sexual Violence Research Initiative and Promundo. Pretoria, South Africa and Fulu, E., Warner, X., Miedema, S., Jewkes, R., Roselli, T. & Lang, J. (2013). *Why Do Some Men Use Violence Against Women and How Can We Prevent it. Quantitative Findings from the United Nations Multi-Country Study on Men and Violence in Asia and the Pacific*. Bangkok: United Nations Development Programme, United Nations Population Fund, United Nations Women and United Nations Volunteers.

⁶⁸ Frank, K. (2003) *Journal of Sex Research*, 40, 61-75 *Just Trying to Relax: Masculinity, Masculinizing Practices, and Strip Club Regulars*

interacting with female colleagues at work. That is not an insignificant minority of men. One participant said of visiting a lap dancing club:

‘You can go in there and shop for a **piece of meat**, quote unquote, so to speak. I mean, you want to see a **girl** run around naked, have her come over, pay her to do a dance or two or three and walk away and not even ask her name. Total distancing.’

3.1.22 Similarly, a post on Sheffield Forum about Spearmint Rhino stated⁶⁹:



helhol
Registered User

Quote:

Originally Posted by edsballs
This type of place is the last bastion for male sexism

Having said that there is some fine ladies dancing there

Fine females, like being in a butchers with prime rump on display

I personally would never go in, it attracts a certain kind of male

my niece works at the one in Leicester (as a waitress/bar tender) honestly, and she could tell a few stories what goes on in there, luckily she has her head on her shoulders so stays clean and above the law x

3.1.23 This is manifestly incompatible local authorities' gender equality duties.

3.1.24 A psychological research study published in 2014 which used male students as its study population concluded that the frequently documented association between heavy drinking and sexual violence is mediated by the extent to which men engage in sexually objectifying women. In other words, '**alcohol use intensifies the objectification of women in a manner that increases sexual violence risk**⁷⁰. SEVs provide alcohol and encourage sexual objectification. In fact, dancers actively encourage male customers to consume alcohol as testified by former dancers and indeed a Spearmint Rhino told one of the undercover investigators this in February 2019.

3.1.25 Sexual objectification is not equivalent to sexiness or sexuality or sexual enjoyment – sexual objectification is a barrier to the development and enjoyment of authentic mutually satisfying sexual relationships where women and men are equally valued and in charge of their own sexuality. We reiterate that:

- # The sexual objectification of women, as encouraged by and practised in SEVs, acts to reinforce gender inequality⁷¹.
- # Sexual objectification dehumanises women⁷².
- # Male domestic violence offenders using the sex industry use more forms of aggressive violence and more controlling behaviours than those who do not use the sex industry⁷³.

⁶⁹ <http://www.sheffieldforum.co.uk/showthread.php?t=1283563&highlight=spearmint+rhino&page=2>

⁷⁰ Gervais, S. J., DiLillo, D., & McChargue, D. (2014, January 13) Psychology of Violence *Understanding the Link Between Men's Alcohol Use and Sexual Violence Perpetration: The Mediating Role of Sexual Objectification*.

⁷¹ See for example the Home Office Sexualisation Review (Papadopoulos, 2010); Heflick & Goldenberg (2009); Heilman & Stopeck (1985); Nicolson (1996); Rudman & Borgida (1995).

⁷² Loughnan et al. (2010) Eur. J. Soc. Psychol. 40, 709–717

- # After being exposed to images that sexually objectify women, men are significantly more accepting of sexual harassment, interpersonal violence, rape myths and sex role stereotypes – all of which act to reinforce gender inequality⁷⁴. Importantly, this increased acceptance of harmful attitudes is not confined to particular women but generalises to women as a group.

3.1.26 Pornified and sexualized culture also impacts on girls' self-esteem, confidence and their value. As the GirlGuiding Girls' Attitudes Survey 2016 states:

'Girls are saying they can't do the things they'd like because they don't feel safe or because of double standards on what behaviours are acceptable or what roles are open to them compared with boys... From as young as seven, girls feel the impact of daily sexist images of women and girls in the media, online and all around them. Girls tell us that sexist objectification of women in the media makes them feel disempowered and that gender stereotypes make them feel that their gender will hold them back in life. They tell us they have to confront intense and unobtainable appearance pressures to be perfect and many say they feel they're not good enough... Overwhelmingly, girls want to live in a world without gender stereotypes, where women and girls aren't judged on how they look, where they are safe and where people are not discriminated against.' (p2)

3.1.27 It reported that 61% of girls aged 11-21 have experienced people criticising their bodies (p7), 70% of girls aged 11-21 say sexism is so widespread it affects most areas of their lives (p9), 21% of girls aged 17-21 experience street harassment and 44% change their behaviour to avoid this. (p14).⁷⁵

3.2 Modern policy approaches to preventing violence against women and girls

3.2.1 Evidence-based research has now resulted in recommendations that the most effective way to reduce the prevalence of men's violence against women is to refocus on **community-level prevention**: that is, to change the cultural conditions which are facilitating men's belief that they are entitled to harass, abuse and violate women. These cultural conditions underpin the behaviour of individual men.⁷⁶

Sheffield Domestic and Sexual Abuse Strategy 2018-2022 states under *Priority Two: ELIMINATING VIOLENCE AGAINST WOMEN AND GIRLS* paragraph 8.8

'We will:

⁷³ Simmons et al. (2008) *Violence Against Women* 14: 406

⁷⁴ See the review of the American Psychological Association (2007) and see also for example Allen, D'Alession & Brezgel (1995); Lanis and Covell (1995); Zillman & Weaver (1989).

⁷⁵ <https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girls-attitudes-survey-2016.pdf>

⁷⁶ Hester M., & Lilley, S.J. (2014) *Preventing violence against women: Article 12 of the Istanbul Convention*. Council of Europe, Strasbourg; Jewkes, R., Flood, M., & Lang, J. (2015). From work with men and boys to changes of social norms and reduction of inequities in gender relations: a conceptual shift in prevention of violence against women and girls. *The Lancet*, 385, (Issue 9977), 1580 – 1589; Fulu, E., Warner, X., Miedema, S., Jewkes, R., Roselli, T. & Lang, J. (2013). *Why Do Some Men Use Violence Against Women and How Can We Prevent it. Quantitative Findings from the United Nations Multi-Country Study on Men and Violence in Asia and the Pacific*. Bangkok: United Nations Development Programme, United Nations Population Fund, United Nations Women and United Nations Volunteers.

- Promote public service messages that challenge abusive behaviour by men and boys, and promote respect for women and girls' (p.15).⁷⁷

3.2.2 We argue that this cannot be achieved whilst upholding the notion that strip clubs are a legitimate form of "entertainment." It is worthy of note that the Council broadly supports a ban on using animals as entertainment but not women.⁷⁸

3.2.3 In 2017, the Sheffield Know the Line campaign was launched, with the backing of the Council.⁷⁹ By endorsing strip clubs and not having a nil cap enshrined in policy, the Council is giving very mixed messages with its sexual entertainment policy and consequent relicensing of the city's sole strip club whilst simultaneously backing such initiatives. Please note that Know the Line has objected to Spearmint Rhino's licence renewal every year since the campaign was established.

3.3 A culture of harm

3.3.1 SEVs promote harmful attitudes to women and run counter to promoting equality between women and men; we reiterate that these are not moral objections. SEVs reproduce and promote the prevailing financial and social inequality between women and men in our society, and they reproduce and promote the prevailing cultural assumption that women's bodies are objects to which men are entitled to have access. Citing examples of women accessing these clubs as customers, as has been done, as though this implies gender equality objectives are being achieved illustrates a clear lack of understanding of equality issues. Arguments about male strippers also fail to grasp that this does not mean that strip clubs are not sexist and furthermore, the troupe of male performers known as the "Chocolate Men" is predicated on racist stereotypes about black male sexual aggression and large penises; a trope which is a common feature of pornography.

3.3.2 There is evidence that women working in SEVs - and women encountering men who have been using SEVs - come to direct harm. Our argument is that in addition to the negative impacts on gender equality and individual women's fear of and experiences of male violence, SEVs are part of a wider culture of harm, which is addressed in Paragraph 1, Article 12 of the Istanbul Convention which Parliament voted to ratify and still pending ratification⁸⁰:

'Parties shall take the necessary measures to promote changes in the social and cultural patterns of behaviour of women and men with a view to eradicating prejudices, customs, traditions and all other practices which are based on the idea of the inferiority of women or on stereotyped roles for women and men'⁸¹

⁷⁷ <http://sheffielddact.org.uk/domestic-abuse/wp-content/uploads/sites/3/2013/05/Domestic-And-Sexual-Abuse-Strategy-2018-2022-FINAL.pdf>

⁷⁸ <http://sheffieldanimalaction.org/blog/sheffield-animal-action-presents-petition-sheffield-city-council-meeting/>

⁷⁹ <https://sheffielddact.org.uk/domestic-abuse/uncategorized/know-the-line-campaign-against-sexual-harassment-launches-in-sheffield/>

⁸⁰ Independent 16th December 2016 *Anti-domestic violence bill passes, despite anti-feminist MP's attempt to block it* <http://www.independent.co.uk/news/uk/politics/anti-domestic-violence-bill-istanbul-convention-passed-mps-women-vote-parliament-fgm-latest-a7479256.html>

⁸¹ <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168008482e>

which Hester and Lilley (2016 p.7) expand thus:

‘The purpose of Article 12 is to reach the hearts and minds of individuals to ensure changes in mind-sets, attitudes and beliefs towards women, their role and status in society, their sexuality, as well as women’s agency. The ultimate aim is to change the behaviour of men and women, boys and girls, that is currently all too often influenced by prejudice, gender stereotypes or gender-biased customs and traditions, and that helps to perpetrate or condone violence against women (Article 12, paragraphs 1 and 2).’⁸²

3.3.3 The British Council 2016 response to the UN Sustainable Development Goals (SDGs)⁸³ also recognises how:

‘Cultural platforms influence, shape and challenge the world through their stories, and stakeholders draw a clear link between stereotyped and sexist representations in dominant culture and the unfair treatment of women in society.’ (p.4)⁸⁴

3.3.4 This new focus on violence against women is beginning to be reflected in policy and legislation. In 2015, as part of the revision to Scottish licensing law, an amendment to legislation was passed and enacted (the Air Weapons and Licensing (Scotland) Act 2015) which in S76⁸⁵ formally recognises the relevance of SEVs to violence against women:

‘(3) In preparing a SEV policy statement, a local authority must—
(a) consider the impact of the licensing of sexual entertainment venues in their area, having regard, in particular, to how it will affect the objectives of—
(i) preventing public nuisance, crime and disorder,
(ii) securing public safety,
(iii) protecting children and young people from harm,
(iv) **reducing violence against women**, and
(b) consult such persons or bodies as they consider appropriate.’ (emphasis added)

3.3.5 At the Judicial review hearing regarding the revised 2016 sexual establishment policy, it submitted that:

‘There is no engagement with any wider impact of the presence of SEVs on gender equality, the elimination of discrimination, the advancement of equality of opportunity, or the fostering of good relations between the sexes, which are statutory equality aims. There is also no engagement with the evidence contained in the Zero Option response of the negative impacts of SEVs on women who work in them (and women more broadly).’ (claimant’s QC, Karon Monaghan)

3.4 Evidence of links between exposure to objectification of women and ‘real life’ behaviour

⁸² Preventing violence against women: Article 12 of the Istanbul Convention (2016) <https://edoc.coe.int/en/violence-against-women/7140-preventing-violence-against-women-article-12-of-the-istanbul-convention.html>

⁸³ <http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁸⁴ British Council research on gender equality and empowering women and girls in the UK: Meeting the challenge of the Sustainable Development Goals (SDGs): <https://www.britishcouncil.org/society/womens-and-girls-empowerment/gender-equality-uk>

⁸⁵ <http://www.legislation.gov.uk/asp/2015/10/section/76/enacted>

3.4.1 A 2016 research publication identified⁸⁶ refers to the links between men being exposed to the objectification of women, having ideas that women are objects, and having ideas that are supportive of violence towards women. It supports the evidence for behavioural scripts being influenced by ‘fantasy’ or otherwise ‘not quite real’ depictions of women/sex such as we find in SEVs. The review makes reference to a study by Bogaert and colleagues, looking at how men treated women after viewing objectifying pornography. This study found that “Exposure to rape myth congruent depictions increased the sexually suggestive behavior of lower IQ men only. It was theorized that more intelligent men are less likely to deem scripts from entertainment media as appropriate guides for real-life opposite sex interactions.” This may possibly help to explain why men in decision making positions who may be more intelligent than average may find it difficult to understand the impact of scripts from SEVs in the general population.⁸⁷ The 2016 review highlights how SEVs undermine women’s equality:

Thus, in objectifying media women’s role as a source of male sexual pleasure is emphasized and their humanity is deemphasized. After having internalized the messages of male sexual privilege and female dehumanization, it should be easier for men to envision imposing themselves sexually on women and reacting punitively to women who frustrate their sexual goals.⁸⁸

3.4.2 In a study conducted by the University of Kent and published in January 2017, it was found that “higher levels of objectification were significant predictors of aggression towards girls.”

And that:

‘Their findings are consistent with the claim that, among other negative outcomes, the perception of women as nothing but sexual objects also evokes aggression against them.’⁸⁹

4 ARGUMENTS IN FAVOUR OF STRIP CLUBS

- 4.1 The arguments most frequently used by those in favour of the industry are generally made by those with a vested interest in the status quo whereas objectors tend to object because of concerns about the impacts the industry has on everyone, particularly women.
- 4.2 One argument is that if strip clubs close then unregulated stripping will still take place. Current policy does what it can to protect the interests of performers. It is important to note that there is no evidence at all that stripping would “go underground” if councils did not renew SEV licences nor is there any evidence at all that ‘occasional’ (unlicensed) performances would increase in number - as if there were an inevitable fixed market for striptease. As was argued in the judicial review of 2018, research that was clearly relevant, particularly in circumstances in which a single

⁸⁶ Wright, P.J & Tokunaga, R.S (2016) Men’s Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women in *Archives of Sexual Behavior*

⁸⁷ Bristol Fawcett Society 2017

⁸⁸ Wright, PJ & Tokunaga op cit

⁸⁹ Vasquez, E., Pina, A. & Bell, C. (2017) ‘The sexual objectification of girls and aggression towards them in gang and non-gang affiliated youth.’ in *Psychology, Crime, and Law* <https://www.kent.ac.uk/news/society/12377/link-between-sexual-objectification-and-aggression> (last accessed 28th October 2019)

piece of contrary research (the Colosi research) was so heavily relied on was ignored and not made fully available to the Licensing Committee in its deliberations when considering the now quashed policy. We trust that this will not happen this time given that in the second judicial review against SCC in 2019, the court heard:

‘A tabulated overview of all consultation responses was also provided to the Committee as part of the Report. It is noted that none of the evidential content of the Zero Option responses (either to the first or second stage of the consultation process) was summarised in the appended table, and therefore none of the contrary academic evidence to that contained in the EIA’s “Supporting Information” section was before the Councillors when they took the Decision.’

- 4.3 The UK study undertaken in 2011 (Sanders & Hardy 2011)⁹⁰ found that the industry is fuelled by the supply of performers, not by a demand for performances. Therefore a business that recruits and trains performers and advertises their services, is fuelling demand. The act of giving a licence to allow this activity to take place is also an act that fuels demand. Further research supports the success of policy approaches that reduce demand for the trade in sex by acting on supply: levels of demand for the trade vary between countries, over time and according to the cultural and legal context. Here in the UK the number of men who pay for sex doubled during the 1990s along with the growth in numbers of SEVs, with the rate increasing from one in 20 men to nearly one in 10 men. If demand can grow, it can also shrink, as we have already highlighted in paragraphs 1.1 (bullet point 4) and 2.2. And that is exactly what countries like Sweden and Norway have shown through their adoption of the Sex Buyer Law, which criminalises the buyer only.
- 4.4 An investigation into the consequences of that law by the Swedish government found that street prostitution in Sweden halved during the period 1999-2008 and there is no evidence these women were simply displaced to indoor prostitution or prostitution advertised online. The number of men paying for sex in Sweden also declined. A Swedish survey in 1996 found 13.6% of men reported buying sex, while a similar survey in 2008 found this figure had dropped to 7.9%.
- 4.5 Research conducted by the Child and Woman Abuse Studies Unit at London Metropolitan University with 137 men who paid women for sex found ‘the accounts of men who had paid for sex overseas confirm that legality contributes to normalisation, which in turn increases the likelihood of paying for sex.’⁹¹ In the context of SEVs a local authority policy that permits the licensing of SEVs contributes to normalisation in the same way which directly contradicts the Council’s statement in the Policy that it wishes to work to combat the normalisation of the objectification of women.
- 4.6 A recent international review for the Scottish Government finds that restrictive legislation (action which communicates to men that they don’t have legal access to the sex trade) leads to decreased demand as well as a reduction in trafficking for sexual exploitation (Malloch et al.

⁹⁰ Sanders, T. & Hardy, K. (2011). The Regulatory Dance: Sexual Consumption in the Night Time Economy – Initial Findings. Leeds: University of Leeds.

⁹¹ From the website of End Demand: <http://enddemand.uk/about/frequently-asked-questions/>

2017)⁹². Further research supports the success of policy approaches that reduce demand for the trade in sex by acting on supply.

- 4.7 Legality contributes to normalisation which in turn increases the numbers of men who are customers in the sex trade – and men who are customers in the sex trade are significantly more willing to treat women unequally, to dehumanise women especially those who work in the sex trade, to be hostile towards women and to be violent towards women including their own partners. In the context of SEVs, a local authority policy that permits the licensing of SEVs contributes to normalisation in the same way.
- 4.8 Women performers being rendered unemployed is also another argument used to defend the industry, yet Spearmint Rhino’s own QC describes the performers as “peripatetic” stating “they will work in Sheffield one night and Wakefield another.”⁹³ Thus, the women have options to work in other clubs and many have spoken at hearings how the income they get from stripping supplements other incomes or they are students. Besides, employment or lack thereof, should not be a consideration for licensing decisions any more than it should be for all other licences granted/renewed/refused by Licensing. However, being unemployed is not synonymous with being unemployable as we are frequently told by those who support the strip trade whilst at the same time arguing that dancers are all competent, multi-skilled intelligent highly educated women.
- 4.9 Another argument presented against objectors is that we object on moral grounds and that it is us “shaming” the performers and one such performer accused objectors of “slut shaming” the dancers when speaking at the 2019 Spearmint Rhino renewal hearing. On the contrary, this is not a view held by objectors but research does show that women who work in the sex industry are stigmatised – not so much by the ‘general public’ – but by the men who use the sex industry. Farley et al. (2015)⁹⁴ found that men who were sex-buyers had less empathy for the women who sell sex, viewing them as intrinsically different from other women (inferior and less human than other women), compared to men who were not sex-buyers.
- 4.10 Objectors/campaigners are also wrongfully accused of “trolling” dancers on social media when in actual fact, most have ceased to engage with dancers as it was clearly counter-productive, for example, we were being accused of blaming strippers for domestic abuse and terrorism, whereas in actual fact a Twitter thread evolved organically to highlight the links between the objectification of women and perpetrating domestic abuse, drawing attention to a new study on the links between terrorists who have a background in perpetrating domestic abuse.⁹⁵ Despite initially engaging in a heated exchange of views and deciding to completely disengage, this has not

⁹² Malloch, M., Robertson, L., & Forbes, E. (2017). Evidence Assessment of the Impacts of the Criminalisation of the Purchase of Sex: A Review. Edinburgh: Scottish Government and Scottish Centre for Crime and Justice Research. ISBN: 978-1-78652-640-3. Available From:

<https://beta.gov.scot/binaries/content/documents/govscot/publications/research-publication/2017/02/evidence-assessment-impacts-criminalisation-purchase-sex-review/documents/00514185-pdf/00514185-pdf/govscot:document/>

⁹³ Spearmint Rhino hearing 2017

⁹⁴ Farley, M., Golding, J.M., Schuckman Matthews, E., Malamuth, N.M. & Jarrett, L. (2015). Comparing sex buyers with men who do not buy sex: New data on prostitution and trafficking. *Journal of Interpersonal Violence* 32(23), 1-25.

⁹⁵ <https://www.telegraph.co.uk/women/life/start-link-terrorism-domestic-violence-might-just-stop-next/>

stopped some dancers from repeatedly tagging campaigners alongside misrepresenting objectors with accusations of lying etc.

- 4.11 Another claim made by those who support the strip industry is that Spearmint Rhino benefits the local economy. We have yet to see any evidence of this given that we are unaware that any analysis of what Spearmint Rhino and its customers contribute to the local economy. Given the paucity of customers on the nights visited by the independent investigators, it is difficult to have faith in this assertion. Furthermore, as the coalition response to the Council's summary report of the investigation into breaches highlighted:

'Publicly available information about the accounts filed by Spearmint Rhino Ventures UK Ltd (the parent company for the Sheffield branch of SR and other branches including those in Birmingham and Bournemouth), of which the applicant John Specht has been one of the main directors since 2012 (as well as being director of each of the subsidiaries), also calls into question this portrayal of a highly effective manager and businessman; see <https://beta.companieshouse.gov.uk/company/03914051/filing-history>. We are not experts in accounts but just on a simple view it appears that over the period 2010 – 2017 the Spearmint Rhino UK chain has made an overall loss of over £4.9 million, with only two years in this time when it showed a profit: in 2017, £106K and 2013, £305K. (Indeed, it remains to be seen whether the profit reported in the 2017 accounts, filed on 12 July 2018, will remain in place: there have been several years, including 2014 and 2015, when the accounts initially filed by the company have shown a profit (albeit only £32K in 2014, and in 2015 only with an injection of £600K from John Gray, the head of Spearmint Rhino Worldwide) but in the following year's accounts revised figures have been given showing losses once again of hundreds of thousands of pounds. The accounts for 2018 have not yet been filed, although it is nearly 2 months after the date when accounts were filed last year, so this cannot be checked, nor can the 2018 accounts be considered). The rest of the time the group has lost huge amounts of money (up to £2.13million in a single year) and has been reliant upon capital injections from shareholders to continue to trade. Due to the very modest profits the company appears to have paid a correspondingly minimal amount of tax when it does turn a profit - an average of £19,000 per club in 2017. It also has a huge negative balance sheet, with net liabilities ranging from £1.57million to £2.61million over the period of the applicant's directorship. The company has also repeatedly had multi-million pound outstanding liabilities to HM Revenue and Customs and has needed to negotiate Time to Pay agreements for these.'⁹⁶

5 LEGAL MATTERS

5.1 Background

- 5.1.1 Guidance issued by the Home Office states that the purpose of the SEV legislation is "**to give local people a greater say over the number and location of lap dancing clubs in their area**". The importance of allowing public bodies to make honest, reasonable and sound decisions has been reflected in the licensing costs cases of City of Bradford Metropolitan District Council v Booth [2000] LLR 151 and Perinpanathan v City of Westminster Magistrates [2008] CO/2547/2008. While the possibility of a judicial challenge may be a cause for concern, these cases emphasise that if the authority acts in an honest, reasonable and proper manner then the

⁹⁶ [Coalition] Joint Response to SCC Report into Alleged Breaches of Licence Conditions at Spearmint Rhino Sheffield, August 2019 pp 11-12

decision is considered prima facie by a reviewing court to be the one to which they should hold unless there are other good reasons for this not to be the case, such as some impropriety.

5.1.2 In 2014 Ranjit Bhose QC, Philip Kolvin QC and Josef Cannon reviewed two recent judgements (R (Bean Leisure Trading A Limited) v Leeds City Council and R (Ruby May (1) Ltd) v Leeds City Council) for the Local Government Lawyer website in which they concluded:

‘In two recent decisions the courts have affirmed the wide powers enjoyed by licensing authorities to refuse renewals of licences for lap dancing clubs’

5.1.3 They also note that:

‘licensing authorities are entitled to ‘have a fresh look’ at an application for renewal of an SEV licence, and may refuse to renew even when there is no material change in circumstance.’⁹⁷

5.1.4 Guidance by human rights law expert Dr James Harrison, Director of the Centre for Human Rights in Practice at the University of Warwick, confirms that refusal to renew is not a breach of human rights law.⁹⁸

5.1.5 In the case of London Borough of Wandsworth ex parte Darker Enterprises Limited, R V [1999] WEHC Admin 34 para 46, Mr Justice Turner stated

‘It is, in my judgment, an inescapable fact that the Act of 1982 expressly contemplates the possibility that the circumstances in which a licence had been granted or renewed might change; hence the provisions of paragraph 12 of the 3rd Schedule, which apply not just in respect of the grant but, more importantly, also on the renewal of a licence. Thus the proposition that an existing licence holder can expect that he will be granted a licence in perpetuity for any given set of premises is plainly wrong’.

5.1.6 The Home Office Guidance refers to the question of the number of establishments and states quite bluntly that “**Nil may be the appropriate number**”. The guidance goes on to state, “Therefore, it is reasonable and potentially useful to future applicants, for a local authority to decide in advance of receiving any applications that certain areas are, or are not, appropriate locations for a sex establishment or a particular number of sex establishments”.

5.1.7 Judicial decisions have recognised the legitimacy of passing a ‘nil’ resolution in certain areas: Lord Neuberger of Abbotsbury stated in Belfast City Council v Miss Behavin’ Ltd [2007] UKHL 19: “The reason put forward by the committee, as adopted by the council, for the nil determination for the Gresham Street locality, namely the proximity of certain public buildings and shops of particular attraction to children, and of places of worship, appears to me to represent a rational ground for making and adhering to a nil determination: indeed it is just the sort of assessment that a local authority is best able to judge”.

5.1.8 On the question of the extent of a ‘relevant locality’, there is no obligation to set clearly-defined boundaries, although this may of course be helpful to both potential applicants and objectors. R v

⁹⁷ http://www.localgovernmentlawyer.co.uk/index.php?option=com_content&view=article&id=17968%3Alap-dance-no-more&catid=49%3Acomment-a-analysis-articles&Itemid=1

⁹⁸ <https://coventrywomensvoices.wordpress.com/2011/09/23/sex-entertainment-venues-and-the-human-rights-act/>

Peterborough City Council ex parte Quietlynn 85 LGR 249 sets the presumption that a locality cannot be an entire town, city or local authority area. This decision does not however mean that a 'nil' resolution cannot be adopted for a town, city or other area providing that the assessment of the constituent parts indicates that a nil resolution is appropriate for each of them. This is an approach that has been taken by a number of other licensing authorities.

5.1.9 We believe that the following authorities have taken a 'nil' approach:

Nil cap: London (a different regime) – Bromley Town; City of London; Enfield; Haringey; Harrow; Hounslow; Richmond; Havering⁹⁹; Camden¹⁰⁰

Nil cap but with grandfather rights: - Newcastle¹⁰¹; Coventry¹⁰²

Nil cap: North Tyneside (all 8 SEVs to close¹⁰³); Swansea¹⁰⁴; Winchester¹⁰⁵; Exeter¹⁰⁶; Warwick¹⁰⁷; Southend¹⁰⁸

5.1.10 It appears that the London Borough of Ealing is working towards a zero option.¹⁰⁹

5.1.11 The text *Sex Licensing* by Philip Kolvin QC states (p. 129, para 15.15) "One option for policy is to state that the appropriate number in a particular locality is zero and that the policy is intended to be strictly applied, except in genuinely exceptional circumstances. The policy ought to justify such a course, for example by reference to the status of the locality as a ...residential area... Of course, an authority may not reject an application without considering it, even where it breaches a zero policy." Mr Kolvin also states (p127, paras 15.10 and 15.11): "Lord Reid had said that an authority may evolve a policy so precise that it could well be called a rule; and there could be no objection to that provided that the authority was always willing to listen to anyone with something new to say. ... In other words, there is no rule against closed policies - the rule is against closed minds." Mr Kolvin also states (p7, para 2.5) that "**Parliament wrote into the legislation express provision for an authority to determine that nil is an appropriate number for sex establishments in a particular locality, and that from such decisions there should be no appeal**".

5.1.12 We have observed that a number of local authorities have designed appropriate forms of wording for their nil cap policy and provide three examples below.

Swansea: "While each application will be dealt with on its own merits, this policy gives prospective applicants an early indication as to whether their application is likely to be granted or not and creates a presumption that that any application for a sex establishment outside of the city centre area and any application for a sex entertainment venue in the

⁹⁹ <https://www.havering.gov.uk/Pages/News/A-new-licensing-system-to-ban-unlicensed-sex-establishments-in-the-Borough.aspx>

¹⁰⁰ www.camden.gov.uk%2Fccm%2Fcms-service%2Fdownload%2Fasset%3Fasset_id%3D2642539&usg=AFQjCNH5B48mhpCQgEVZil4c2O7DsYFBSw&sig2=OtilefOV83EEsY8gEYv4aA

¹⁰¹ https://www.newcastle.gov.uk/sites/default/files/wwwfileroot/business/licences/sev_policy_4_4_12.pdf

¹⁰² http://www.coventry.gov.uk/downloads/file/8505/sexual_entertainment_venue_policy

¹⁰³ http://www.northtyneside.gov.uk/browse-display.shtml?p_ID=521816&p_subjectCategory=

¹⁰⁴ <http://www.bbc.co.uk/news/uk-wales-south-west-wales-20178698>

¹⁰⁵ <http://www.winchester.gov.uk/licensing/sex-establishment-licence/>

¹⁰⁶ <https://exeter.gov.uk/media/1423/sex-establishment-policy-aug-2015.pdf>

¹⁰⁷ https://www.warwickdc.gov.uk/download/downloads/id/171/sex_establishment_licensing_policy

¹⁰⁸ https://www.southend.gov.uk/downloads/file/396/sex_establishment_policy

¹⁰⁹ <https://www.standard.co.uk/news/london/ealing-council-seeks-ban-on-strip-clubs-as-last-venue-closes-a4234246.html>

city centre area will normally be refused. It also provides prospective applicants with details of what is expected of them should an application be made.”

Coventry (NB seems to contradict itself later by making an exception for an existing SEV): “The Council has conducted a widespread public consultation on a proposed nil policy for the city. The majority of respondents agreed that there is no locality in Coventry of which it can be said that SEVs are appropriate. These considerations, among others set out in the policy, have led the Council to the clear opinion that there are no localities in Coventry in which it is appropriate to license a Sexual Entertainment Venue. This does not prevent individuals from applying for a Sexual Entertainment Venue Licence and each application being considered on its merits by the Licensing & Regulatory Committee.”

Winchester: “The Council's vision is to achieve balanced, sustainable communities and neighbourhoods to enable a good quality of life for all. In consultation with its partners it has developed and adopted a number of strategies, policies and plans that set out how we mean to achieve this vision and it is the Council's view that the granting of sex establishment licences would undermine the said vision.”

5.2 PUBLIC SECTOR EQUALITY DUTY

5.2.1 The Council is asked to be mindful of the fact that it has lost two judicial reviews. In the 2018 judicial review, the Council's attention was drawn to Aikens LJ, giving the judgment of the Divisional Court, in *R (Brown) v Secretary of State for Work and Pensions* [2008] EWHC 3158 (Admin), [2009] PTSR 1506, as follows:

i) The public authority decision maker must be aware of the duty to have “due regard” to the relevant matters;

ii) The duty must be fulfilled before and at the time when a particular policy is being considered;

iii) The duty must be “exercised in substance, with rigour, and with an open mind”. It is not a question of “ticking boxes”; while there is no duty to make express reference to the regard paid to the relevant duty, reference to it and to the relevant criteria reduces the scope for argument;

iv) The duty is non-delegable; and

v) Is a continuing one.

vi) It is good practice for a decision maker to keep records demonstrating consideration of the duty.

5.2.2 The Council is also asked to note that in cases where the decision may affect large numbers of vulnerable people, many of whom fall within one or more of the protected groups, the due regard necessary is very high: *R (Hajrula) v London Councils* [2011] EWHC 448 (Admin) at §69. This requires gathering the necessary information to conduct a rigorous analysis, including evidence based information about specific impact on those with protected characteristics: *R (JM) v Isle of Wight Council* [2011] EWHC 2911 (Admin) at §122 and *R (W) v Birmingham City Council* [2011] EWHC 1147 (Admin) at §176.

6 ADDITIONAL CONSIDERATIONS

- 6.1 As discussed, it is important to note that there is no evidence at all that the activity currently licensed in SEVs (i.e. not prostitution but nude sexual performance) would 'go underground' if councils did not renew or award licenses to SEVs or that 'occasional' (unlicensed) performances would increase in number as though there were an inevitable fixed market for striptease. The Council is asked to note strip clubs (along with the purchase of sex and hardcore pornography) were banned in Iceland in 2010 and the country has long been deemed the best place in the world to be a woman. For the past nine years, Iceland has topped the World Economic Forum's [gender equality index](#); the UK comes in at 15th¹¹⁰ whereas we ranked 9th in 2006 so are performing worse than we were just over 10 years ago.
- 6.2 It is also reported that in both Canada¹¹¹ and the United States of America¹¹² that strip clubs are "dying out" which appears to be a developing trend here in the United Kingdom¹¹³ with a decrease in popularity among its key audience (see bullet point 4 at paragraph 1.1). In a survey on "stag dos" conducted by The Big Domain in 2018, it was reported that "65% said they hated the objectification of women at stag parties and feared pictures and videos could damage relationships and careers."¹¹⁴ Furthermore, According to the BBC, the number of lap dancing clubs has fallen by a third in Englandⁱ. The same report states that "a survey conducted by YouGov in 2015 found that 64% of people in Great Britain said strip clubs were a negative part of British culture."¹¹⁵

7 OTHER LICENSING ASPECTS

- 7.1 Local authorities should also adhere to Section 141 of the Licensing Act 2003¹¹⁶ makes it an offence to sell or attempt to sell alcohol to a person who is drunk, or to allow alcohol to be sold to such a person on relevant premises. In light of the recent case of Gil David who it is reported claimed that Spearmint Rhino had "exploited" his drunkenness and stated 'I wasn't in control of my faculties and didn't realise what I was spending.' He added 'I was coerced into spending a third of my salary in five hours.'¹¹⁷

¹¹⁰ <https://www.theguardian.com/commentisfree/2018/jan/05/iceland-female-women-equal-pay-gender-equality>

¹¹¹ <https://www.narcity.com/news/strip-clubs-are-shutting-down-all-across-canada-and-heres-why>

¹¹² Is the American strip club dying out? 5th July 2019 available from: <https://www.bbc.co.uk/news/world-us-canada-48667681>

¹¹³ Sex shops and lap dancing clubs in England fall by third, 23rd February 2018 available from: <https://www.bbc.co.uk/news/uk-england-43043842>

¹¹⁴ 'Farewell to the stag do? Bachelor parties are dying out as grooms fear drunken antics will be shared online' Daily Mirror 26th May 2018. Available from: <https://www.mirror.co.uk/news/uk-news/farewell-stag-do-bachelor-parties-12601761>

¹¹⁵ 'Sex shops and lap dancing clubs in England fall by third' 23rd February 2018. Available from: <http://www.bbc.co.uk/news/uk-england-43043842>

¹¹⁶ [http://www.cps.gov.uk/legal/l to o/licensing of alcohol/#introduction](http://www.cps.gov.uk/legal/l%20to%20o/licensing%20of%20alcohol/#introduction)

¹¹⁷ <http://www.bbc.co.uk/news/uk-northern-ireland-30013478>

8 IN CONCLUSION

- 8.1 We believe that the presence of SEVs undermines gender equality in creating unsafe spaces and a hostile environment for all women.
- 8.2 Whilst there has been a steady mainstreaming legitimising the normalisation of the sexualisation and objectification of women, we are also experiencing a cultural shift with many in society rejecting these values as illustrated by recent successes in the *No More Page Three*¹¹⁸, *Lose the Lad Mags*,¹¹⁹ *Banknote*¹²⁰ #Timesup¹²¹ and #Metoo¹²² campaigns.
- 8.3 We reiterate that a 2016 report published by the Fawcett Society states:
- ‘There is a strong bedrock of support for equality between men and women – in 2016 it’s time to speed up the pace of change and ensure we aren’t waiting another 150 years to achieve it.’(p. 2)¹²³
- 8.4 We urge Sheffield Council to take on board the growing body of research evidence about the harmful impact of SEVs, to listen to the growing numbers of women’s voices who have left the industry and to be part of this change and thereby fully aligning with the City’s *Domestic and Sexual Abuse Strategy*.

¹¹⁸ https://en.wikipedia.org/wiki/No_More_Page_3

¹¹⁹ <https://www.theguardian.com/media/2015/nov/17/fhm-zoo-magazines-suspend-publication>

¹²⁰ <https://www.channel4.com/news/jane-austen-banknote-money-bank-of-england-carney>

¹²¹ <https://timesupnow.org/>

¹²² https://en.wikipedia.org/wiki/Me_Too_movement

¹²³ <http://www.fawcettsociety.org.uk/wp-content/uploads/2016/01/Sex-equality-state-of-the-nation-230116.pdf>

REFERENCES

- Allen, M., D'Alessio, D., & Brezgel, K. (1995). 'A Meta-Analysis Summarizing the Effects of Pornography II. Aggression After Exposure.' *Human Communication Research*, 22, 258–283.
- American Psychological Association, Task Force on the Sexualization of Girls (2007). 'Report of the APA Task Force on the Sexualization of Girls.' Washington,DC: American Psychological Association. Retrieved from www.apa.org/pi/wpo/sexualization.html
- Banyard, K. (2011). 'The Equality Illusion: The Truth about Women and Men Today.' London: Faber and Faber.
- Banyard, K (2016). 'Pimp State'. London: Faber and Faber.
- Baraket, O. & Shnabel, N. (2019) 'Domination and Objectification: Men's Motivation for Dominance Over Women Affects Their Tendency to Sexually Objectify Women' in *Psychology of Women Quarterly* September 2019 DOI: 10.1177/0361684319871913
- Barton, B. (2002). 'Dancing on the Mobius Strip: Challenging the Sex War Paradigm.' *Gender & Society*, 16(5) 585-602.
- Bernard, P., Gervais, S.J., Allen, J., Campomizzi, S. and Klein, O. (2012) 'Integrating Sexual Objectification With Object Versus Person Recognition: The Sexualized-Body-Inversion Hypothesis.' *Psychological Science* 23: 469–471
- Briggs, D. & Ellis, A. (2016) 'The Last Night of Freedom: Consumerism, Deviance and the Stag Party.' *Deviant Behavior*
- Carr, E.R., & Szymanski, D.M. (2011) 'Sexual Objectification and Substance Abuse in Young Adult Women.' *The Counseling Psychologist*, 39: 39.
- Casey, E.A., Masters, N.T., Beadnell, B., Wells, E.A., Morrison, D.M. & Hoppe, M.J. (2016). 'A Latent Class Analysis of Heterosexual Young Men's Masculinities.' *Archives of sexual behavior*, 45(5), 1039-1050. DOI 10.1007/s10508-015-0616-z
- Decker, M.R., Nail, J.E., Lim, S., Footer, K., Davis, W. & Sherman, S.G. (2017). 'Client and Partner Violence Among Urban Female Exotic Dancers and Intentions for Seeking Support and Justice'. *Journal of Urban Health*, 94(5), 637-647. <https://europepmc.org/articles/pmc5610130>
- Deshotels, T. H., & Forsyth, C. J. (2008). 'Sex rules: The edicts of income in exotic dancing.' *Deviant Behavior*, 29(5), 484–500.
- European Commission (2010). 'Violence against women and the role of gender equality, social inclusion and health strategies.' Synthesis Report of Expert Group on Gender Equality and Social Inclusion, Health and Long-Term Care Issues (EGGSI) Luxembourg: Publications Office of the European Union.
- Farley, M., Golding, J.M., Schuckman Matthews, E., Malamuth, N.M. & Jarrett, L. (2015). 'Comparing

sex buyers with men who do not buy sex: New data on prostitution and trafficking.' *Journal of Interpersonal Violence* 32(23), 1-25.

Forsyth, C. J., & Deshotels, T. H. (1997). 'The occupational milieu of the nude dancer'. *Deviant Behavior*, 18(2), 125–142.

FRA (European Union Agency for Fundamental Rights) (2014). *Violence Against Women: an EU-Wide Survey.* Luxembourg: FRA. ISBN: 978-92-9239-342-7.

<https://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report>

Frank, K. (2003). 'Just Trying to Relax: Masculinity, Masculinizing Practices, and Strip Club Regulars.' *Journal of Sex Research*, 40, 61-75.

Frank, K. (2005). 'Exploring the motivations and fantasies of strip club customers in relation to legal regulations.' *Archives of Sexual Behavior*, 34(5), 487-504

Fredrickson, B., & Roberts, T.A. (1997). 'Objectification theory: Toward understanding women's lived experiences and mental health risks.' *Psychology of Women Quarterly*, 21, 173–206.

Frenken, M.F.A. & Sifaneck, S.J. (1998) 'Sex workers and dope: an ethnography of heroin using lap-dancers in New York City.' *Addiction Research*, 6 (4): 341-370.

Fulu, E., Warner, X., Miedema, S., Jewkes, R., Roselli, T. & Lang, J. (2013). 'Why Do Some Men Use Violence Against Women and How Can We Prevent it. Quantitative Findings from the United Nations Multi-Country Study on Men and Violence in Asia and the Pacific.' Bangkok: United Nations Development Programme, United Nations Population Fund, United Nations Women and United Nations Volunteers.

Gervais, S. J., DiLillo, D., & McChargue, D. (2014). 'Understanding the Link Between Men's Alcohol Use and Sexual Violence Perpetration: The Mediating Role of Sexual Objectification.' *Psychology of Violence* 3(4), 1-14. doi: 10.1037/a0033840

Heflick, N.A. & Goldenberg, J.L. (2009). 'Objectifying Sarah Palin: Evidence that objectification of women causes women to be perceived as less competent and less fully human.' *Journal of Experimental Social Psychology*, 45, 598-601.

Heilman, B., Barker, J. & Harrison, A. (2017). 'The Man Box: A Study on Being a Young Man in the US, UK and Mexico.' Washington, DC and London: Promundo-US and Unilever.

<https://promundoglobal.org/wp-content/uploads/2017/03/TheManBox-Full-EN-Final-29.03.2017-POSTPRINT.v3-web.pdf>

Heflick, N.A., Goldenberg, J.L., Cooper, D.P. & Puvia, E. (2011). 'From women to objects: Appearance focus, target gender, and perceptions of warmth, morality and competence.' *Journal of Experimental Social Psychology*, 47, 572-581.

Hester M., & Lilley, S.J. (2014) 'Preventing violence against women: Article 12 of the Istanbul Convention.' Council of Europe, Strasbourg.

Holland, E., Roberts, T-A., & Haslam, N. (2019). 'How does it feel to be treated like an object? Direct and indirect effects of exposure to sexual objectification on women's emotions in daily life.' *Journal of*

Personality and Social Psychology: Attitudes and Social Cognition, 116(6), 885-898.

Holsopple, K (1998). 'Stripclubs According to Strippers: Exposing Workplace Sexual Violence.' Available online at <http://www.uri.edu/artsci/wms/hughes/stripc1.htm>

Hayashi Danns, J., & Leveque, S. (2011). 'Stripped: the Bare Reality of Lapdancing'. London: Clairview Books.

Jewkes, R., Flood, M., & Lang, J. (2015). 'From work with men and boys to changes of social norms and reduction of inequities in gender relations: a conceptual shift in prevention of violence against women and girls.' *The Lancet*, 385, (Issue 9977), 1580 – 1589.

Koval, K., Holland, E., Zyphur, M.J., Stratemeyer, M., Makovec Knight, J., Bailen, N.H., Thompson, R.J., Holland, E., Roberts, T-A., & Haslam, N. (2019). 'How does it feel to be treated like an object? Direct and indirect effects of exposure to sexual objectification on women's emotions in daily life.' *Journal of Personality and Social Psychology: Attitudes and Social Cognition*, 116(6), 885-898.

Johnson, M.R., Langille, I., & Walsh, Z. (2018). 'The Role of Objectification in the Victimization and Perpetration of Intimate Partner Violence. *Violence and Victims*.' 33(1), 23-39.
<http://connect.springerpub.com/content/sgrvv/33/1/23>

Lanis, K., & Covell, K. (1995). 'Images of women in advertisements: Effects on attitudes related to sexual aggression.' *Sex Roles*, 32, 639–649.

Lewis, J. (1998). 'Lap dancing: Personal and Legal Implications for Exotic Dancers.' In Elias, J.A., Bullough, V.L., Elias, V., & Brewer, G (eds.) *Prostitution: On Whores, Hustlers, and Johns*. Amherst, NY: Prometheus Books.

Loughnan, S., Haslam, N., Murmane, T., Vaes, J., Reynolds, C., & Suitner, C. (2010). 'Objectification leads to depersonalization: The denial of mind and moral concern to objectified others.' *European Journal of Social Psychology*, 40, 709-717.

Maass, A., Cadinu, M., & Galdi, S. (2013). 'Sexual harassment: Motivations and consequences.' In M.K. Ryan and N.R. Branscombe (eds.), *The Sage Handbook of Gender and Psychology*, Thousand Oaks, CA: Sage (pp. 341-358). <http://xyonline.net/sites/xyonline.net/files/2018-03/Maass%2C%20Sexual%20harassment.pdf>

Malloch, M., Robertson, L., & Forbes, E. (2017). 'Evidence Assessment of the Impacts of the Criminalisation of the Purchase of Sex: A Review.' Edinburgh: Scottish Government and Scottish Centre for Crime and Justice Research. ISBN: 978-1-78652-640-3. Available From:
<https://beta.gov.scot/binaries/content/documents/govscot/publications/research-publication/2017/02/evidence-assessment-impacts-criminalisation-purchase-sex-review/documents/00514185-pdf/00514185-pdf/govscot:document/>

McCord, E.S. & Tewksbury, R. (2012). 'Does the presence of sexually oriented businesses relate to increased levels of crime? An examination using spatial analysis.' *Crime and Delinquency*, XX(X), 1-18. DOI: 10.1177/0011128712465933. Available from:
<http://secondaryeffectsresearch.com/files/McCord%20and%20Tewksbury,%202013.pdf>

Milburn, M.A.; Mather, R.; Conrad, S.D. (2000) 'Sex Roles The effects of viewing R-rated movie scenes that objectify women on perceptions of date rape.' *Social Science Premium Collection* 43 (9/10).

Mount, L. (2018). 'Behind the Curtain": Strip Clubs and the Management of Competition for Tips.' *Journal of Contemporary Ethnography*, 47(1), 60-87.

Nicolson, P. (1996). 'Sexuality, power and organisation.' In *Gender, Power and Organisation: a Psychological Perspective*. London: Routledge.

Object: 'Stripping the Illusion – lapdancing testimonies.' <http://www.object.org.uk/lapdancing-testimonies>

Papadopoulos, L. (2010). 'Sexualisation of Young People: Review.' London: Home Office.

Pasko, L (2002) Naked Power: The Practice of Stripping as a Confidence Game. *Sexualities*, 5(1): 49-66.

Patiniotis, J., & Standing, K. (2012). 'License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres.' *Criminal Justice Matters*, 88:1, 10-12, DOI: 10.1080/09627251.2012.695498 <http://dx.doi.org/10.1080/09627251.2012.695498>

Ricardo, C., Eads, M. & Barker, G. (2011). 'Engaging Boys and Men in the Prevention of Sexual Violence.' *Sexual Violence Research Initiative and Promundo*. Pretoria, South Africa.

Roberts, R. et al. (2007). 'Sex Work and Students: An Exploratory Study.' *Journal of Further and Higher Education*, 31(4), 323 — 334

Rudman, L. A., & Borgida, E. (1995). 'The afterglow of construct accessibility: The behavioral consequences of priming men to view women as sex objects.' *Journal of Experimental Social Psychology*, 31, 493–517.

Rudman, L. A., & Mescher, K. (2012). 'Of animals and objects: Men's implicit dehumanization of women and likelihood of sexual aggression.' *Personality and Social Psychology Bulletin*, 38, 734– 746. doi: 10.1177/0146167212436401.

Sanders, T., & Campbell, R. (2012). 'The Regulatory Dance: Sexual Consumption in the Night Time Economy – Briefing for Licensing Practitioners.' University of Leeds.

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

Sherman, S.G., Brantley, M.R., Zelaya, C., Duong, Q., Taylor, R.B. & Ellen, J.M. (2017). 'The development of an HIV risk environment scale of exotic dance clubs.' *Aids And Behavior*, 21(7), 2147-2155.

Simmons, C.A. et al. (2008). 'Linking Male Use of the Sex Industry to Controlling Behaviors in Violent Relationships: An Exploratory Analysis.' *Violence Against Women* 14: 406.

Swedish Government (SOU) (2010). 'Prohibition of the Purchase of Sexual Services. An evaluation

1999-2008.' English translation, available from

<https://www.government.se/4a4908/contentassets/8f0c2ccaa84e455f8bd2b7e9c557ff3e/english-summary-of-sou-2010-49.pdf>.

Thompson, G.E. & Harred, J. L. (1992) 'Topless dancers: Managing stigma in a deviant occupation' *Journal Deviant Behavior*_13 (3) <https://doi.org/10.1080/01639625.1992.9967914>.

Tiggeman, M., & Kuring, J. K. (2004). 'The role of body objectification in disordered eating and depressed mood.' *British Journal of Clinical Psychology*, 43, 299-311.

Vasquez, E., Pina, A. & Bell, C. (2017) 'The sexual objectification of girls and aggression towards them in gang and non-gang affiliated youth.' *Psychology, Crime, and Law*
<https://www.kent.ac.uk/news/society/12377/link-between-sexual-objectification-and-aggression>.

Wright P.J., & Tokunaga, R.S. (2016). 'Men's objectifying media consumption, objectification of women, and attitudes supportive of violence against women.' *Archives of Sexual Behavior*, 45(4), 955-964. DOI: 10.1007/s10508-015-0644-8

Zillman D., & Weaver, J.B. (1989). 'Pornography and men's sexual callousness toward women.' In Zillman D. & Bryant J. (Eds.), *Pornography: Research advances and policy considerations* (pp. 95-125). Hillsdale, NJ: Lawrence Erlbaum.

OBJECTIFICATION RESEARCH – AN EXAMPLE

The chart below, from an objectification study published in 2012, shows how both men and women in our society are trained by culture (i.e. representations of women in society and in the media) to dehumanise women when they are presented wearing very little, revealing, clothing. In this study, the brains of both men and women (the ‘targets’) have processed images of women in underwear in the same way as they would process images of objects. However the images of men (whether or not in underwear) are processed using the special part of the brain reserved for humans. This study is one of a growing number of scientifically robust peer-reviewed research studies concerning the objectification of women. Together, they link the objectification of women with dehumanisation and inequality.¹²⁴

Are women human? – not when they are sex objects.

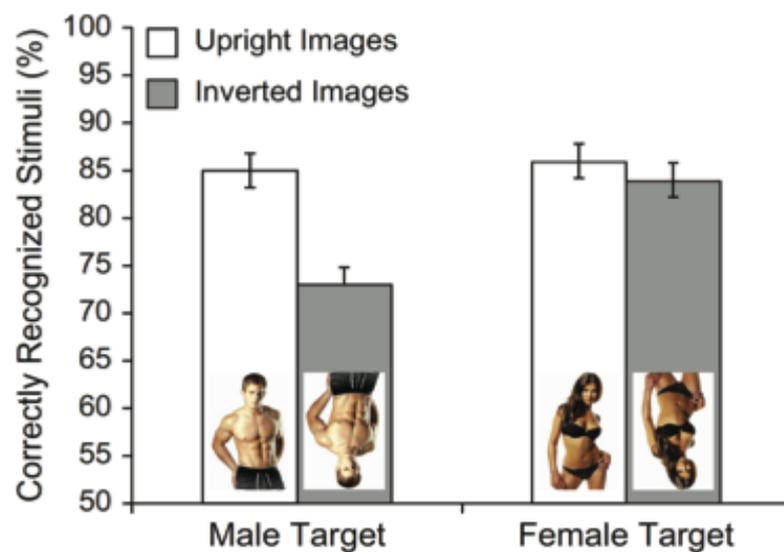


Figure 1. Percentage of correctly recognized stimuli as a function of target gender and target orientation. Error bars indicate ± 1 SEM.

“... our findings showed no differences related to participant gender, which suggests that cultural beliefs that women are sex objects are shared by both men and women”

Bernard et al. (2012)

¹²⁴ Bernard et al. (2012) University of Nebraska - Lincoln *Integrating Sexual Objectification With Object Versus Person Recognition: The Sexualized-BodyInversion Hypothesis* <http://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1568&context=psychfacpub>

Former dancers' words

Those working in the industry may put forward views to be considered in any policy review, and there is a place for those views to be taken into consideration. It would also be right to give weight to the voices of those who, having left the industry, say their experiences of performing have had a negative impact both personally and more broadly.

We have heard from women in the industry as well as those who have left the industry in the course of our work on SEVs and they have offered a range of views, which are mostly negative. We have used their views to shape our responses to consultations. However we do not have permission to share their words. There are some views that are in the public domain, primarily those gathered by former dancer Jennifer Hayashi Danna in research for her 2011 book¹²⁵ and those gathered in a consultation run by the campaign group Object¹²⁶.

In their own words: former SEV performers reflecting on their experience.

- “It’s utterly degrading.”
- “No one is the same after working in the industry. You get used to being treated as a second class citizen.”
- “It was the hardest work I have ever done, either physically, emotionally or mentally.”
- “Men need to stop thinking that it’s OK to pay for sexual entertainment. Paying for it doesn’t just hurt the women providing that service. It hurts all women. It hurts all of us.”
- “Men would come in and ask the manager did she have any black girls and I would be wheeled out like a prize cow. At the time it seemed normal, but with hindsight . . . “
- “We were encouraged to act like little girls, lost demure, submissive and dumb, which is what makes men part with money quickest.”
- “They wanted a bimbo who would be subordinate to them”
- “It was dehumanising, soul destroying and filled with desperation.”
- “The strange thing about lap dancing is how things that would be unacceptable in real life become normal in the club.”
- “Many parts of my time in dancing are difficult to talk about. Often if someone asked me about my experience as a dancer I have responded with a socially acceptable answer, and simply asserted that I enjoyed dancing, that I made a lot of money, but in the end dancing was not for me. This explanation in no way conveyed the extremity of emotion and mental distress I experienced as a dancer, and in no way conveys the sexual degradation and humiliation I experienced and observed during my short dancing career.”
- “I always thought of the customers as vermin and, ironically, that is what they thought of me”
- “It’s screwed up my view of men . . . Every time I see a man now, I just see him as a punter. There’s only so many bad experiences you can have before you start hating them all . . .”

¹²⁵ Stripped: The Bare Reality of Lapdancing by Jennifer Hayashi Danna with Sandrine Leveque

¹²⁶ Stripping the Illusion: the Lap Dancing Industry Exposed. <https://www.youtube.com/watch?v=Cwg57pLJZUI>

- “You start to see men as nothing more than their wallets, idiots to be fleeced for as much as you can. You start to despise them for believing you when you flutter your eyelashes and tell them they’re the most interesting customer that you’ve ever talked to.”

Kat Banyard interviewed a former dancer, “Lucy” for her 2010 book, the Equality Illusion. Lucy told her:

‘Lapdancing is one of the hardest things I have ever done. I’ve found it tough, soul destroying. You are constantly lying about who you are . . . Worst of all for me, you are forced to behave in a way which is consistently demeaning and submissive.” Lucy goes onto say that you let your boundaries slip in order to make money “But when everyone else is breaking the rules, you have to join in . . . The rules are broken all the time.”¹²⁷

Another former dancer told Banyard “it’s not glamorous or exciting at all, it’s a horrible world that is cruel and abusive to vulnerable women.” (p. 167)

Researcher Kely Holsopple (1998) asked women who were currently working as strippers about their views of customers. She reported that “Strippers are largely disgusted by customers and describe them as pitiful and pathetic, stupid and ignorant, sick, controlling and abusive.” She recorded a number of the strippers’ views:

- "They are weak abusers who have to subordinate women and girls to feel like a man."
- "I see my dad. They’re old enough to be my father."
- "Yuck. I am repulsed by the sight, sound, smell, and touch of them."
- "I’m embarrassed for them."
- "It affects your love-life and feelings about men."

In 2018 campaigner against sexual exploitation Sammy Woodhouse spoke out about her experience as a lapdancer and the links that she now acknowledges between violence against women and girls, exploitation and lapdancing. She was interviewed in August 2018 by Sky News.¹²⁸ In her own words:

- I started when I was about 18, I got into the industry while working as a model - I kind of fell into it. I wasn’t pressured, I wasn’t forced into it and it was entirely my choice. However, I was abused as a child and I left school with no qualifications, very low self-esteem, not much self-respect, and I kind of didn’t see anything wrong with it at the time. I did it for about nine years and what I noticed was a hell of a lot of the women that were dancers had been through something traumatic in their lives, they were abused as a child or had been through domestic violence and they were in that industry for reasons like my own - control, empowerment or just wanted to earn some easy money.
- I thought "this is my choice, my body, I can do what I want with it". I felt like I was in control of it and I felt like it was empowerment and when I look back now, I realise that's absolute nonsense. At the time, girls might be getting a lot of compliments, it might make them feel great, they're earning money but that's very short-lived. The impact long-term on your mental health and self-esteem is really very damaging.
- You take your clothes off and give a man an erection - that's not empowerment, that's not something little girls grow up and aspire to want to do. But I did it and it paid my bills. There were

¹²⁷ Banyard, Kat The Equality Illusion: The truth about women and men today 2010 Faber and Faber Ltd pp.136-137

¹²⁸ <https://news.sky.com/story/i-thought-lap-dancing-was-empowering-but-it-wasnt-11469167>

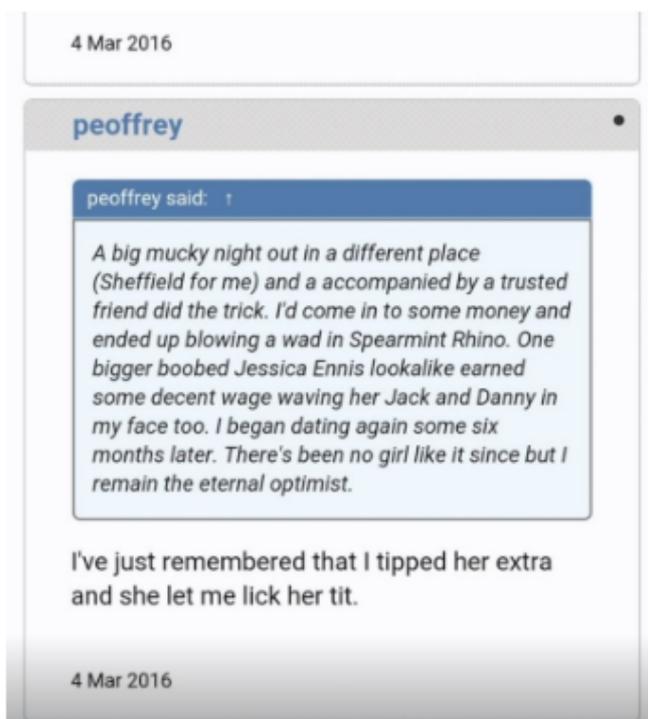
times when I made a lot of money, there were times when I didn't earn anything. The only people that win are the clubs.

- It's almost as if the clubs are grooming the girls to think that the people who work in these clubs are like a tight family network and that they care about the girls, that they're one big happy family. And it makes it really difficult for people to go against that and the moment they do, they're fired, they're shut down. Word will get round that they're a bad person to take on.
- Within the industry there's trafficking, prostitution, money laundering, fraud, drug and alcohol abuse and it's an industry that not many people know or understand. For the girls, how you get treated is horrendous. Some clubs are better than others but there is no way a club can control the amount of criminal activity that's happening. The verbal abuse I have received for speaking out has been absolutely shocking.
- At the time, if you had said to me the girls were being exploited - I would not have had any idea what exploitation was. A lot of things that were exploitative, I would not have realised were happening.
- No one should ever be expected to be touched, groped or assaulted. I know girls that have been drugged and raped. Some girls are drinking and taking drugs every night just to be able to do the job.
- It turned me against men, I viewed men as very weak and pathetic and I thought "you're giving me all your money". When you have that control it makes you feel good but now I realise that's not empowerment, that's manipulation.
- The simple fact is, the clubs don't want to raise the issues, the managers don't want to raise the issues and neither do the girls, because guess what? They're making money.
- Essentially, they're selling women - we're in 2018 and people think it's alright to go buy a woman for whatever sexual need it is?
- My message to women thinking about working in the industry and those who already are is - don't do it. You're worth so much more and I wish I had realised I was worth so much more and that I could go out there and do anything I put my mind to. There are plenty of ways you can earn good money without it being so damaging.
- I know you shouldn't have regrets but would I do it all over again? No, I would not.

In 2018, journalist Samantha Rea went undercover to work in eight different SEVs in London as a lapdancer. She wrote an account of her experiences for the Independent newspaper which can be read here: <https://www.independent.co.uk/voices/presidents-club-sexual-harassment-business-lap-dance-vip-exploitation-a8177691.html>

These reviews from customers have been found on a variety of online platforms and indicate a culture of disregard for the “no contact” rules and promises of sexual contact in exchange for more money (otherwise known as “extras”)

This reviewer states that extra cash gave him the opportunity to “lick” the dancer’s “tit.” This was sent to Licensing and objectors were informed that Licensing officers had visited the club and there was no cause for concern.





Andy Blake reviewed **Spearmint Rhino - Sheffield, UK** – 1★

18 Sep 2016 at 9:04p.m. • 🌐

Avoid the [redacted] 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.



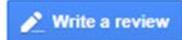
Spearmint Rhino - Sheffield, UK

1,371 likes



Spearmint Rhino Sheffield

60 Brown St, Sheffield

 Write a review

4.4  15 reviews 

Sort by: Most relevant 



Chief

Local Guide · 23 reviews · 1 photo

 3 months 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.

 Like



James Francis

1 review

 4 months ago

I enjoyed my experience. But drinks with price less, apart that it was great

 Like



PainfulExistence

2 reviews

 9 months ago

THE GIRLS R SOOOOO HOT THY RIDE MY COK LIK A GIR RIDES A HORSE

 1



Angel Head

2 reviews

Posted on this site:

lustnames.com

Search...

Login

Join now



Strip clubs → Europe → England → Sheffield → Spearmint Rhino



Spearmint Rhino

★★★★☆ 4 reviews

Add review

+44 (0)1142 798 092
60 Brown Street

Prices and features

Club type: Nude Dancers

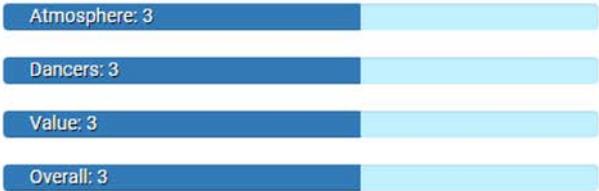
Dancers Ethnicity : White

Features: Beer and Wine, Full Bar, Bikini Dancers Only, Topless Dancers, Nude Dancers, Bikini Lap Dances

Dance price: 20

Drink price: 3

Dartime cover: 10



Comments and reviews

Atmosphere: ★★★★★ Dancers: ★★★★★ Value: ★★★★★ Overall: ★★★★★ *Joined us on Jan 2017*

I went on the tuesday, as it is a student night, meaning free entry with a student card!

10 pounds all night for dances were also really good value, and I ended up spending about 90 pounds, all in all it was very worth it and the girls were very attractive. You also get sambucca and tequila shots for a pound each which is great if you are looking to get a bit merry.

The club is a very good environment, and is as non-sleazy as a strip club could possibly be, and the girls are actually interested, and dont look bored out of their faces like most places ive been.

I have had a private dance before, and the girl was very good and naughty ;) Would definitely recommend spending some extra cash!

anonfig 2014-05-12 Visit Day: Tuesday Visit Time: After 0

“Naughty private dance” implies more than dancing

Atmosphere:
★★★★☆

Dancers:
★★★★☆

Value:
★★★★☆

Overall:
★★★★☆

Joined us on Jan 2017

Another visit to Spearmint Rhino sheffield; this time a little bit better than the last. Ventured in on a monday a little bit before 10pm and it was v. quiet as I expected. However, there were certainly more girls on this time than my sadly lacking previous visit. The prices are always very reasonable here, the £40 for 15 minutes is certainly one of the best deals around as the VIP rooms where you get taken are very plush, private and the girls are straight into the action. However, sometimes I feel 15 minutes without a break is a bit too long and my mind tends to wander, although it soon comes back again when some of these girls pummel there behinds into your groin. I swear it was almost painful a few times!!! In general the girls are pretty good looking but not stunning, they are pleasant enough and won't rush you and as usual for Spearmint Rhino the club is managed pretty well.



kally71

2005-10-13

Visit Day: Unknown

Visit Time:

0

Ends/