

# Cheltenham Borough Council Licensing Sub-Committee - Miscellaneous

**Meeting date:** 17 January 2024

**Meeting time:** 6.00 pm

**Meeting venue:** Council Chamber - Municipal Offices

---

## **Membership:**

Councillor Dr David Willingham (Chair), Councillor Angie Boyes (Vice-Chair), Councillor Diggory Seacome, Councillor Simon Wheeler and Councillor Ed Chidley

---

## **Important notice – filming, recording and broadcasting of Council meetings**

This meeting will be recorded by the council for live broadcast online at [www.cheltenham.gov.uk](http://www.cheltenham.gov.uk) and [www.youtube.com/user/cheltenhamborough](http://www.youtube.com/user/cheltenhamborough). The Chair will confirm this at the start of the meeting.

If you participate in the meeting, you consent to being filmed and to the possible use of those images and sound recordings for broadcasting and/or training purposes.

If you have any questions on the issue of filming/recording of meetings, please contact Democratic Services.

---

## **Speaking at Licensing Committee**

To find out more about Licensing Committee or to register to speak, please click [here](#) or contact Democratic Services.

**Please note:** the deadline to register to speak is 5.00pm on the day before the meeting.

---

**Contact:** [democraticservices@cheltenham.gov.uk](mailto:democraticservices@cheltenham.gov.uk)  
**Phone:** 01242 264 130

# Agenda

## **1 Apologies**

## **2 Declarations of Interest**

## **3 Public Questions**

## **4 Application for a renewal of an existing Sexual Entertainment Venue Licence (Pages 5 - 82)**

## **5 Local Government Act 1972 Exempt Information**

That in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 1 and 2, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 1; Information relating to any individual

Paragraph 2; Information which is likely to reveal the identity of an individual

## **6 New Hackney Carriage Driver's Licence (Pages 83 - 102)**

## **7 BRIEFING NOTES**

## **8 Any Other Items the Chairman Determines Urgent and Which Requires a Decision**

This page is intentionally left blank

## Miscellaneous Licensing Sub-Committee – 17<sup>th</sup> January 2024

### Local Government (Miscellaneous Provisions) Act 1982

#### Application for a renewal of an existing Sexual Entertainment Venue Licence

#### European Events Consultants Limited.

#### Report of the Licensing Team Leader

#### Case reference number: 23/01946/SEXR

#### 1. Summary and recommendation

- 1.1 Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 (“the Act”), as amended by section 27 of the Policing and Crime Act 2009, allows applicants to apply for, renew, vary and/or transfer a Sexual Entertainment Venue (“SEV”) licence where they wish to offer “relevant entertainment” on a frequent basis.
- 1.2 In this case a renewal application for an existing SEV licence was submitted on 6 December 2023 for Under the Prom, 109 Promenade, Cheltenham. GL50 1NW.
- 1.3 The current licence runs from 7<sup>th</sup> February 2023 until 6<sup>th</sup> February 2024 this subsequent application is to effectively renew that licence for the period 7<sup>th</sup> February 2024 to 6<sup>th</sup> February 2025. The existing days and hours for relevant entertainment and those of the variation are shown at **ANNEX 1** and are NOT varied through this application.

#### 1.4 Implications

##### Legal

Any applicant who is refused a licence may, within 21 days of being notified of the refusal, appeal to the local magistrates' court.

However, the right to appeal does not apply where the licence was refused on the grounds that:

- the number of sexual entertainment venues in the area exceeds the number which the authority considers is appropriate
- the grant of the licence would be inappropriate considering the character of the area, the nature of other premises in the area, or the premises themselves

**Contact officer: One Legal**

**E-mail: [legalservices@onelegal.org.uk](mailto:legalservices@onelegal.org.uk)**

**2. Background**

- 2.1 On 1 October 2014, Council approved the adoption of the amended provision of Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 to take effect in the borough on 1 December 2014.
- 2.2 Since the adoption, any premises that want to offer “relevant entertainment” on a frequent basis can only do so by obtaining a SEV licence.
- 2.3 Relevant entertainment is defined as any live performance or any 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 the audience (whether by verbal or other means).
- 2.4 **It should be noted that under the law any premises can provide relevant entertainment on an infrequent basis without the need for a SEV licence. An infrequent basis is defined under the Act as no relevant entertainment has been provided on more than 11 occasions within a 12 month period and no such occasion has begun within a period of one month beginning with the end of the previous occasion, and no such occasion has lasted longer than 24 hours. Any premises wishing to offer relevant entertainment more frequently are required to apply for a SEV licence.**

**3. Consultation**

- 3.1 An applicant for a Sex Establishment Licence must give notice of their application in accordance with the requirements set out in schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982. The advertising requirements are the following:-
  - 3.1.1 Publishing an advertisement in a local newspaper circulating in the appropriate authority’s area, not be later than 7 days after the date of the application; and
  - 3.1.2 Where the application is in respect of premises, notice of it shall in addition be displayed for 21 days beginning with the date of the application on or near the premises and in a place where the notice can conveniently be read by the public.
- 3.2 Schedule 3, paragraph 10(15) of the Local Government (Miscellaneous Provisions) Act 1982 states:

“Any person objecting to an application for the grant, renewal or transfer of a licence under this Schedule shall give notice in writing of his objection to the appropriate authority, stating in general terms the grounds of the objection, **not later than 28 days after the date of the application.**” [Emphasis Added]
- 3.3 The applicant has advertised the application in accordance with the statutory requirements set out above.
- 3.4 In determining the application, Members must have due regard to any observations made by the Chief Officer of the Police and any other comments made by anybody else.
- 3.5 It should be noted that officers had recently agreed to notify 2 local representative bodies - GRASAC (Gloucestershire Rape and Sexual Assault Centre) and the BID and did so.

- 3.6 Members are to note in particular that **Page 7**tion must relate to both or either of the mandatory or discretionary grounds for refusal set out below.
- 3.7 Objections made on moral grounds or values are not relevant to either the mandatory or discretionary grounds for refusal and should therefore not be considered relevant.

**Consultation – Chief Officer of Police**

- 3.8 The Chief Officer of Police did not raise any objections in relation to this application.

**Consultation – Other Persons**

- 3.9 In relation to this application the licensing authority received 36 objections and 50 emails/ letters of support from residents and others during the statutory consultation period. Copies of these are attached at **ANNEX 2 (along with attachments at ANNEXES 2 i and ii) and 3 respectively.**
- 3.10 There is no discretion for the authority to extend the statutory deadline for consultation therefore, the objections received outside the statutory deadline for comments has not been included in this report.

**4. Policy Considerations**

- 4.1 The authority’s adopted policy statement in relation to the regulation and control of SEVs was adopted by Full Council on 29 July 2020, and this policy statement sets out the authority’s guidance, application procedure, terms and conditions relating to the regulation of SEVs.
- 4.2 Below (para. 4.4 – 4.15) are relevant extracts from the policy to highlight relevant issues to Members. However, Members should read these in conjunction with the policy document for completeness and contextual understanding.
- 4.3 As a regulatory matter, the authority does not take any moral stand in adopting this policy. The authority recognises that Parliament has made it lawful to operate a sex establishment and that such businesses are a legitimate part of the retail and leisure industries. It is this authority’s role as the Licensing Authority to administer the licensing regime in accordance with the law.

**Determination (Section 11)**

**Mandatory Grounds for Refusal**

- 4.4 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 made;

- d) to a body corporate which is not in **Page 8**d in an EEA State; or
- e) to any person who has, within a period of 12 months immediately preceding the 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**

4.5 A licence may be refused where:

- a) the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reason;
- 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 made the application himself;
- c) the number of SEVs in the relevant locality at the time the application is made is equal to or exceeds the number which the Council consider is appropriate for that locality (nil may be an appropriate number for these purposes);
- d) the grant or renewal of the licence would be inappropriate, having regard:
- 1) to the character of the relevant locality; and/or
  - 2) to the use to which any premises in the vicinity are put; and/or
  - 3) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

### **Location of Premises (Section 12)**

- 4.6 In deciding the appropriate number of premises to be licensed, the authority must consider the character of the relevant locality and what is the appropriate number of SEVs for the relevant locality. The number can be 'nil'.
- 4.7 Cheltenham is a relatively small urban borough that is predominantly residential in nature. The authority has already resolved that it is inappropriate to licence SEVs in or in the vicinity of, amongst others, residential areas. It is the authority's policy therefore that there is no locality outside of the Designated Permitted Area (shown on **ANNEX 4** attached) in which it would be appropriate to license a SEV. Accordingly the appropriate number of SEVs for outside of the Designated Permitted Area is nil.
- 4.8 The authority recognise however that the Designated Permitted Area offers a more varied situation in as much as it has a much wider mix on offer, particularly in the night time economy and it may therefore be appropriate to consider applications for SEVs in the area. The authority has therefore resolved that it will not set a limit on the number of permitted SEVs in the Designated Permitted Area providing those premises are not near properties with sensitive uses or in sensitive locations.



4.9 It must be noted that this venue is situated outside of that area but that the authority decided to grant the original application in respect of this venue. It should still consider that issue, but must give weight to the fact it granted the licence previously.

### **Properties with sensitive uses or in sensitive locations**

4.10 In considering if the grant, renewal or variation of the licence would be inappropriate, having regard to the character of the relevant locality or to the use to which any premises in the vicinity are put, the authority shall consider, amongst other things, whether the grant of the application would be appropriate, having regard to:

- a) The fact that the premises are sited in a residential area;
- b) Whether the premises are sited near shops used by or directed at families or children, or on frontages frequently passed by the same;
- c) Whether the premises are sited near properties which are sensitive for religious; and/or
- d) Whether the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families.

### **Objections (Section 14)**

4.11 When considering an application for the grant, renewal, variation or transfer of a SEV licence the authority will have regard to any observations submitted to it by the Chief Officer of Police and any objections that have been received from anyone else within the statutory consultation period. Any person can object to an application provided that the objection is relevant to the discretionary grounds for refusal of a licence.

4.12 Objections should not be made on moral grounds or values and the authority will not consider objections that are not relevant to the grounds mentioned above.

4.13 Objectors must give notice of their objection in writing, stating the general terms of the objection.

4.14 Where the authority receives notice of any objection it will, before considering the application, give notice in writing of the general terms of the objection to the applicant. However, the authority shall not without the consent of the person making the objection reveal their name or address to the applicant.

4.15 Objections may only be made within the period of 28 days following the date on which the application was made to the authority.

## **5. National Guidance (March 2010)**

5.1 The Government has issued non-statutory guidance to aid local authorities carrying out their functions under Schedule 3, as amended by section 27.

5.2 Although it is non-statutory guidance, local authorities are encouraged to have regard to the guidance when exercising their functions (although there is no statutory requirement to do so) in order to promote best practice and consistency across England and Wales.

- 5.3 Below (para. 6.4 – 6.14) are relevant **Page 10** on the policy to highlight relevant issued to Members. However, Members should read these in conjunction with the guidance document for completeness and contextual understanding.

### **Meaning of Sexual Entertainment Venue**

- 5.4 Paragraph 2A of Schedule 3 as inserted by section 27 sets out the meaning of a ‘sexual entertainment venue’ and ‘relevant entertainment’ for the purposes of these provisions. A sexual entertainment venue is defined as “any premises at which relevant entertainment is provided before a live audience for the financial gain of the organiser or the entertainer.” (para 2.1)
- 5.5 The meaning of ‘relevant entertainment’ is “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). (para 2.2)

### **Refusal of a Licence**

- 5.6 When considering an application for the grant, renewal or transfer of a licence the appropriate authority should have regard to any observations submitted to it by the chief officer of police and any objections that they have received from anyone else within 28 days of the application. Any person can object to an application but the objection should be relevant to the grounds set out in paragraph 12 for refusing a licence. Objections should not be based on moral grounds/values and local authorities should not consider objections that are not relevant to the grounds set out in paragraph 12. Objectors must give notice of their objection in writing, stating the general terms of the objection. (para. 3.23)
- 5.7 When determining a licence application, the local authority must have regard to any rights the applicant may have under Article 10 (right to freedom of expression) and Article 1, Protocol 1 (protection of property) of the European Convention on Human Rights. (para. 3.30)
- 5.8 The Provision of Services Regulations 2009 amended Schedule 3 to the 1982 Act to state that, if having considered an application for the grant, renewal or transfer of a licence, the appropriate authority decides to refuse it on one or more of the above grounds, it must provide the applicant with reasons for the decision in writing. (para. 3.31)

### **Relevant Locality**

- 5.9 Paragraph 12(3)(c) and 12(3)(d) of Schedule 3 allow appropriate authorities to refuse applications on grounds related to an assessment of the “relevant locality”. A licence can be refused if either, at the time the application is determined, the number of sex establishments, or sex establishments of a particular kind, in the relevant locality is equal to or exceeds the number that the authority considers appropriate for that locality; or that a sex establishment would be inappropriate having regard to the character of the relevant locality, the use to which any premises in the vicinity are put or the layout, character or condition of the premises. Nil may be the appropriate number. (para. 3.32)
- 5.10 Schedule 3 to the 1982 Act does not define “relevant locality” further than to say that:
- a. in relation to premises, it is the locality where they are situated; and

b. in relation to a vehicle, vessel or stall or other place of public accessibility where it is desired to use it as a sex establishment. (para. 3.33)

5.11 Clearly, the decision regarding what constitutes the 'relevant locality' is a matter for the appropriate authority. However, such questions must be decided on the facts of the individual application. (para. 3.34)

5.12 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. Nevertheless, all applications must be considered on their individual merits. (para. 3.35)

### **Licence Conditions**

5.13 Once the appropriate authority has decided to grant a licence they are able to impose terms, conditions and restrictions on that licence, either in the form of conditions specific to the individual licence under paragraph 8 of Schedule 3 or standard conditions applicable to all sex establishments, or particular types of sex establishments, prescribed by regulations made by the appropriate authority under paragraph 13 of Schedule 3. (para. 3.39)

### **The Services Directive**

5.14 Schedule 3 to the 1982 Act constitutes an authorisation scheme under Article 9 of the EU Services Directive 2006/123/EC ("the Directive") which was implemented in the UK by the Provision of Services Regulations 2009 ("2009 Regulations"), which came into force on 28th December 2009. Local authorities must ensure they comply with the Regulations when applying the licensing provisions in Schedule 3. (para. 3.53)

## **6. Public Sector Equality Duty (PSED)**

6.1 The PSED places a statutory duty on the council, in the exercise of its functions, to have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

6.2 Protected characteristics are:

- a) age
- b) disability
- c) gender reassignment
- d) pregnancy and maternity
- e) race
- f) religion or belief
- g) sex
- h) sexual orientation

- 6.3 The licensing and regulation of SEVs (Page 12) in the authority's PSED and therefore the authority must have regard to the matters listed above when, for example, setting policy and issuing licences.
- 6.4 The licensing and regulation of SEVs often creates a tension between the statutory right to operate such a venue and equality issues relating to discrimination and objectification of primarily women.
- 6.5 The starting point for the authority is the fact that it cannot take any moral stand in relation SEVs in recognition that Parliament has made it lawful to operate a sex establishment. This starting point however does not mean that the authority is therefore bound by the primary legislation at the expense of other statutory requirements.
- 6.6 When setting policy or determining individual applications, the authority must have regard to its PSED taking into account the individual merits of each application.
- 6.7 Equality issues may be relevant to (not exhaustive):
- a) The need to protect performers from harassment and threat;
  - b) The need to ensure that any protected characteristic group is not more, or less, welcome than another;
  - c) The need to properly consider the fear of any protected characteristic group using and accessing public spaces, facilities and infrastructure;
  - d) The need to properly understand the relevant locality and the need to ensure, taking into account the relevant locality, any protected characteristic group's view is taken into account such as those relevant to religion or belief or race;
  - e) The need to consider the views and experiences of people with disabilities as a protected characteristic group.
- 6.8 Some or all of these equality issues may be addressed through appropriate conditions and robust enforcement. Equally, the licensing process may also be an important tool to achieve the same outcome, for example, licence reviews and policy changes.
- 6.9 **High Court Decision - *THE KING (on the application of ) CDE and BOURNEMOUTH, CHRISTCHURCH AND POOLE COUNCIL [2023] EWHC 194 (Admin)***
- 6.10 In February 2023 the High Court considered a judicial review of the decision to adopt a new SEV policy. This case was stemmed from the following considerations (note - ground 3 does not seem relevant to the variation before Members):-

*The Claimant contends that the Defendant erred in that it failed to have regard to and/or conscientiously engage with these SEB concerns by dismissing them as amounting to "moralistic" objections which could not be considered in determining whether to adopt the Policy and the NCP in particular. In so doing, the Defendant is also said to have failed to comply with the Public Sector Equality Duty ("PSED") under s.149 of the Equality Act 2010 ("the 2010 Act"). These two matters form the basis of Grounds 1 and 2 of the Claimant's challenge. The Claimant further contends that the effect of the ARP is unlawfully to fetter the Defendant's discretion in respect of licensing decisions which Parliament has decreed should be reviewed on an annual basis. That is Ground 3.*

6.11 This case is referenced to ensure that **Page 13** consider the High Court decision as far as it would be relevant and appropriate to do so. The key points of focus would seem to be that the PSED, in the context of local authority decision making generally, must be given 'rigorous consideration' of the PSED based on a 'proper and conscientious focus on the statutory criteria'

6.12 The case can be found in full at - <https://www.bailii.org/ew/cases/EWHC/Admin/2023/194.html>

6.13 A summary and analysis of the case can be found here - <https://www.localgovernmentlawyer.co.uk/licensing/399-licensing-news/52893-high-court-judge-quashes-decision-to-introduce-no-cap-strip-club-licensing-policy>

## 7. **Officer Comments**

7.1 When determining an application for a sexual entertainment venue licence, the committee must have regard to the relevant statutory provisions, the authority's adopted policy, the relevant guidance issued by the Home Office and any objections or comments made by the Chief Officer of Police and other persons.

7.2 The merits or otherwise of the application and representations should be considered and weighted accordingly; and the committee should then come to its conclusions only after considering all relevant written evidence and hearing, any relevant verbal amplification and clarification of said evidence, at the hearing itself.

7.3 The committee should consider the Public Sector Equality Duty and ultimately act in the public interest in considering this application.

7.4 The committee is reminded that the authority does not take any moral stand in relation to operation of sex establishments such as sexual entertainment venues because the authority recognises that Parliament has made it lawful to operate a sex establishment and that such businesses are a legitimate part of the retail and leisure industries. It is this authority's role as the Licensing Authority to administer the licensing regime in accordance with the statutory provisions. However, it must be cognisant of any relevant considerations in this respect in relation to the recent court case on the setting of SEV policy, although it should be noted that the case was not related to an application. Members should ensure that they only consider the elements of that case, as far as they believe they are relevant to the determination of a variation application.

7.5 Furthermore, the committee must be mindful of its Public Sector Equality Duty under the Equality Act 2010 in any event.

7.6 As mentioned previously this venue sits outside the council's Designated Permitted Area and was granted a licence. The council's policy is to not grant applications in this location and if the committee does decide to grant this variation it should give clear and cogent reasons for continuing to depart from that policy principle.

7.7 Having considered all the relevant matters, the committee must decide whether to:

a) Grant the variation application as applied for;

- b) Grant the application subject to an **Page 14** terms, conditions and/or restrictions that are either specific to the licence or standard conditions; or
- c) Refuse the application.

---

**Background Papers**

Sexual Entertainment Venues: Guidance for England and Wales (March 2010)

Cheltenham Borough Council Sexual Entertainment Venue Policy Statement adopted Full Council on 29 July 2020

Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982, as amended by section 27 of the Policing and Crime Act 2009

**Case Officer**

**Contact officer: Jason Kirkwood**  
**E-mail: [licensing@cheltenham.gov.uk](mailto:licensing@cheltenham.gov.uk)**

**ANNEX 1 – Hours and Days of Application**

**Hours and days of current licence:-**

As per below

**Hours and days of renewal:-**

Days and Hours

The days and hours applied for in respect of the renewal are as follows:

Friday ,Saturday and early hours of Sunday for the Cheltenham Racecourse November Meetings each year. Dates to be confirmed in writing 1 month prior to each Cheltenham Racecourse November Meeting event to the Council and Police.

Friday of the November Meeting – 8pm to 5am the day following.

Saturday of the November Meeting – 8pm to 5am the day following.

Monday to Friday of Cheltenham Festival Week each year. Dates to be confirmed in writing 1 month prior to the event to the Council and Police.

March – Cheltenham Festival Monday 8pm to 5am the day following

Cheltenham Festival Tuesday 6pm to 5am the day following

Cheltenham Festival Wednesday 6pm to 5am the day following

Cheltenham Festival Thursday 6pm to 5am the day following

Cheltenham Festival Friday 6pm to 5am the day following

**In addition:-**

The application is to renew the SEV licence on same terms as the existing SEV licence including the varied standard condition 6:

“There shall not be displayed outside the premises, in the immediate vicinity, or elsewhere within the Town any advertisements that indicate or suggest that any form of Relevant Entertainment takes place on the premises. This includes the display of any advertisement, word, letter, model, sign, light, placard, board, notice, device, representation, drawing, writing or any matter or thing (where illuminated or not) by means of externally displayed advertisement (such as on billboards or posters) within the councils administrative area.

1. The Applicant is allowed to solicit individuals to attend the premises during the hours the licence is in operation, provided that no solicitation takes place to anyone who appears to be under the age of 25.

2. The Applicant is allowed to operate a courtesy vehicle to transport dancers and clientele to and from the venue at all times. Further to be allowed to advertise, including by way of leaflets, the courtesy vehicle at all times during the permitted licence hours. No music will be played that can be heard from outside the vehicle. The use of the name 'Eroticats' is permitted.

The reason for the disapplication of this condition is permit a vehicle to transport clientele to and from the venue at all times and for staff to be permitted to give out leaflets for the courtesy bus in the Town.”



## SEXA Objection Comments

1.

I continue to be shocked that Sexual Entertainment venues are being licensed in Cheltenham. Everyone involved in the decision making for this application with have undergone Equality, Inclusion and Diversity training so there is no excuse not to understand the protected characteristics and the statutory duty placed on the council. I believe that allowing venues which are specifically for men to pay in order to gain sexual stimulation from women is in breach of equality law.

Would the licence be granted if men were providing sexual stimulation for other men?

Would the licence be granted if people of colour were providing sexual stimulation for white people?

Would the licence be granted if people with a disability were providing sexual stimulation for able bodied people?

If not, then why is it only women who's protected characteristic can be exploited in this way?

*6. Public Sector Equality Duty (PSED) (attached at ANNEX 5)*

*6.1 The PSED places a statutory duty on the council, in the exercise of its functions, to have due regard to the need to:*

*a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*

**This venue legitimises discrimination against women, portraying them as sexual objects. It encourages harassment in the context of the entertainment. No woman who does not need money will choose to work in this environment. Most will be young and many will be foreign. They are very vulnerable to exploitation in this kind of work.**

*b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*

**Where are the opportunities for the women? Do men and women both dance and observe in this venue or is it exclusively women dancing for men?**

*c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

**This definitely does not promote good relations between men and women but seeks to perpetuate misogyny.**

*6.2 Protected characteristics are:*

*a) age* **This venue will mainly exploit younger women**

*b) disability*

*c) gender reassignment*

*d) pregnancy and maternity*

*e) race*

*f) religion or belief*

*g) sex* **This is primarily exploitation of women based on their sex.**

*h) sexual orientation*

Please consider why you are prepared to legitimise discrimination against women and ignore your statutory duty in this case.

## 2. Rt Hon Alex Chalk KC MP

I am writing to object to the above application. An SEV at this (or indeed any) location in Cheltenham would be wholly inappropriate, and I urge CBC to use its broad discretion to refuse it.

By way of context, the Policing and Crime Act 2009 reclassified lap dancing clubs as “sexual entertainment venues” [SEVs] and gave local authorities the power, if they adopted the legislation, to regulate such venues as sex establishments under Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 [Schedule 3]. The change introduced by section 27 of the 2009 Act was in response to concerns that, under the Licensing Act 2003, local communities did not have sufficient powers to control where lap dancing clubs were established. According to the Home Office Guidance, the reclassification allows local authorities like CBC to refuse a licence application on wider grounds than under the 2003 Act and gives local people a greater say in the licensing process. Indeed, para 1.3 of the Guidance states as follows:

Section 27 gives local authorities more powers to control the number and location of lap dancing clubs and similar venues in their area...these provisions will allow local authorities to refuse an application on potentially wider grounds than is permitted under the 2003 Act and will give local people a greater say over the regulation of lap dancing clubs and similar venues in their area. As noted above, I would invite CBC to use those powers. I would further note that Philip Kolvin, Licensed premises: law, practice and policy (2nd ed), Bloomsbury, 2013, p668 states that the grounds for refusing a licence under Schedule 3 “confer a wide discretion and will not easily be shown to be unreasonable...”

On the specifics of this application, as has been noted in a previous application for this venue, it lies outside of the local authority’s Designated Permitted Area. The local authority policy is “that there is no locality outside of the Designated Permitted Area in which it would be appropriate to licence a SEV. Accordingly, the appropriate number of SEVs for outside of the Designated Permitted Area is nil”. This speaks for itself, and strongly militates in favour of refusal.

Under the Prom is situated amongst other non-related businesses, including estate agents, hairdressers, and restaurants. Having an SEV located near to these other businesses, especially with operational times to begin at 8pm, is wholly inappropriate. It is entirely feasible that families with children may be in the area at this time, and so should not be the case that they have to walk past an operating SEV.

I would be grateful if the above points could be taken into consideration.

**3. No address provided comments not included. The address was requested on receipt of the comments and yet was not provided by 03/01/2024. It was made clear that names and addresses of persons making comments would not be put into the public domain, and that we needed names and addresses for audit purposes to demonstrate that comments are made in good faith. This is the case with all comments so marked below.**

## 4.

I am writing to object to the granting of an SEV license to Under the Prom (23/01946/SEXA) for March 24 and Nov 24.

Sex work has no place in modern society. It is disrespectful to women, objectifying them. The women are frequently trafficked or vulnerable women who have no alternative. The women and girls of Cheltenham also suffer the consequences of men visiting the town just to visit venues like this. They feel less safe on their own streets.

Please refuse this licence.

5.

I am writing to object to this application for the renewal of a licence to operate a sexual entertainment venue at Under the Prom in Cheltenham. (Number 23/01946/SEXR)

Point 12.2 of the SEV policy statement adopted by Cheltenham Borough Council in 2020 states that the council voted to set a nil limit for SEV's outside of the designated permitted zone. As Under the Prom is outside of this zone, a decision to grant a licence goes against the democratic decision making of the council and a case for the refusal of this application exists.

Given that a licence has recently been granted for an SEV located within the permitted designated zone (Jessop House, Cambray Place) there is no rationale for the granting of this licence.

Furthermore, the SEV policy contains 40 standard conditions which the committee has the power to enforce or deviate from.

Having reviewed the plans for the venue in person, I have the following comments.

It appears that the relevant entertainment will take place in the basement of the venue in the main building and a temporary structure erected at the rear of the venue. There appear to be approximately 30 booths spread across the venue, with the bulk (c 20) located in the temporary structure.

Having viewed the plans on a screen it is not possible to understand the measurements for the booths within which performances will take place. This is required by section 2.5 of the policy.

Condition 18 states that there can be no physical contact between the performer and customer. If the measurements cannot be understood, then assurance that this licence conditions will be complied with is not possible.

Within the hand drawn plans for the temporary structure dated 6/12/2022 there is an area whose purpose does not appear to be identified on the plans. Looking at the plans (and the legend provided in picture 3) it appears that the area has performers and customers in very close proximity (see attached picture number 1). It would be prudent for the purpose of this area to be confirmed so that the committee can assure itself that the conditions within the SEV policy intended to safeguard performers are being met.

Picture 2 has an outline of booths; it is not clear how many booths are included within the area or indeed their size. Again, it would be prudent for this information to be provided.

Public Sector Equality Duty.

The Council and by extension the committee to have a duty, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the (Equality) Act.

- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

PSED duty to eliminate harassment of women and girls.

On 1 February 2023 the CEO of GRASAC confirmed to the licensing committee that “there is evidence from women in race week, including those giving out fliers, that they are groped, grabbed, touched and threatened; a volunteer from Cheltenham Guardians has confirmed that they are extremely busy in race week, intervening many times to stop men from cornering women”.

PSED duty to foster good relations between men and women.

Strip clubs create a social environment that allows male privilege and domination over women and where women are objectified for the sexual arousal and pleasure of men. This increases the view, for some men, that they are entitled to seek access to women’s bodies whenever they wish regardless of whether the woman consents.

It is unrealistic to expect that (some) men who pay women to dance naked for their sexual gratification in one part of Cheltenham will not be influenced by this experience in other parts of Cheltenham and indeed in their interactions more widely with other women and girls in society.

PSED duty to women working in the SEV.

“Research shows that women who work in stripping are subject to high levels of abusive behaviour by customers: research in the U.S. (Holsopple, 1998) found that 100% of the women working in lap dancing who were surveyed reported that they had experienced physical violence from customers. All the women had been sexually abused in the club. All the women had been verbally harassed.” (Source Safe and Equal Bristol report: Sexual Entertainment Venues Policy Review (November 2021)).

PSED duty to women and girls in the vicinity and PSED duty to women and girls more widely in society

It is not sufficient to only consider women working in the SEV or in the vicinity of the SEV. The PSED requires the Committee to consider the impact on women and girls more widely in society. This was confirmed in the Bournemouth 2023 judicial review.

The evidence of the GRASAC CEO from February 2023 included above supports these PSED duties.

This is supported by extensive evidence that women’s “sense of security and entitlement to public space” are reduced when strip clubs are present. (Object UK). No go zones for women are in effect created. Again, this is arguably discrimination.

The following is an excerpt from the Safe and Equal Bristol report: Sexual Entertainment Venues Policy Review (November 2021)

“In the largest ever multinational study of male violence against women published in 2013 by the United Nations, 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. 70-80 percent of men who had raped reported that they believed they had the right to sex. The second most frequently reported motivation was related to entertainment-seeking – interpreting forced sexual access to women’s bodies as fun or as something to alleviate boredom. 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”.

There is clear evidence at a local, national, and indeed international level that the presence of SEVs is harmful towards women whether they work within the SEV or are in the vicinity of it. Additionally, the reinforcement of male entitlement and objectification of women harms women in wider society.

### Conclusion

From the discussions I have observed it is unclear how the Committee has considered its duty towards women and girls in society given the overwhelming evidence that men who believe they are entitled to access to women’s bodies are more likely to perpetrate sexual violence.

In 2020 the Council voted to set a nil limit for SEV’s outside of the designated permitted zone. As this venue is outside of the zone the committee should respect this decision and decline to grant this renewal application.

If the committee grants the licence, there is no compelling rationale or evidence that supports deviating from the standard licensing conditions within the council’s current SEV policy.

### **6. On behalf of the Nelson Trust**

Dear Members of the Licensing Committee,

The Nelson Trust is writing to emphatically oppose the license renewal application of Under the Prom’s Sexual Entertainment Venue License for the March 2024 race week and November 2024 race meets submitted by Eroticats. The Nelson Trust objection to Sexual Entertainment Venues remains steadfast and is rooted in profound concerns over sex equality. The strong opposition echoed in the October 4, and November 18 Licensing Committee meetings by numerous groups, local residents and Alex Chalk, MP, only reinforces the community’s collective stance against the normalisation of SEVs. Our line of reasoning has not changed and as such we submit our previous objection below.

We believe that where Sexual Entertainment Venues (SEVs) operate there are always multiple harms that cannot be mitigated. Our objection to this application is based on years of frontline professional experience supporting women involved in the sex trade.

The Nelson Trust is a gender-responsive and trauma-informed organisation that works with women involved in the sex trade in Gloucestershire to help address their complex and multiple needs. There are strong links between lap dancing and selling sex, with a UK Home Office report finding that the majority of lap dancers also sell sex. The longer a woman has been stripping, the more likely it is she will be selling sex ([Prostitution\\_and\\_Sex\\_Work\\_Report.pdf](#)). Other research studies also indicate that alcohol and drug abuse is standard in the lap dancing industry, if not integral to the job ([The occupational milieu of the nude dancer: Deviant Behavior: Vol 18, No 2 \(tandfonline.com\)](#)), both by dancers and punters. This places women both in and outside of SEVs at even more risk of assault. Research also indicates considerable use of Class A drugs, initiated after entering the trade.

This published evidence supports our experience on the ground; most women we support have been through adverse childhood experiences, have been involved in domestic abuse relationships and often use drugs and alcohol as a coping mechanism. Women often are unable to realise the harms of the sex trade until they are out of it. One of the women we supported to exit wrote her story in her own words, and here is an extract of how someone might end up involved in the sex trade: 'I was forced into selling sex at the age of 17 and it then became a choice I made with an addict's insane mind that I could fund my habit selling my body. But what I didn't realise is that I was not just selling my body, but I was selling a part of my soul each time I did this. And chipping away at my self worth, my self-esteem and slowly but surely losing any empowerment as a woman I had or could have.' This woman's story is not uncommon, and it is a voice that does not often get heard, as many women do not have access to support to address their unmet needs and increase their life choices, including the opportunity to exit the sex trade.

The CBC's responsibility to foster good relationships between men and women, in accordance with their Public Sector Equality Duty seems to conflict with the granting of new and/or variation of licenses for SEVs.

After carefully considering the published evidence, the CBC's legal responsibilities, our professional experience, and the voices of women who have exited, The Nelson Trust vehemently opposes the granting of SEV licenses and/or variations to licenses as we believe they are incompatible with women's rights, safety & equality. CBC has an opportunity to show leadership and enforce their Public Sector Equality Duty by rejecting this licence renewal application.

We stand with GRASAC, Alex Chalk, MP, and many local people who are object to Sexual Entertainment Venues in our communities. We urge the committee to contribute actively to the council's pledge for women's safety and use its influence and the legal means available to it to close the frequency exemption permitted under UK law. This move would align with the community's aspiration for a safer, more equitable environment.

With kind regards,

The Nelson Trust

### **7. No address provided**

### **8.**

I write to object to Under the Prom's application to renew their Sexual Entertainment Venue license so they can host Eroticats lap dancers. (Ref 23/01946/SEXR).

The Eroticats website makes it clear that lap dancing means stripping. This is inherently harmful for the women involved and the public, especially young women.

Reports from Nordic Model Now and Not Buying It (Stripping the Illusion) describes the emotional, financial, and physical harm in detail.

Cheltenham council's own community impact assessment describes how it is women that are affected.

Of course, those making money from lap dancing will deny this impact, just as tobacco companies and smokers used to deny the impact of smoking.

The police will not object and they will say no incidents have been reported. The failure of the police and criminal justice system to tackle male violence against women and girls will not be addressed.

Lap dancing should be treated as a public protection issue, in the same way as smoking. No one is banning smoking but there are strict restrictions on advertising and sales.

Cheltenham councils' community impact statement claims their controls on advertising are enough to mitigate against harm. This is dangerously naive.

The company name and phone number on flyers, the bus and tabards are more than enough to get the message out there. A simple Google search will bring up the Eroticats website and leave people with no illusions about what lap dancing means.

The inclusion of the phone number means the company can gather personal details of potential customers which any businessperson will understand the value of.

Cheltenham is failing in its duty of care to especially its duty of care to young women on a low income with a history of abuse – those most likely to work as strippers. Calling it a “choice” dismisses the harm that this work does to women and makes it more difficult for them to recover.

It was heartening to see the restrictions placed on how banners are displayed at the last meeting. Please do more to reduce the harm caused by these licences. There have been numerous objections made over the years. It is clear that very few ordinary people want lap dancing provision to be a routine part of race events in Cheltenham.

9.

I write as an avid fan of National Hunt Racing. Please refuse this application under sec 11.2d of your Sexual Entertainment Venues Policy. Having thoroughly enjoyed my visits to Cheltenham in the past, both to attend the races and visiting the town, I'm dismayed that this form of male entertainment is thought appropriate in such a lovely part of the country. This industry, a cover for prostitution in many cases, encourages the attitudes prevalent among so many men that women are inferior beings to be ogled at and used as they see fit. As well as potentially endangering local and visiting women and girls, this "entertainment" takes trade from legitimate licensed premises.

In addition, there is a requirement to undertake an equalities assessment. Research suggests that these venues have a detrimental effect on crime and women's wellbeing.

References:

Hipp et al 2021

Patiniotis & Standing 2012

<https://dpglaw.co.uk/strip-club-licensing-curbed-after-court-rules-wider-harm-to-women-and-girls-could-not-be-ignored/>

**Please see separate 3 PDFs - *Fact Sheet on Lap Dancing, Still-Stripping-the-illusion, and an article on the effects of lap dancing clubs***

**10. On behalf of GlosWomen**

Dear Licensing Team

Date: 24 December 2023

**SEV Licence Application - 23/01946/SEXA**

We are writing on behalf of our members to object to the application submitted by European Events Consultants Limited to allow for lap dancing at Under the Prom, 109-113 Promenade, Cheltenham to coincide with race meets at Cheltenham Racecourse during November and Cheltenham Festival Week in March.

We refer to our letters of objection dated 10 September 2023 and 10 November 2023 (copies of which are attached) which detail our concerns relating to the impact of SEVs on the lives of women and girls of Cheltenham (both women working in the sex trade and women and girls in the wider community). These issues should be considered as part of Cheltenham Borough Council's Public Sector Equality Duty, in deciding the outcome of this application.

Having attended and contributed to the licensing committee meetings for the preceding two sexual entertainment venue licence applications, we do not believe the licensing committee have adequately considered these issues.

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

**About GlosWomen**

GlosWomen is a women's liberation collective, bringing together women from all over the county of Gloucestershire, who share a vision of a world where women and girls can live free from male violence and all manifestations of misogyny. We aim to bring about change through activism, discussion and raising the voices of women and girls.

Please also see 2 previous objection (pdfs) letters: [GlosWomen objection to Nov SEV application & Letter of objection - SEV license variation Sep 23](#)

11.

Please register my objection to the latest application for sexual entertainment in Cheltenham. Ref 23/01946/SEXR



I believe that this application is for a venue outside the designated area. I oppose the objectification of women at any venue; however, it is concerning that this is in an area which has been deemed unsuitable for this kind of entertainment. I therefore hope that the application will be turned down.

### 12. On behalf of GRASAC

#### **Licence 23/01277/SEXA**

I wish to register GRASAC's objection to the renewal of the above licence in relation to *Under the Prom* as a sexual entertainment venue. I am in no doubt that this licence will be granted by the Cheltenham Borough Council, as there is no variation other than the dates moving forward, and recent, new applications for other venues have been approved.

Sexual violence is a serious and widespread issue and disproportionately targeted at women and girls. Nationally, 97% of women aged 18-24 have experienced some form of harassment in public spaces<sup>1</sup>. This is also a local issue recognised by Gloucestershire's Police and Crime Commissioner (Chris Nelson) who recognises that women and girls often feel unsafe in their communities, feeling the need to make decisions about their movements and day-to-day activities based on their desire to increase their personal safety, hence his stated commitment to 'tackling all forms of violence and intimidation that women experience, whether it's catcalling, harassment, rape or domestic abuse' [Glos PCC]

The objection to these licences being granted is not so much in relation to any harm potentially caused to the women working in the venue(s), but the growing evidence that SEVs impact on all women, through increased harassment and fear of violence in the vicinity of the clubs. Research in London boroughs reported an increase in reported rapes in the vicinity of such clubs. Women elsewhere in the UK reported areas around lap dancing bars becoming no-go areas for women for fear of harassment, anti-social behaviour or targeted violence by male customers of SEVs.<sup>2</sup>

Additional research reports the extent to which women increasingly experience sexual violence and harassment on a day to day basis: granting licenses to sexual entertainment venues is unjustifiable, and contravenes local authorities' duties under the Equality Act 2010<sup>3</sup>.

This page is intentionally left blank

Thursday, December 21, 2023 10:22 PM

Dear Members of the Licensing Committee,

The Nelson Trust is writing to emphatically oppose the license renewal application of Under the Prom's Sexual Entertainment Venue License for the March 2024 race week and November 2024 race meets submitted by Eroticats. The Nelson Trust objection to Sexual Entertainment Venues remains steadfast and is rooted in profound concerns over sex equality. The strong opposition echoed in the October 4, and November 18 Licensing Committee meetings by numerous groups, local residents and Alex Chalk, MP, only reinforces the community's collective stance against the normalisation of SEVs. Our line of reasoning has not changed and as such we submit our previous objection below.

We believe that where Sexual Entertainment Venues (SEVs) operate there are always multiple harms that cannot be mitigated. Our objection to this application is based on years of frontline professional experience supporting women involved in the sex trade.

The Nelson Trust is a gender-responsive and trauma-informed organisation that works with women involved in the sex trade in Gloucestershire to help address their complex and multiple needs. There are strong links between lap dancing and selling sex, with a UK Home Office report finding that the majority of lap dancers also sell sex. The longer a woman has been stripping, the more likely it is she will be selling sex ([Prostitution and Sex Work Report.pdf](#)). Other research studies also indicate that alcohol and drug abuse is standard in the lap dancing industry, if not integral to the job ([The occupational milieu of the nude dancer: Deviant Behavior: Vol 18, No 2 \(tandfonline.com\)](#)), both by dancers and punters. This places women both in and outside of SEVs at even more risk of assault. Research also indicates considerable use of Class A drugs, initiated after entering the trade.

This published evidence supports our experience on the ground; most women we support have been through adverse childhood experiences, have been involved in domestic abuse relationships and often use drugs and alcohol as a coping mechanism. Women often are unable to realise the harms of the sex trade until they are out of it. One of the women we supported to exit wrote her story in her own words, and here is an extract of how someone might end up involved in the sex trade: *'I was forced into selling sex at the age of 17 and it then became a choice I made with an addict's insane mind that I could fund my habit selling my body. But what I didn't realise is that I was not just selling my body, but I was selling a part of my soul each time I did this. And chipping away at my self-worth, my self-esteem and slowly but surely losing any empowerment as a woman I had or could have.'* This woman's story is not uncommon, and it is a voice that does not often get heard, as many women do not have access to support to address their unmet needs and increase their life choices, including the opportunity to exit the sex trade.

The CBC's responsibility to foster good relationships between men and women, in accordance with their Public Sector Equality Duty seems to conflict with the granting of new and/or variation of licenses for SEVs.

After carefully considering the published evidence, the CBC's legal responsibilities, our professional experience, and the voices of women who have exited, The Nelson Trust vehemently opposes the granting of SEV licenses and/or variations to licenses as we believe they are incompatible with women's rights, safety & equality. CBC has an opportunity to show leadership and enforce their Public Sector Equality Duty by rejecting this licence renewal application.

We stand with GRASAC, Alex Chalk, MP, and many local people who are object to Sexual Entertainment Venues in our communities. We urge the committee to contribute actively to the council's pledge for women's safety and use its influence and the legal means available to it to close the frequency exemption permitted under UK law. This move would align with the community's aspiration for a safer, more equitable environment.

With kind regards,  
The Nelson Trust

Dear Licensing Team

10 September 2023

**SEV Licence Variation - ref: 23/01277/SEXA**

We are writing on behalf of our members to object to the application submitted by European Events Consultants Limited to vary their existing SEV licence, to allow for lap dancing at Under the Prom during the autumn race meetings.

**Impact on the lives of women and girls**

As previous objections to SEV licences have pointed out, lap dancing clubs, where women are sexually objectified and the idea that men are entitled to access women's bodies is reinforced, contribute to harmful sexist and misogynistic attitudes that underpin the endemic abuse, harassment and violence against women and girls in society.

There are a number of research studies, as well as research carried out by the United Nations and our own government, that show the link between these harmful attitudes, a culture that perpetuates and reinforces these messages and the perpetration of sexual violence. Please see the following report, for details of this research 'Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review' 2021.

(<https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>)

Cheltenham Borough Council's (CBC) own research from 2021 ('Safety of women in the evening and at night-time survey 2021') revealed the impact of sexual harassment on the lives of women and girls. From a sample of 638 responses:

- 75% of respondents said that they do not feel safe during race week;
- 30% of respondents said that they get regularly sexually harassed
- Women said that they do not want to be blamed or asked to change their behaviours, instead they want to see a culture created where sexual harassment is unacceptable.

Our own research into the experiences of women and girls during Race Week, found that:

- 78% of respondents said that they do not feel safe in Cheltenham during race week;
- 84% of respondents said that they change what they usually do in Cheltenham during race week, with many avoiding the town centre;
- 53% of respondents said that they had experienced sexual comments or noises during race week;

Women told us of routine harassment from drunk men, their experiences of fear and powerlessness and feeling 'like an object just for men's amusement'. Others complained about

the SEVs stating that, 'Turning the pubs into strip clubs again only reinforces objectifying women' and 'The SEVs make the atmosphere really unpleasant and unsafe for women.'

A culture where sexual harassment is unacceptable cannot be created when CBC enables the continued sexual objectification and dehumanisation of women and girls through the grant of SEV licences.

Following the results of the 'Safety of women in the evening and night-time survey', CBC promised that they would develop a 'pledge for women's safety'. However, we do not believe there has been any significant progress on this.

Instead, CBC have continued to grant SEV licences, stating that if they don't, lap dancing will happen anyway (using the legal loophole), without the scrutiny that the licensing framework imposes. Could CBC provide evidence that sexual entertainment goes underground if SEV licences are not granted? If this evidence exists, why aren't CBC working to reduce demand for sexual entertainment and lobbying central government to close the legal loophole that we are told is so influential in CBC's decision making each year? Why aren't CBC considering other solutions, such as making a prohibition on hosting sexual entertainment a condition of alcohol licensing?

Concerns about the negative impact on women and girls of entrenching the sex trade in Cheltenham have been waved away by the licensing committee and described as 'moral objections'. The effect of this is the silencing of women and girls. We are denied the opportunity to actively participate in local democracy and decision making and CBC send a very loud and clear message that women and girls do not matter and CBC does not support equality between the sexes.

The group of women who must not be forgotten, are the women performing in the lap dancing clubs. Whilst some may freely choose to participate in this trade, we know that many others do not have complete freedom in their choices. Poverty and insecure immigration status are undoubtedly factors that drive many women into the sex trade. Many others may be coerced into such work. The impact of working in an environment where sexual objectification and women's dehumanisation are deeply entrenched, should not be underestimated. We implore CBC to engage with the research on why many women begin to work in the sex industry, the very significant and often traumatic impact it has on their lives and links between sexual entertainment and abuse through prostitution. Links to a number of useful reports can be found in the 'Safe and Equal Bristol Report: Sexual Entertainment Venue Policy Review' 2021. (<https://www.bristolwomensvoice.org.uk/wp-content/uploads/2021/11/SEVReport2021FINAL.pdf>)

**Purple Flag Scheme**

Given the results of CBC's and our own research into women's safety at night, we find it surprising that Cheltenham retains accreditation under the Purple Flag Scheme. The core standards of the scheme state that destinations should be 'safe and welcoming' and that leisure and entertainment should be for a 'diversity of ages, groups, lifestyles and cultures'. Can CBC not see that endorsing the sex trade by continuing to grant SEVs, thereby creating a hostile environment for women and girls, is incompatible with these standards?

### **Public Sector Equality Duty**

CBC may be aware that the High Court has recently ruled, in *The King (on the application of) CDE v Bournemouth, Christchurch and Poole (BCP) Councils*, that Bournemouth, Christchurch and Poole Councils' policy of having no limit on the number of SEVs was unlawful. The Court found that the Council was wrong to ignore concerns that strip clubs contribute to the abuse, harassment and violence towards women and girls in society. Just as CBC does repeatedly, the concerns of women and girls in Bournemouth, Christchurch and Poole were dismissed as 'moral objections'.

The Court also found that the Council's equalities assessments failed to sufficiently consider the need to tackle discrimination against women or the requirement for public bodies to have due regard to 'foster good relations between men and women', in accordance with their Public Sector Equality Duty.

Where is the evidence that CBC are working towards eliminating discrimination and harassment of women, advancing equality of opportunity for women, as well as fostering good relations between men and women, in accordance with their Public Sector Equality Duty? How is the granting of SEV licences compatible with these obligations?

We hope that CBC will listen to the voices of women and girls and finally show a commitment to their Public Sector Equality Duty and refuse this variation licence application.

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

### **About GlosWomen**

GlosWomen is a women's liberation collective, bringing together women from all over the county of Gloucestershire, who share a vision of a world where women and girls can live free from male violence and all manifestations of misogyny. We aim to bring about change through activism, discussion and raising the voices of women and girls.







## Public Sector Equality Duty

We were encouraged by the discussion of the Public Sector Equality Duty during the Committee Meeting of 4 October 2023. Councillors asked questions about discrimination or inequality specifically relating to the applicant and the venue. There was also discussion about taking a 'gender neutral' approach in terms of the application of SEV policy and consideration of the protected characteristic of disability.

Unfortunately, what councillors failed to do was engage with the wider issues of an industry where women are sexually objectified and the idea that men are entitled to access women's bodies is reinforced.

As equality law expert Karon Monaghan KC put it to the Women and Equalities Committee in 2018, Sexual Entertainment 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...How are we [licensing SEVs] 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."*

We were told that there was no evidence in Cheltenham of a link between the lap dancing club and harassment and violence towards women and girls. But research clearly tells us that there is a link between sexist and misogynistic attitudes, a culture that perpetuates and reinforces these messages and the perpetration of sexual violence. Lap dancing contributes to a culture that reinforces sexist and misogynistic attitudes.

- A study for The Journal of Sex Research found that more than half of the men interviewed visited strip clubs to escape social conventions and rules that required them to treat women as equals. One contributor commented that, *"With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want."*<sup>1</sup>
- A review for the Government Equalities Office in 2020, found that there was strong evidence of a link between the sexual objectification of women and harmful sexual attitudes and behaviours towards women.<sup>2</sup>
- A 2011 research study of women who perform in lap dancing clubs found that over half of participants reported frequent incidents of sexual assault.<sup>3</sup>

---

<sup>1</sup> 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

<sup>2</sup> GEO (2020). The Relationship Between Pornography Use and Harmful Sexual Behaviours: Literature Review.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/952526/The\\_Relationship\\_between\\_Pornography\\_use\\_and\\_Harmful\\_Sexual\\_Attitudes\\_and\\_Behaviours-\\_literature\\_review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/952526/The_Relationship_between_Pornography_use_and_Harmful_Sexual_Attitudes_and_Behaviours-_literature_review.pdf)

<sup>3</sup>Sanders, T., & Campbell, R. (2012). The Regulatory Dance: Sexual Consumption in the Night Time Economy – Briefing for Licensing Practitioners. University of Leeds.

Dear Licensing Team

Date: 10 November 2023

## **SEV Licence Application - 23/01596/SEXA**

We are writing on behalf of our members to object to the application submitted by Red Apple Associates Limited to allow for lap dancing at Jessop House, 30 Cambray Place, Cheltenham to coincide with race meets at Cheltenham Racecourse. We are disappointed but not at all surprised that the applicant has submitted an application for year round lap dancing.

We refer to our letter of objection dated 10 September 2023 which details our concerns relating to the impact on the lives of women and girls of Cheltenham (both women working in the sex trade and women and girls in the wider community), which we believe should be considered as part of Cheltenham Borough Council's Public Sector Equality Duty in deciding the outcome of this application.

Lap dancing clubs - where women are sexually objectified and the idea that men are entitled to access women's bodies is reinforced - contribute to harmful sexist and misogynistic attitudes that underpin the endemic abuse, harassment and violence against women and girls in society.

We attach the full results of GlosWomen's Race Week survey (Please see '**Appendix**'). As mentioned previously, women reported feeling unsafe in Cheltenham during Race Week and a number of respondents felt that the presence of lap dancing reinforced the sexual objectification of women and girls.

### **Sex equality concerns not 'moral objections'**

GlosWomen, along with a number of other objectors, attended and contributed to the Licensing Committee Meeting on 4 October 2023, where a variation of an existing licence at Under the Prom was granted to allow for lap dancing to take place during the November race meet.

We were pleased that objections made on the basis of sex equality concerns were not dismissed by the Licensing Committee as 'moral objections', as has been the case previously. We hope this change in approach will allow for more detailed consideration of the impact of the sex trade on women and girls and how this contributes to sexist and misogynistic attitudes that drive male violence against women and girls in society.

It was also positive to hear of the new survey launched by the Cheltenham Community Safety Partnership to understand how safe women feel in the evening and at night in the town centre, as well as a commitment to consult with local women on the proposed Pledge for Women's Safety.

- A 2013 United Nations study found that for men who admitted subjecting women to rape, the most frequently cited motivation was a belief in their entitlement to sex.<sup>4</sup>

Councillors must also consider the fact that the majority of sexual harassment and violence is not reported by women and girls. We live in a culture that normalises such abuse, blames women for the violence they are subjected to and, if women do report, a criminal justice system that routinely fails and re-traumatises them.

Our research showed that over half of the women and girls surveyed had experienced sexual comments or noises, such as catcalling or wolf whistling during Race Week, while a third experienced unwanted physical contact of a sexual nature, such as kissing, brushing up against someone.

Councillors have previously heard evidence from the Cheltenham Guardians of the numerous interventions that they have to make during Race Week, to prevent women from being cornered by men.

The Licensing Committee will also no doubt be aware of recent press coverage of Cheltenham Race Week in The Sun and The Daily Star, where a male patron enthusiastically described the lap dancing club and women working there as “three floors of wh\*\*\*s”. This is derogatory and misogynistic language and an example of the attitudes reinforced by lap dancing.

### **Supply and demand**

It seems clear from the pattern of Sexual Entertainment Venue licence applications (which always coincide with race meets) that lap dancing only becomes viable at times when racegoers, with cash to spend, arrive in town. Even then, it seems that significant effort is needed to drum up business. The applicant always requests variations to the SEV policy standard conditions to allow for leafleting, the running of a minibus (to advertise and transport patrons) and to extend operating hours.

By granting a licence for year round lap dancing, particularly on terms that allow for extended operating hours and advertising and solicitation, Cheltenham Borough Council (CBC) are complicit in creating demand for lap dancing, which contributes to a culture that reinforces sexist and misogynistic attitudes towards women.

We are often told that CBC’s hands are tied in respect of the grant of Sexual Entertainment Venue licences because it is a legal activity and due to the existence of the frequency exemption. However, CBC’s own Sexual Entertainment Policy allows for a nil cap for SEV licences.

---

4

<http://www.unwomen.org/en/news/stories/2013/9/half-of-men-report-using-violence-and-a-quarter-perpetrate-rape-according-to-un-survey>

In respect of the frequency exemption, the relevant legislation does allow for these provisions to be repealed and we would hope that CBC will use whatever influence it may have to call for such a change.

We hope that the Licensing Committee will show their commitment to ending the sexual objectification and commodification of women by refusing this application.

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

**About GlosWomen**

GlosWomen is a women's liberation collective, bringing together women from all over the county of Gloucestershire, who share a vision of a world where women and girls can live free from male violence and all manifestations of misogyny. We aim to bring about change through activism, discussion and raising the voices of women and girls.



**Appendix - GlosWomen's Race Week Survey**

Please see separate PDF attachment

This page is intentionally left blank

Dear Licensing Team

Date: 24 December 2023

**SEV Licence Application - 23/01946/SEXA**

We are writing on behalf of our members to object to the application submitted by European Events Consultants Limited to allow for lap dancing at Under the Prom, 109-113 Promenade, Cheltenham to coincide with race meets at Cheltenham Racecourse during November and Cheltenham Festival Week in March.

We refer to our letters of objection dated 10 September 2023 and 10 November 2023 (copies of which are attached) which detail our concerns relating to the impact of SEVs on the lives of women and girls of Cheltenham (both women working in the sex trade and women and girls in the wider community). These issues should be considered as part of Cheltenham Borough Council's Public Sector Equality Duty, in deciding the outcome of this application.

Having attended and contributed to the licensing committee meetings for the preceding two sexual entertainment venue licence applications, we do not believe the licensing committee have adequately considered these issues.

Yours faithfully

Gloucestershire Women's Liberation Collective (GlosWomen)

**About GlosWomen**

GlosWomen is a women's liberation collective, bringing together women from all over the county of Gloucestershire, who share a vision of a world where women and girls can live free from male violence and all manifestations of misogyny. We aim to bring about change through activism, discussion and raising the voices of women and girls.



This page is intentionally left blank



# License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres

Jackie Patiniotis and Kay Standing consider how the effects of lap dancing clubs contribute to women's vulnerability in public spaces

*A growing body of evidence looks at violence and harm caused to women working in lap dancing clubs. However, little attention has been paid to the wider impact of the licensing of sex entertainment venues (SEVs) on women's sense of safety and well-being in city centres where they are concentrated. This article contributes to the debate around the licensing of lap dancing clubs and gendered harm, using testimonies from a participatory photography research project facilitated by Sara Parker. Findings support feminist arguments that women's sense of safety and wellbeing in public spaces is compromised by the widespread use of sexualised imagery of women and girls in public spaces and by the growth of SEVs such as lap dancing clubs.*

## Licensing lap dancing clubs and gendered public space

The *Policing and Crime Act 2009* reclassified lap dancing clubs as 'sex entertainment venues' and allowed local authorities in England and Wales to have greater control over the licensing of clubs. These powers are not mandatory, and only apply where they are adopted by local councils. Whilst some have yet to consult, or have decided not to adopt a licensing policy, the majority of local authorities have chosen to adopt a licensing regime, resulting in a small number of councils imposing a 'nil policy', and a much

larger number choosing to grant licences with conditions attached. This localisation of licensing policy has led to an uneven spread of lap dancing clubs nationally, with a greater concentration of SEVs in some cities, leading to a promotion of a gendered night time economy in some areas and making some public spaces effectively 'no go' areas for women. The Royal Town Planning Institute (2007) recognises that 'in certain locations, lap dancing and exotic dancing clubs make women feel threatened and uncomfortable', however there is little evidence that the licensing of SEVs takes this aspect of gendered harm into account.

Whilst the focus has been on the harm caused to women working in clubs, there is evidence of the gendered harm caused by SEVs to women in general. Research undertaken by the Lileth Project on lap dancing in three London boroughs found a 50 per cent increase in reported rapes in the vicinity of the clubs, and also an increase in less measurable effects on women such as harassment and

fear of violence (Eden, 2007). Research has demonstrated that fear of assault and the consequent creation of no go areas for women relate directly to the activities of male customers of lap dancing clubs, and anti-social behaviours associated with the freeing up of the night-time economy (Higginson, 2012).

## 'We object': Feminist participatory action research

The aim of the research was to give women a means of 'speaking out' about issues relating to empowerment through the method of photography. Participants were members of a community based women's group in a city in the North West of England with a high concentration of SEVs in the city centre. The women were given cameras and took photographs of public spaces where they felt empowered or disempowered. They focused on the way sexualised images of women and sex

*localisation of licensing policy has led to a promotion of a gendered night time economy in some areas and making some public spaces effectively 'no go' areas for women*

entertainment impact on women's feelings of disempowerment, safety and value as gendered citizens. The photographs and accompanying comments support arguments that lap dancing clubs normalise the objectification of women,

undermine efforts to promote gender equality, and contribute to a climate in which violence against women and girls is legitimated through the stereotyping of women and girls as sexual objects available to meet male 'need' and 'entitlement' (End Violence Against Women, 2011).

## Continuum of sexual violence

The findings support Liz Kelly's concept of a 'continuum of sexual violence' as a way of 'linking [the] more common everyday abuses women experience with less common experiences labelled as crimes' (Kelly, 1988). Rather



walking down this street. I used to feel sorry for the women who were coming to work as I left for home.

However, women also reported avoiding certain streets and feeling frightened in the day time, when the clubs

to walk past the sniggering schoolboys who are laughing at the pornographic posters.

Attitudes and behaviours that in any other workplace or public environment would be considered to be sexual harassment and gender discrimination, are legitimised in clubs and are then carried into public space, creating 'no go' areas as women seek to minimise known and unknown risks to their safety and wellbeing.

Lap dancing clubs are places to which men go to affirm their sense of power and gender entitlement; notions which are rooted in traditional perceptions of masculinity, power and control (Banyard, 2010).

*The boom in lap-dancing clubs and the sexual objectification of the dancers has nothing to do with 'desire' but everything to do with the preservation and reproduction of male power relations.*  
(Higginson, 2012)

The feelings of disempowerment expressed by all the women in the research therefore connect to tangible manifestations of gender inequality. If one half of the population is consistently objectified by the media and by the mainstreaming into our city centres of the sex industry, this must convey certain ideas about women having lesser social value than men (Banyard, 2010).

than focusing on different forms of violence and abuse as discrete issues, this continuum recognises commonalities between them as forms of violence against women which underpin male power and control. Thus, 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.

are closed. It is the existence of the clubs that causes women to feel alienated in public space at all times, and fearful of the threat of violence posed by the sexual objectification of women on display outside the clubs and acted out within them.

Women's avoidance tactics include crossing the street so as not to walk past a SEV, avoiding certain streets altogether, and no longer using bus stops that are situated near lap dancing clubs, as their vicinity makes them feel vulnerable and unsafe. Women also reported being harassed by men at bus stops, or of being harassed as passengers on a bus by men alighting at a bus stop, and women have reported an increase in this type of behaviour in areas where there are SEVs.

*I feel disempowered, afraid and embarrassed when I pass this bus stop, as it is next to a lap dancing club. It's horrible having*

*I avoid this street at night. I feel disempowered and angry and violated when I walk down this street, as there is a lap dancing club on it. The closer I get to that awful venue, the worse I feel. I feel some relief after I've passed it. It's worse when there are men around.*

*I feel embarrassed and uncomfortable as a woman*

## National and international equality legislation

All local authorities have a legal obligation under the *Public Sector Duty of the Equality Act 2010* to eliminate unlawful gender discrimination and harassment and to promote equality of opportunity between women and men. Article 1 of the Convention on the Elimination of Discrimination Against Women (CEDAW) states that discrimination against women means:

*any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.*

The findings of the project indicate that the normalcy of the sex industry into public and commercial spaces causes harm to women's sense of safety and wellbeing and denies women their fundamental freedoms to access social, cultural and civic space.

The obvious presence of the sex and porn industries into our city centres has a negative impact on women's sense of self esteem, their value as citizens, and their safety. These are issues of discrimination and inequality which local authorities must consider when granting licences to SEVs. As the Fawcett Society (2012) argues, the appropriate number of lap dancing clubs in any area where women and men are valued equally and where gendered violence is not tolerated is zero, the granting of any licence to SEVs is therefore a licence to cause gendered harm. ■


We wish to acknowledge and honour the courage and commitment of the women who took part in this participatory action research. All are survivors of gender based abuse, and took part in the research as a means of objecting to women being portrayed and exploited as sexual objects, which makes them feel more vulnerable to harassment and violence, and which causes them to feel restricted in their use of public space.

The photography project was undertaken as a piece of feminist action research by members of the Joint Forum Women's Group in partnership with Liverpool John Moores University and was facilitated by Dr Sara Parker. Photographs were taken before the current licensing rules came into place.

**Jackie Patiniotis** is a freelance researcher and former development worker at the Joint Forum Women's Group. **Kay Standing** is a Lecturer in Sociology, School of Humanities and Social Science, Liverpool John Moores University. Photographs for this article are supplied by Joint Forum/Liverpool John Moores University

## References

- Banyard, K. (2010), *The Equality Illusion: The truth about women and men today*, London: Faber and Faber.
- Eden, I. (2007), *Inappropriate Behaviour: Adult venues and licensing in London*, London: The Lilit Project, Eaves Housing for Women.
- End Violence Against Women (2011), *A Different World is Possible: A call for long-term and targeted action to prevent violence against women and girls*, London: End Violence Against Women Coalition.
- The Fawcett Society (2012), *Bristol Fawcett's campaign against the proliferation of lap dancing clubs and the normalisation of the sex industry*, Bristol: The Fawcett Society, [www.bristolfawcett.org.uk/Lapdancing.html](http://www.bristolfawcett.org.uk/Lapdancing.html)
- Higginson, S. (2012), 'Liverpool After Dark: The retail "gaze", sexism and misogyny in the party city', paper given at The Centre for the Study of Crime, Criminalisation and Social Exclusion Critical Research Seminar Series, Liverpool John Moores University.
- Kelly, L. (1988), 'The Continuum of sexual violence', in Hanmer, J. and Maynard, M. (eds.), *Women, Violence and Social Control*, London: Palgrave Macmillan, pp. 46-60.
- Royal Town Planning Institute (2007), *Gender and Spatial Planning*, RTPi Good Practice Note 7, London: Royal Town Planning Institute.



**Study Criminology and Criminal Justice**

Gain a prestigious University of London law qualification, through evening study, at Birkbeck. As a Birkbeck Law student you will be taught by research active staff who recognise the needs of part-time learners, right in the heart of London.

We have the following programmes available in 2012/13.

**Certificate of Higher Education in Criminology (Normally 2 years part-time)**

This course focuses on the causes of crime and the response from the criminal justice system. Students do not need to have a previous academic qualification and may choose to undertake the entire award or undertake individual modules from the programme.

**BSc in Criminology and Criminal Justice (4 years part-time or 3 years full-time)**

An exciting new degree which explores the worlds of prisons, courts, probation and the police, as well as grappling with broader social questions about order, regulation, surveillance and control. It will give you with the skills to understand and assess the dilemmas of crime and justice in contemporary society and provide a critical approach to the subject matter.

**LLM/MA Criminal Law and Criminal Justice (2 years part-time or 1 year full-time)**

This course offers an opportunity explore the interface between criminal law and criminal justice. It is a theoretically informed course with a strong humanities focus, designed for those with some background in criminal law or criminal justice as well as those interested in exploring critical perspectives on contemporary debates.

**For more information email [law@bbk.ac.uk](mailto:law@bbk.ac.uk)**

**020 7631 6508**

**[www.bbk.ac.uk/law](http://www.bbk.ac.uk/law)**

**London's evening university**

This page is intentionally left blank

### **FACT SHEET ON LAP DANCING: Why strong regulation is needed**

#### **FACT ONE: Lap dancing clubs form part of the sex industry, not the leisure industry**

Any industry that markets women as sexual objects and which promotes working practices that implicitly encourage men to expect and seek sexual services is part of the sex industry, not the leisure industry. These working practices include a requirement that women pay rent to work and a high performer to customer ratio which leads to intense competition between performers to gain the attention of male customers. It is within this context that women report feeling pressured to provide extra sexual services in private booths in order to earn a wage.

**"The fact is that if you break the rules, you make more money. If one dancer starts breaking the rules then the pressure is on others to do the same. Otherwise a bloke would think, Well, that dancer charged me £20 and stayed three feet away, but that one charged me just the same and she put her breasts in my mouth and sat on my crotch. Once you've been there a while, you learn that certain things are profitable, and no contact is the first rule you learn to break. Eventually you start to wonder, what is the difference between me and a prostitute?"**

**'Elena' quoted in 'I was an Object, not a Person, The Guardian 19.03.08**

The fact that lap dancing clubs form part of the sex industry is now also recognised in law. The **Policing and Crime Act 2009** allows local councils to license lap dancing clubs as Sexual Entertainment Venues – venues which provide visual entertainment for the purpose of sexual stimulation. This is crucial in order to regulate the expansion of the sex industry.

#### **FACT TWO: Lap dancing clubs promote 'sex-object' culture – the mainstreaming of the sex and porn industries**

The growth of lap dancing clubs has fed **Page 46** OBJECT terms 'sex-object' culture – the mainstreaming of the sex and porn industries and the ever increasing sexual objectification of women and girls. With lax licensing laws leading to the number of lap dancing clubs doubling over the last five years, and a PR makeover branding lap dancing as glamorous and 'harmless fun', we have found ourselves in a situation in which major retailers sell pole dancing kits along with pink frilly garters and paper money in their 'toys and games section'<sup>1</sup>, and leisure centres offer pole dancing lessons to girls as young as twelve<sup>2</sup>. This has led to 25% of teenage girls seeing being a lap dancer as their *ideal* profession<sup>3</sup>.

**FACT THREE: Lap dancing clubs are linked to wider systems of prostitution**

As well as the structural conditions in lap dancing clubs which pressure many performers into offering extra sexual services, research further shows that, even if clubs do enforce a no touching rule, and even if there is no sexual contact between dancers and customers, **the presence of strip clubs in a locality increases demand for nearby prostitution services**<sup>4</sup>.

This places lap dancing on a continuum of commercial sexual activity, irrespective of whether the sexual exchange occurs within the club itself.

**FACT FOUR: Lap dancing clubs create 'no-go' zones for women in the local vicinity**

Research undertaken in the London Borough of Camden found a fifty percent **increase in sexual assaults** in the borough after the rapid expansion of lap dancing clubs<sup>5</sup>. Personal testimony reinforces the idea of a link between the expansion of lap dancing clubs and increased levels of sexual harassment for women in the vicinity:

<sup>1</sup> Eden, I. (2007) *Inappropriate Behaviour: Adult Venues and Licensing in London*, London: The Lilith Project, Eaves Housing for Women.

<sup>2</sup> BBC News Online (2006), 'Children are Taught Pole Dancing' Tuesday, 12 December 2006, url: <http://news.bbc.co.uk/1/hi/england/tyne/6173805.stm>

<sup>3</sup>[http://www.manchestereveningnews.co.uk/news/s/161/161338\\_naked\\_ambition\\_rubs\\_off\\_on\\_teen\\_girls.html](http://www.manchestereveningnews.co.uk/news/s/161/161338_naked_ambition_rubs_off_on_teen_girls.html)

<sup>4</sup> Coy, M, Horvath, M & Kelly, L (2007) *It's just like going to the supermarket: Men talk about buying sex in East London* London: Child and Woman Abuse Studies Unit

<sup>5</sup> Eden, I. (2003) *Lilith Report on Lap Dancing and Striptease in the Borough of Camden*, London: The Lilith Project, Eaves Housing for Women

**“Once I walked past [a local strip club] at closing time, when a stripper tried to discreetly leave the premises and a group of punters stood outside. On recognising her, they erupted into loud whooping and jeering as she ran across the road to get away. I found this behaviour completely intimidating and totally in keeping with the behaviour of the street sexual harassment that makes women feel uncomfortable on a daily basis... Punters are encouraged to engage the very attitudes and behaviour which are seen as disrespectful and intimidating to women outside strip clubs... It is vital that councils take this into account when considering applications, so that they can take appropriate measures to limit the normalisation, exploitation and legitimisation of sexism, in order that women feel safe and entitled to walk their streets without fear of harassment or abuse”.**

Sonia, resident who objected to a lap dancing club in Hackney.

Furthermore, a recent six-month review<sup>6</sup> into the licensing of strip clubs in the **London Borough of Tower Hamlets**, which received the highest number of contributions in recent years for a public consultation, stated:

**Many people referred to the impact they felt the venues [strip clubs] were having on the character of the borough, with the following excerpts just a few examples: “my family feel uneasy in walking around streets where strip clubs are based, especially female members”; “I have been leered at and felt intimidated when walking past these clubs”.**

In addition, the **UK Royal Institute of Town Planning** issued a Good Practice Note in December 2007 on the issue of lap dancing clubs and women’s sense of safety<sup>7</sup>:

**“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 clubs make women feel threatened or uncomfortable”**

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

<sup>6</sup> London Borough of Tower Hamlets (2008) *Licensing of Strip Clubs*:

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

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

**FACT FIVE: Lap dancing clubs have a negative impact on women’s safety in wider society**

Lap dancing clubs normalise the representation of women as sexual objects who are always sexually available. They make sexual harassment seem normal, as what takes place within the four walls of a lap dancing club would be considered harassment in any other context.

The links between objectification, discrimination and violence against women are recognised at the international level by the legally binding **United Nations Convention to Eliminate Discrimination Against Women (CEDAW)**, which has repeatedly called on states – including the British Government - to take action against the objectification of women<sup>8</sup>.

Similarly the UK-based **End Violence Against Women coalition** has called on the UK Government to tackle the sexualisation of women and girls because it provides a ‘conducive context’ for violence against women<sup>9</sup>.

The links between the expansion of lap dancing clubs and an increase in the levels of sexual violence in society was raised by **Glasgow City Council**<sup>10</sup> in response to research it commissioned into the impact of lap dancing clubs on the city:

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

<sup>8</sup> 1979 Convention on All Forms of Discrimination Against Women (CEDAW) Article 5

<sup>9</sup> Realising Rights, Fulfilling Obligations: An Integrated Strategy to End Violence Against Women (EVAW) 2008

<sup>10</sup> Glasgow City Council report on the need for review of licensing legislation in the light of concerns re table dancing  
<http://www.glasgow.gov.uk/NR/rdonlyres/OD19236F-808A-4467-96F7-6A9508C1F312/0/legtablic2.pdf>



**FACT SIX: Lap dancing clubs run counter to efforts to promote equality between women and men**

The **Gender Equality Duty 2007** requires local councils to assess the gendered impact that lap dancing clubs have on society as a whole.

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

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

The more it becomes acceptable to view and treat women as sexual objects, the easier it becomes to disrespect women as a group. As stated by Chris Green, Director of the **White Ribbon Campaign**<sup>11</sup>:

**"Any expansion of lap dancing clubs feeds an increase in the lack of respect for women"**

Research into male motivations for visiting strip clubs found that men went to strip clubs to meet women who were not 'feminist' and who were willing to act in more 'traditional' ways<sup>12</sup>. This is reflected by **testimonies from former lap dancers**<sup>13</sup>:

**"I learned that the best way to encourage a man to want you to dance for him is to act coy, submissive, innocent and a bit stupid"**

**Male customers** also said that they wanted to 'let frustration out' at the ways in which they had been forced to monitor their behaviour towards women in the workplace<sup>14</sup>:

<sup>11</sup> The White Ribbon Campaign works with men to end violence against women

<sup>12</sup> Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

<sup>13</sup> See OBJECT website for more testimonies

<sup>14</sup> Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

**“With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want”**

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

Recent sex discrimination law suits against corporate use of lap dancing clubs, and **top business women in *The Economist*<sup>15</sup> blaming corporate strip club culture for the lack of female representation at high levels of business** demonstrate the negative impact that lap dancing clubs have on women's equality in wider society. According to a female business woman in the UK<sup>16</sup>:

**“Often client after-work meetings became visits to strip clubs and I knew senior guys who had told HR they wanted a new junior team member and that she must be slim, blond and pretty...one guy refused to work with me because he said my breasts were off-putting and management responded by asking me if I had done anything to provoke this”**

The *Sexism in the City* campaign spearheaded by the **Fawcett Society**, the UK's leading campaign for gender equality, further highlights the links between lap dancing and gender inequality as it calls on government and business to take steps to end commercial sexual exploitation, sexual objectification and sexual stereotypes as crucial measures to achieve equality between women and men in the work place<sup>17</sup>.

**FACT SEVEN: Regulating the expansion of lap dancing clubs is an issue of equality, not morality**

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

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

<sup>15</sup> Jeffreys, S. (2008b) 'The Sex Industry and Business Practice', Seminar: School of Business, Ballara University, 21 May 2008

<sup>16</sup> Kate, Former City of London worker, Sexism and the City Manifesto, Fawcett Society 2008

<sup>17</sup> <http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf>

Lap dancing clubs promote gender stereotypes and attitudes that say it is acceptable to treat women as sexual objects, rather than real people. They are linked to gender discrimination and sexual harassment in the workplace (as demonstrated by recent successes of sexual harassment cases in which use of lap dancing clubs has been recognised as linked to discrimination) as well as the creation of no go areas in the surrounding areas which reduce women's sense of security and entitlement to public space.

Highlighting these issues is not about morality, or 'having an issue with sex', it is about ensuring that local councils abide by their legal requirements to promote equality between women and men.

**FACT EIGHT: The Policing and Crime Act 2009 allows councils to set a limit of zero for Sexual Entertainment Venues. This means rejecting all licensing applications for lap dancing clubs.**

The **Policing and Crime Act 2009** allows local authorities to regulate lap dancing clubs by setting a limit on how many Sexual Entertainment Venues can be licensed in each ward – and therefore in the borough as a whole. The limit may be set at nil.

**It is specifically provided in the *Local Government Miscellaneous Provisions Act (LGMPA) 1982* that nil may be an appropriate limit for the number of sex establishments in a particular locality.**

All current lap dancing clubs must apply for a Sexual Entertainment Venue license in order to operate. Licenses last for a duration of one year.

A local authority is under no obligation to renew a license for a currently operating club under the Sexual Entertainment Venue licensing regime. If a local authority sets a 'nil policy'/ a limit of zero, this will automatically allow the council to reject all licensing applications for Sexual Entertainment Venues. This is an important part of the new licensing regime in relation to lap dancing clubs considering the negative impact that lap dancing clubs have on local communities and in particular on women's equality and women's safety (see above).

Indeed, **the introduction of a nil policy is currently being proposed by the London Boroughs of Hackney and Haringey**. In the view of Hackney council<sup>18</sup>:

**"...[Sexual Entertainment Venues] contradict and undermine [the Borough of Hackney's] stated aims and exacerbate the challenges it faces in bringing about positive, genuinely sustainable characterful and thriving neighbourhoods which support the need and principle of upskilling its population and closing the education gap across its communities."**

<sup>18</sup> Hackney Draft Sex Establishment Licensing Policy, 2010

And in Harringey, Councillor Nilgun Canver states<sup>19</sup>:

**"This new legislation allows us to stop lap dancing and pole dancing clubs from setting up in sensitive areas where they will cause concern. We consider this would apply to every ward and want this to be central to our policy. We are asking for comments from residents, to see if they support this stance."**

**FACT NINE: Introducing a 'nil' policy/zero limit for Sexual Entertainment Venues and therefore rejecting licensing applications for lap dancing clubs is fully compliant with the Human Rights Act**

Some lap dancing club operators have threatened to appeal against the rejection of a Sexual Entertainment Venue (SEV) licence on the grounds that it violates their human rights under the Human Rights Act 1998. The two rights they threaten to invoke are the *right to freedom of expression* and the *protection of property*.

It is extremely unlikely that such an appeal would be successful considering that it is within the law for councils to set nil policies (see FACT SEVEN)

Furthermore, the two rights specified above are qualified, they are not absolute.

**Philip Kolvin QC, Chairman of the Institute of Licensing, states<sup>20</sup>:**

**"Where a rational decision has been taken by the licensing authority in accordance with the principle of the statute, it is most unlikely that the decision will be held to have been a disproportionate interference with human rights."**

Indeed, before the Policing and Crime Bill became law – enabling local authorities to licence lap dancing clubs as Sexual Entertainment Venues under the LGMPA - the **Minister of the Crown** in charge of the Bill made a **written statement that the new law, including the provision to set nil policies, was compatible with the Human Rights Act 1998.**

Thus **the power of local authorities to set a nil policy for Sexual Entertainment Venue licenses has been validated in human rights terms.**

Rejecting a lap dancing club licence application – and/or setting a nil policy for lap dancing clubs – is therefore fully compliant with the Human Right Act 1998.

<sup>19</sup> [http://www.haringey.gov.uk/index/news\\_and\\_events/latest\\_news/lap\\_dancing\\_ban.htm](http://www.haringey.gov.uk/index/news_and_events/latest_news/lap_dancing_ban.htm)

<sup>20</sup> Kolvin, P. (2010) *Sex Licensing*, The Institute of Licensing, p82

**FACT TEN: The current coalition government supports moves to tackle businesses which promote the sexual objectification of women, including lap dancing clubs, as part of their work on violence against women**

The current **Home Secretary, Theresa May**, sent a powerful message to councils to take a bold stance against businesses which promote the sexual objectification of women when, in July 2010 at the Women's Aid Conference, she stated:

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

The **Conservative Violence Against Women and Girls Strategy for London** (2010 - 2013) explicitly refers to the links between lap dancing clubs, prostitution, trafficking and other forms of violence against women<sup>21</sup>.

The Conservative Mayor for London, **Boris Johnson**, further states his support for councils to take tough measures against the proliferation of lap dancing clubs:

**"The proliferation of lap dancing clubs and brothels may further legitimise violence against women and undermine efforts to prevent it... We will ensure that the safety issues presented by lap dancing clubs come under local authority and police scrutiny through JEM. The Mayor will work with local authorities to review the implementation of the new licensing regime under the Policing and Crime Act 2009 to ensure that London leads the way in regulating lap dancing clubs as sexual entertainment venues and giving local people the power to object to lap dancing clubs in their area. We will support boroughs in ensuring that the proliferation of lap dancing clubs is controlled. We will also champion any police operations that target lap dancing clubs to investigate any misconduct or criminal activity."**

And the Leader of the opposition, **Ed Miliband**, states his support for OBJECT and urges councils to adopt strong measures to tackle the growth of lap dancing clubs as part of tackling the attitudes and behaviours that underpin violence against women<sup>22</sup>:

<sup>21</sup> <http://www.london.gov.uk/sites/default/files/The%20Way%20Forward%20Final%20Strategy.pdf>

<sup>22</sup> Ed Miliband's response to the End Violence Against Women Coalition, September 2010, <http://www.endviolenceagainstwomen.org.uk/>

**"We need to think about how our culture treats women more generally. The vital work of organisations such as OBJECT has exposed the ease with which lap dancing clubs have sprung up. In government we took some steps to enforce stricter controls on these establishments, but we were too slow to recognise this problem and act on it. I have already pledged that I want local people to have more power to challenge the licences of these establishments."**

**There is cross-party support for tackling the growth of lap dancing clubs.**

**Councils across the country are adopting the SEV licensing laws and considering setting the limit at zero.**

**You too can be part of stemming the sexualisation of women and girls by taking a stand against the 'sex-object' culture that lap dancing clubs promote.**

**Take action now and help end commercial sexual exploitation for generations to come.**

To find out more email OBJECT at [anna@object.org.uk](mailto:anna@object.org.uk) or visit our website at:

**[object.org.uk](http://object.org.uk)**

***Still* Stripping the illusion**

***Still* Stripping the illusion**

***Still* Stripping the illusion**

**Strip Clubs are *still* incompatible with  
Women's Rights, Safety & Equality**

## About This Report

In 2008, pressure group, **OBJECT**, launched the '**Stripping the Illusion**' campaign. This successfully lobbied Parliament to ensure the law was changed to stop licensing strip clubs as 'leisure venues' and instead license them for what they are - part of the sex industry.

As a result, strip clubs in England and Wales have been licensed as 'Sexual Entertainment Venues', SEVs, for more than 10 years.

**Still Stripping the Illusion** is a report by Not Buying It. It shows how little has changed, despite legislation. The fact remains that where strip clubs operate there are always multiple harms and these harms cannot be mitigated.

## About Not Buying It

**Not Buying It** challenges the sexual exploitation of the porn and sex trade, working closely with survivors.

Our team includes individuals who were instrumental in ensuring an end to the licensing of strip clubs as 'leisure venues' and the introduction of SEV legislation. We have also been behind two successful high court challenges demonstrating councils breach equality law in their policy and licensing decisions around strip clubs. Hence, we are not only expert in the reality and harms of the strip industry but SEV legislation and equality law

For these reasons, we urge all councils to introduce a zero policy on all sex establishments, particularly for strip clubs – and ensure exit support for those already in the industry, both emotionally and practically.



# Inherent Harm



Lap dancing is *inherently* harmful:

**Being objectified and/or objectifying yourself** is harmful, *regardless of whether it is chosen*. Psychologists describe it as a form of insidious trauma<sup>1</sup>. Yet this is the very premise of strip clubs.

**Behaving sexually and exposing yourself for men in an exchange that is not based on mutual desire** is harmful. Doing this for men who have bought you to behave this way (often multiple times a night), for whom you have no desire/interest (and who might even repulse you) is psychologically damaging. Yet this too is the entire premise of strip clubs.

**Providing the 'girlfriend experience'** is equally part of the work. Women must sit with men, sometimes for hours on end, feigning interest and desire. **'You can never be your true self', 'it is all an act', 'having to .. hang on a punter's every word, act interested'**<sup>2,3</sup>. Many describe it as one of the hardest parts of the job, not least because they cannot dissociate.

**Emotional Rollercoaster.** Testimonies and research also indicate that lap dancers' initial feelings of 'empowerment' subside. Over time, 'loving stripping' can turn to disgust<sup>4</sup>. Even during the course of a shift, experiences can rapidly fluctuate from 'good' to 'bad'<sup>4</sup> making for a damaging roller coaster of emotions, particularly given that most dancers will be young - often teenagers at University living away from home for the first time.

## Multiple Mental Health Issues

An abundance of research and testimonies expose PTSD, addiction, extreme psychological distress, denial, 'higher loyalties' to the club, dissociation and split personalities<sup>5,6,7</sup> as common mental health issues associated with the industry. Indeed, lap dancers experience the same threats to their mental and physical wellbeing as women in street prostitution<sup>7</sup>.

## Multiple physical health issues<sup>7</sup>

Lap dancing gives rise to multiple physical health problems such as:

- Chronic back pain
- Leaky implants
- Eating disorders
- Skin disorders
- STIs

### More Information

- ▶ Lap Dancing Faq
- ▶ Video
- ▶ Mental & Physical Health

## Substance Abuse

**Research.** Studies indicate that alcohol and drug abuse is standard in the industry, if not integral to the job<sup>8</sup> - both by dancers and punters. This places women both in and outside of strip clubs at even more risk of assault. Research indicates considerable use of Class A drugs, initiated *after* entering the industry.

**Testimonies.** The problematic use of drugs/alcohol by performers and punters alike is testified to by numerous women who have left the strip trade<sup>9</sup>.

### More Information

- ▶ Substance Abuse

## Prior Abuse: Common

Lap dancing is often just part of a continuum of abuse. Already vulnerable women enter the industry and are then again trapped in an abusive situation.

**Testimonies.** Women testify how this prior abuse was a driving force in their entering the strip trade, how it meant they stayed trapped in the industry and potentially then went into prostitution<sup>10, 11, 12, 13,14</sup>.

**Disclosures.** It is reflected by many of those currently in, or supportive of the strip trade, who frequently disclose prior abuse, including childhood sexual abuse.

**Research.** It is reflected by research suggesting prior abuse is normal in the strip trade<sup>15</sup>, so much so that:

**1/3 lap dancers in just a 6 month period experience Domestic Violence.** A high proportion of women are in abusive relationships *whilst* lap dancing<sup>16</sup> (1 in 3 according to one study over just a 6 month period - far higher than the 1 in 4 women who experience domestic violence during their entire lifetime).

**2/3 lap dancers were raped as children.** A high proportion of women in lap dancing have experienced childhood sexual abuse (2/3 according to one study<sup>17</sup>).

### More Information

▶ Prior / Ongoing Abuse



Essentially, the way the strip industry makes money, is through sexual contact, close links to local brothels, and fraud. All regulation is circumvented by strip clubs<sup>18</sup>. This is undetectable and unstoppable.

### 'Should be called Lap Grinding, not Dancing' Survivor

**CCTV.** Invariably has multiple blind spots - often pointed out to dancers. Footage is often 'lost' or of low quality (so much so that a rape recorded on CCTV was insufficient evidence to lead to a conviction<sup>19</sup>). In a dimly lit room, with poor CCTV, how is it possible to see if there is touching when the rules allow women to get within a hair's breadth of contact?

**Security.** Are beholden to the club. Dancers often tip them to 'turn a blind eye'. Often they are the ones harassing women who pass by.

**Council Inspections.** Are equally meaningless. Bouncers on the door see inspectors walking down the street and radio through to the club. By the time inspectors 'rush in', there's not a breach in sight.

**Camden – a Case Study.** Camden Inspections have only ever exposed sexual touching once and never any other breaches. Yet Camden clubs are a litany of abuse - multiple counts of GBH, including near-fatal stabbings; mass fraud; rampant sexual contact, with sex acts on offer and pimps outside every club<sup>20</sup>.

### More Information

- ▶ Video
- ▶ Fraud
- ▶ Camden Clubs



Verbal, physical and sexual harassment and assault of lap dancers is standard and constant. This is carried out by punters and staff<sup>21</sup> alike. Assault<sup>22</sup> includes GBH<sup>23</sup>, stalking, rape<sup>24,25</sup> and gang rape<sup>26</sup>. Lap dancers have been ejaculated on<sup>27</sup>. They've been bottled.<sup>28</sup> Drunk, half-naked dancers have been dumped in the street<sup>29</sup>. Underage dancers<sup>30,31,32</sup>, non-payment<sup>33</sup>, prostitution and trafficking are also not uncommon. The culture of normalisation, denial and intimidation ensures reports are rarely made. Even with police intervention, women rarely press charges.

The violence associated with the industry extends to assaults by staff/punters on each other and on passers by. It includes arson<sup>34</sup>, mass brawls<sup>35,36</sup>, stabbings<sup>37,38</sup>, false imprisonment<sup>39</sup>, drink spiking<sup>40,41,42</sup>, extreme property damage<sup>43,44</sup> (including life threatening arson<sup>45</sup>). It includes hospitalisations<sup>46,47</sup>, near-fatal<sup>48,49</sup> and fatal<sup>50</sup> attacks. It includes lap dancers attacking each other due to the intense competition cultivated by the industry<sup>51,52,53</sup>. Even for the most serious incidences, the police might not be called<sup>49</sup> and/or the clubs might continue to operate<sup>49,49</sup>.

Incidences are so numerous that they are best exemplified on a club-by-club basis as recorded [here](#)<sup>54</sup>. This is only the tip of the iceberg - the vast majority of incidences will never see the light of day.

### More Information

- ▶ Abuse by Management
- ▶ UK Incidences



Lap dancing fuels both the supply and demand for prostitution<sup>55</sup>. It 'grooms' women for the wider sex trade. Many women in clubs seek to prostitute themselves, others will move on to the wider sex industry. Trafficked women are also frequently suspected to be worked inside clubs.

Almost invariably, punters solicit lap dancers for sexual contact and sex acts inside clubs and for sex outside of them, whilst pimps are often outside touting for the local brothel.

The mere presence of a strip club in the high street also signals the utter normality and absolute right of men to buy women sexually, further fuelling demand:

**UK Home Office report**<sup>56</sup> The *majority* of lap dancers also sell sex. The longer a woman has been stripping, the more likely it is she will be selling sex.

**USA**<sup>57</sup> 40% of lap dancers sell sex. 90% started *after* starting stripping.

**1/3 punters buy sex in strip clubs.** Significant numbers of punters buy prostitution in strip clubs<sup>58</sup>. A Scottish study indicates 1/3 of men who buy sex do so via strip clubs<sup>59</sup>.

**Undercover scrutiny.** Undercover investigation of strip clubs by the police, Trading Standards, Private Investigators and journalists invariably show strippers seeking to prostitute themselves and punters' constant soliciting for sex<sup>60</sup>.

**Testimonies.** Numerous testimonies from whistle blowers support this, as do reviews by punters<sup>60</sup>.

Metropolitan Police:

'There are Sex Touts outside every Camden strip club'<sup>61</sup>

'Bella' from Bristol:

'Lap dancing 'groomed' me for the wider sex industry'<sup>55</sup>

Bristol Woman in the sex trade:

'We were sent into the Bristol strip clubs from the local brothels to pick up punters. Every woman I've known who first went into stripping has ended up in prostitution ... 75% ended up with drug problems working on the streets'<sup>55</sup>

Iceland and Israel have shut down the entire strip industry because of its clear links with prostitution.

More Information

- ▶ [Faq](#)
- ▶ [Video](#)

## Punter Attitudes



Although little research has focused on strip club clientele, that which has indicates the misogynistic attitudes of customers.

Indeed, according to one report, 80% of men visit strip clubs for a 'voyeuristic experience'. The report continues: 'They are one of the very few places where men need not have any concerns about, or be sanctioned for, openly objectifying women'<sup>62</sup>. More than half the men in this study indicated they used

strip clubs to **escape the normal codes of conduct** which otherwise 'restrain' them.

The attitudes of strip club customers is best exemplified by their own words:

'It's like a place where 'equality never happened' <sup>63</sup>

'It's great to have that kind of power and control' <sup>64</sup>

'with all this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want' <sup>65</sup>

'You can go in there and 'shop for a piece of meat'' <sup>63</sup>

It is irrelevant whether punters had these attitudes before they stepped through the door – these are the attitudes the strip industry aggressively cultivates, normalises and promotes.

## Wider Attitudes

There is an epidemic of male violence against women This happens *because* of men's attitudes. It has been known for decades that this abuse is directly linked to objectification and men's sense of sexual entitlement over women<sup>66</sup>. But this is exactly the attitudes strip clubs promote. Indeed, it is the entire premise of the industry.

- [Brain Scans show objectified women are viewed as objects, not humans](#)
- [Men with macho attitudes 6 times more likely to harass women](#)
- [75% rapists say sexual entitlement is their prime motivator](#)
- [Sex buyers more abusive towards women](#)
- [Objectification linked to severe intimate partner violence](#)

More Information

- ▶ [Punter Attitudes](#)
- ▶ [Wider Attitudes](#)

## Women's Attitudes

It should be noted that strip clubs also damage women's attitudes towards men:

**Research.** Even research based primarily on questionnaires (hardly the best way to gather evidence of harm) suggests the impact on lap dancers is so great that 1 in 3 'have lost all respect for men'<sup>67</sup>.

**Testimonies** Even while in the industry, women attest to how it has led them to 'hating' and 'despising' men – often to the point of being unable to have healthy, or indeed any, relations with men<sup>10, 68</sup>.

The intense competition that clubs foster between lap dancers also breeds **poor relations between women** – to the extent that fights between lap dancers are not uncommon<sup>51,52,53</sup>.

## No Go Zones

Studies and testimonies from across the world<sup>69</sup>, indicate that women feel, and often *are*, **less safe in the vicinity of strip clubs** - sometimes to the point of avoiding the local area entirely, regardless of whether the club is open or overtly advertises. This form of self-enforced curfew is arguably a breach of human rights<sup>70</sup>.

In addition, the mere knowledge that a strip club operates makes many women feel that their function as a **sexual object and men's sexual rights** over them are being reinforced and legitimised - another reason for avoidance.

Councils must pay heed to the fact that claims by individuals of 'positive experiences' or 'feeling more safe' in the vicinity of a strip club **do not 'balance out'** the experiences of others of harassment, abuse and assault – or the fear of it.

### More Information

▶ No Go Zones



Councils across the country routinely breach both strip club (SEV) licensing legislation and equality law<sup>71,72,73</sup>. They appear to have little or no understanding of the most basic tenants of SEV legislation whether in the formation of policy or its implementation. At the same time, councils are routinely misdirected by the lawyers who represent strip clubs.

## SEV legislation

Councils frequently breach SEV (strip club) legislation both through creating unlawful policies and through making unlawful licensing decision.

### Policy

Councils frequently and unlawfully:

- Write policy around existing clubs
- Do not appreciating the absolute right to create a 'Zero Policy' (no clubs appropriate anywhere)
- Exclude existing clubs from their own SEV policy, even from a zero policy

### Licensing Decisions

Councils consistently show no understanding of their sweeping powers to refuse to license or relicense existing clubs on the grounds of locality or that:

- There need be no change in locality
- There need be no material changes whatsoever
- No evidence (of harm or anything else) is required
- Strip clubs cannot challenge such a decision except via the High Court (a very difficult route, which invariably fails)

## Equality Law

Councils are legally bound by the Public Sector Equality Duty (PSED) in all their policies and licensing decisions. Under this they must seek to:

- ‘Eliminate harassment, discrimination and victimisation’ of women
- ‘Foster good relations’ between the sexes

This applies within strip clubs, in their vicinity *and* in wider society.

There have now been two successful High Court challenges<sup>74</sup> against one council, Sheffield. These highlight how councils across the UK are failing to comply with equality law. This includes wrongly dismissing objections to clubs as ‘moralistic’ as well as not properly considering the PSED (for instance through a poor Equality Impact Assessment’ – a common practice of Councils UK wide).

According to the Judge in both cases:

**“.. [The Council] had wrongly ignored objections based on the potential impact of gender equality, treating them as moral objections and irrelevant”**

And in the words of the lead solicitor:

**“A local Authority .. must look long and hard at the adverse impact on gender equality of letting such an enterprise exist AT ALL.**

**Otherwise, it will be acting unlawfully and will be subject to legal challenge”<sup>75</sup>**

## Workplace Harassment

It should also be noted that business use of strip clubs is clearly a form of workplace sexual harassment. **Further, the mere use of, and discussions about, strip clubs by individuals has been ruled as a form of sexual harassment, if a business is supportive or acquiescent to such conduct<sup>76</sup>.**

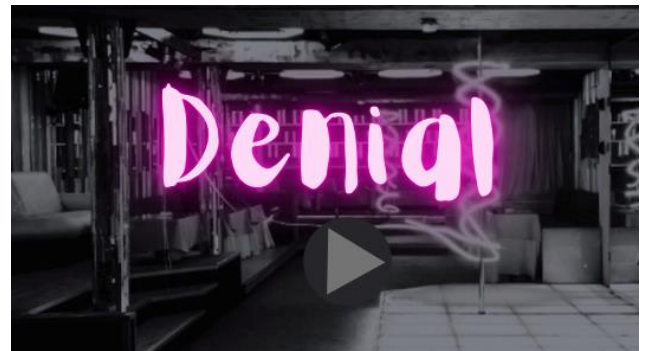
This makes it even more shocking that strip clubs discounts were offered to delegates at the 2008 Conservative party conference<sup>77</sup>, with the Bolton

Conservatives hosting ‘men only’ events with strippers as recently as 201<sup>78</sup>. University staff have also reportedly claimed expenses for strip club visits, again as recently as 2018<sup>79</sup>.

### More Information

▶ Legal Briefing

## Who Are You Listening to?



*No one* in lap dancing can be open, or often acknowledge even to themselves, what really happens or its inherent harms. This denial is an essential self-preservation mechanism.

**Testimonies.** This denial is testified to by numerous women who have exited the strip trade<sup>80</sup>.

**Research.** Denial, condemning objectors and ‘higher loyalties’ to strip clubs has long been recognised by researchers from as long ago as 1992<sup>5</sup>. Ten years later, similar research added ‘cognitive and emotional dissonance’ to the list<sup>6</sup>.

**Actions.** Denial is clearly demonstrated by the actions of those in the strip trade. Industry workers, its supporters, the trade unions that represent lap dancers deny even irrefutable evidence of extreme sexual contact, sex acts and mass fraud and defend clubs even after sexual assault and rape<sup>81, 82</sup>.

## MYTHS

Many of the justifications for keeping strip clubs open (and the supposedly dire consequences of closing them) are based on misinformation and fear mongering<sup>83</sup>:

### Unemployment



Employment should not be a consideration for decisions on SEVs, however it should be noted that **strip clubs actually keep women out of paid work**<sup>84</sup>.

Lap dancers are not paid to work, instead they must pay up front to work in a strip club. These 'House Fees' can be up to £200. So, women have *lost* money - are in debt to the club - before they even start working.

'It's a form of Debt Bondage' Cassy<sup>11</sup>

Lap dancers then **work for free in the club except during private dances**, which can go for as little as £10 (particularly with '2-for-1 specials'). On top of this, strip clubs invariably have far too many lap dancers to punters, making private dances hard to come by (and so too the chance for women to even recoup their debt let alone actually make money).

Lap dancers are also **fined, frequently**<sup>2,11,67</sup> (often on the flimsiest of excuses such as 'chewing gum' or 'not smiling enough').

Women must also **pay commission, of up to 66%** so they are losing money yet again by giving a portion of their takings back to the club.

## Page 63

Lap dancers can work a 7hr all-night shift and not make a penny – or *still* be in debt to the club. In fact, according to one study:

### 70% lap dancers lose money at work<sup>67</sup>

We are currently seeing record levels of employment and entire sectors, such as hospitality and leisure, facing extreme staff shortages. Everyone currently working in a strip club could easily be redeployed in these workplaces, where similar skills are involved. **The owner of Bristol's strip clubs already appears to have trained up lap dancers as (topless) waitresses**<sup>84</sup>.

Former lap dancers could even work in exactly the same venues re-purposed as night clubs, bars, restaurants. Councils can, and should, signpost women to any alternative training or support required when they stop licensing strip clubs.

### 'Going Underground'



It is invariably stated that the industry will 'go underground' if licensed strip clubs are shut. However, the exact opposite is true. **Strip clubs feed the underground industry, not their closure.**

'Private Parties'. Strip club operators often organise women to attend 'private parties'<sup>1919,85</sup>. When the strip clubs close, the 'parties' stop. **Bristol's strip club operator even openly advertises**<sup>86</sup> naked women as entertainment for private parties in men's homes.

**Prostitution.** As detailed above, there is overwhelming evidence that it is the *presence* of strip clubs that fuel prostitution *not* closing them.

'Underground strip clubs'. It has even been argued that 'underground strip clubs' will materialise if there are no licensed strip clubs.

in terms of it being a **healthy lifestyle**, in the words of one former dancer:

## 'Choice'



The argument that women 'choose' lap dancing is actually irrelevant, because the same harms are experienced regardless of whether it is chosen. Even if women haven't been coerced into it or chosen it due, in part, to prior abuse, the 'choice' argument is negated. That's because there can be no genuinely free or informed choice<sup>87</sup> when we groom girls from a young age to objectify themselves, when the myth of 'harmless, well regulated, empowering, fun' is constantly regurgitated, when they have no idea of the harms and when those who do speak out are aggressively dismissed and smeared<sup>88</sup>.

## 'flexible. Independent Work'

It is often stated lap dancing is a flexible, healthy lifestyle for 'independent workers' who are in full control of every aspect of their lives. But in reality, **strip clubs control every aspect of lap dancers' work** - their time (which nights they work, as well as how they spend their time at work), their earnings, their appearance.

And how **'flexible'** is it to work an exhausting all-night shift (possibly making no money) and then study, go to a second job or take on caring responsibilities the next day?

'The job entails minimal exercise (most of us aren't doing athletics around a pole), with most of our time spent sitting around, drinking (drugs are also often involved). There's an endless and expensive grooming routine (including full body shaving leading to ingrowing pubic hairs), eating at 6AM at the local McDonalds after an all-night shift and a night-time pattern of work often coupled with day-time responsibilities. It couldn't be more *unhealthy!*'

## Threat & intimidation



It is particularly concerning how threat and intimidation is routinely used to smear and discredit all who speak out and censor the truth or any debate. **In Bristol<sup>88</sup>**, this has included **cyber stalking** of a local women and an incendiary petition (based entirely on fear mongering and misinformation) which **targets public figures such as MPs** – which clearly puts them at risk.

## To Conclude

The evidence of the harm of the strip industry is overwhelming. Much of this harm is inherent so it can never be mitigated, whilst attempts to mitigate other harms are routinely and covertly circumvented, leaving councils with no meaningful way to detect breaches in regulation. All this, means **councils cannot possibly abide by the law or ensure safeguarding when licensing the strip industry.**



- 1 'Stop Looking at Me! Interpersonal Sexual Objectification as a source of Insidious Trauma'. Miles-Mclean et al. *Psychology of Women*:  
<https://journals.sagepub.com/doi/10.1177/0361684314561018>
- 2 Video: Lap Dancer Testimonies. Not Buying It <https://youtu.be/pMZbdXg43dk>
- 3 'Vicky'. Not Buying It:  
[https://notbuyingit.org.uk/sites/default/files/LAP%20DANCING%20testimony\\_%20Vicky.pdf](https://notbuyingit.org.uk/sites/default/files/LAP%20DANCING%20testimony_%20Vicky.pdf)
- 4 'Dancing on the Mobius Strip. Challenging the Sex War Paradigm' Barton. *Gender & Society*:  
[https://www.researchgate.net/publication/249668255\\_Dancing\\_on\\_the\\_Mbius\\_StripChallengin\\_g\\_the\\_Sex\\_War\\_Paradigm](https://www.researchgate.net/publication/249668255_Dancing_on_the_Mbius_StripChallengin_g_the_Sex_War_Paradigm)
- 5 'Topless Dancers: Managing Stigma in a Deviant Occupation' Thompson & Harred. *Deviant Behaviour*: <https://www.tandfonline.com/doi/abs/10.1080/01639625.1992.9967914>
- 6 'Managing the Stigma of Topless Dancing a Decade Later' Thompson et al. *Deviant Behaviour*:  
<https://www.tandfonline.com/doi/abs/10.1080/713840274?src=recsys>
- 7 'Exotic Dancing & Health' Maticka-Tyndale et al. *Women & Health*:  
[https://doi.org/10.1300/J013v31n01\\_06](https://doi.org/10.1300/J013v31n01_06)
- 8 The Occupational Milieu of the Nude Dancer' Forsyth & Deshotel. *Deviant Behaviour*:  
<https://www.tandfonline.com/doi/abs/10.1080/01639625.1997.9968049>
- 9 'Lap Dancing – Unsafe & Unfit for Lap dancers' Not Buying It:  
<https://www.notbuyingit.org.uk/sites/default/files/UnsafeUnfit.pdf>
- 10 'Gemma'. Not Buying It: <https://youtu.be/3lWqjNQNpk>
- 11 'Cassy'. Not Buying It: <https://youtu.be/JrsoPER9CJQ>
- 12 'Irina'. Not Buying It: <https://youtu.be/ClpUOYeG08c>
- 13 'Mel'. Not Buying It: [https://youtu.be/nBgV\\_VFSPLQ](https://youtu.be/nBgV_VFSPLQ)
- 14 Video 'Choice'. Not Buying It: <https://www.notbuyingit.org.uk/sites/default/files/Choice.pdf>
- 15 'Psychotherapy with women who have worked in the 'Sex Industry' Ankesaria & Gentile. *Innov. in Clinical Neuroscience*: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3508959/#B5>
- 16 'Client and Partner Violence Among Urban Female Exotic Dancers and Intentions for Seeking Support and Justice' Decker et al. *J. Urban Health* <https://europemc.org/articles/pmc5610130>
- 17 'What's a nice girl like you doing in a place like this?: Pathways to a career in stripping' Sweet & Tewksbury. *Sociological Spectrum*:  
[https://www.researchgate.net/publication/263173373\\_What%27s\\_a\\_nice\\_girl\\_like\\_you\\_doing\\_in\\_a\\_place\\_like\\_this\\_Pathways\\_to\\_a\\_career\\_in\\_stripping](https://www.researchgate.net/publication/263173373_What%27s_a_nice_girl_like_you_doing_in_a_place_like_this_Pathways_to_a_career_in_stripping)
- 18 Video: 'Regulation'. Not Buying It: <https://notbuyingit.org.uk/vidregulation>
- 19 Testimony on Camden Clubs. Not Buying It: <https://notbuyingit.org.uk/wp-content/uploads/documents/CAMDEN-Concerns.pdf>
- 20 Camden's Strip Trade. Not Buying It: <https://notbuyingit.org.uk/camden>
- 21 Abuse by Management/Staff. Not Buying It <https://notbuyingit.org.uk/abusebymanagement>
- 22 Punter attacks dancer for refusing sex: <https://www.liverpoolecho.co.uk/news/liverpool-news/thug-attacked-liverpool-stripper-stole-9259574>
- 23 GBH on dancer by customer: <https://www.thestar.co.uk/news/punter-attacks-stripper-outside-south-yorkshire-strip-club-after-she-%20refused-to-sleep-with-him-1-8508457/amp>
- 24 Serious sexual assault of lap dancer by staff: <https://notbuyingit.org.uk/wp-content/uploads/documents/CAMDEN-Concerns.pdf>
- 25 Serious sexual assault: <https://democracy.towerhamlets.gov.uk/mgAi.aspx?ID=82394>
- 26 Strip club gang rape:  
<https://birmingham.cmis.uk.com/Birmingham/Document.ashx?czJKcaeAi5tUFL1D1L2UE4zNRBcoShgo=a0i6ZF5FpCnOi9UA2A1wi%2bty%2bqYoGaNbnjGKCjJl0oZtOxoHeOkLg%3d%3d&rUzWRPF%2bZ3zd4E7lkn8LWw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCTPHwdhUfCZ%2FLUQzGA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFFXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fWZQ40DXFvEdw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAjvYtyA%3d%3d=ctNJFF55vVA%3d&FgPIEJYlotS%2bYGoBi5oIA%3d%3d=NhdURQburHA%3d&d9QjOag1Pd993jSyOJqFvmyB7XOCsQK=ctNJFF55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFF55vVA%3d&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJFF55vVA%3d>
- 27 Punter ejaculates on lap dancer: <https://www.independent.co.uk/news/uk/crime/amranuzzman-chowdhury-sexual-assault-dancer-strip-club-bristol-weston-super-mare-a9116901.html>
- 28 Dancer bottled Appendix 10:  
<http://democracy.camden.gov.uk/documents/g7380/Public%20reports%20pack%2025th-Jan-2018%2019.00%20LICENSING%20SEXUAL%20ENTERTAINMENT%20VENUES%20SUB-Committee.pdf?T=10>
- 29 Dancer dumped on street:  
[http://www.ardrossanherald.com/news/15023857.Glasgow\\_kingpin\\_s\\_lap\\_dancing\\_club\\_shut\\_after%20\\_girl\\_dumped\\_on\\_street/](http://www.ardrossanherald.com/news/15023857.Glasgow_kingpin_s_lap_dancing_club_shut_after%20_girl_dumped_on_street/)
- 30 Underage lap dancers: <https://www.lancs.live/news/lancashire-news/underage-allegations-blackpool-lap-dancing-18670445>
- 31 La Salsa underage dancers: <https://www.examinerlive.co.uk/news/west-yorkshire-news/owner-huddersfield-lap-dancing-club-4981668>
- 32 Leicester underage dancers: <https://www.leicestermercury.co.uk/news/leicester-news/strippers-fondled-sexually-touched-punters-184059>
- 33 Silks lap dancers not paid: <https://notbuyingit.org.uk/wp-content/uploads/2019/10/Leeds-Silks-Worker-Reviews.pdf>
- 34 Arson: <https://www.kentonline.co.uk/maidstone/news/ex-club-director-charged-after-arson-44527/>
- 35 Mass brawl: <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/silks-lap-dance-club-manchester-12877276>
- 36 Attack by bouncer/Mass brawl:  
<https://ealing.cmis.uk.com/ealing/Document.ashx?czJKcaeAi5tUFL1D1L2UE4zNRBcoShgo=uACEYhPOXTDgKVQ%2B0GQ3t4%2BcY7RPQslmCmYs8orKYTWWB6dSsTwg%3D%3D&rUzWRPF%2BZ3zd4E7lkn8LWw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWCTPHwdhUfCZ%2FLUQzGA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFFXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fWZQ40DXFvEdw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAjvYtyA%3d%3d=ctNJFF55vVA%3d&FgPIEJYlotS%2bYGoBi5oIA%3d%3d=NhdURQburHA%3d&d9QjOag1Pd993jSyOJqFvmyB7XOCsQK=ctNJFF55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFF55vVA%3d&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJFF55vVA%3d>
- 37 Stabbing: <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/baby-platinum-lap-dancing-club-6389343>
- 38 Stabbing in club: <https://www.birminghammail.co.uk/news/local-news/man-stabbed-in-wolverhampton-strip-club-222885>
- 39 Punter prevented from leaving: <https://notbuyingit.org.uk/wp-content/uploads/2021/11/plymouth-punter.pdf>
- 40 Camden Sophisticats, Drink Spiking & Mass fraud:  
<https://democracy.camden.gov.uk/documents/s86687/Report%20-%20Sophisticats%20SEV%20Renewal.pdf>
- 41 Drink spiking: <https://www.telegraph.co.uk/news/2017/07/27/lap-dancing-club-spiked-customers-drinks-overcharged-dances/>
- 42 Camden Red Rooms: poisoning App.8 [Oct 2019]:  
<https://democracy.camden.gov.uk/documents/s87972/Report%20-%20Red%20Rooms.pdf>
- 43 Damage to property: <https://www.examinerlive.co.uk/news/west-yorkshire-news/man-smashed-lap-dance-club-11379793>
- 44 Damage to property: <https://www.dailymail.co.uk/news/article-3209117/Stag-party-guest-smashed-lap-dancing-bar-like-coconut-shy.html>
- 45 Life threatening arson: <https://www.hackneygazette.co.uk/news/crime/hackney-landlord-given-11-000-court-bill-over-life-threatening-3624014>
- 46 Mass brawl: <https://www.chroniclive.co.uk/news/north-east-news/dean-street-incident-six-arrested-14938519>
- 47 Assault of punters in club leads to hospitalisation:  
<https://www.plymouthherald.co.uk/news/plymouth-news/two-men-hospitalised-after-assault-1090634>
- 48 Near Fatal attack: <https://www.standard.co.uk/news/crime/man-fighting-for-life-after-being-stabbed-inside-holborn-lapdancing-club-a4320131.html>
- 49 Near fatal stabbing:  
<http://registers.camden.gov.uk/RegisterFiles/Licensing/CC/2017/Licensing%202003%20pdf/2019/DEC/REV/100309/Superintendent%20Moorhead%27s%20693A%20signed%20form%20P2%20Redacted.pdf>
- 50 Fatal stabbing: [https://www.bbc.co.uk/news/uk-england-manchester-38428636?ocid=socialflow\\_twitter&ns\\_mchannel=social&ns\\_campaign=bbcnews&ns\\_source=twitter](https://www.bbc.co.uk/news/uk-england-manchester-38428636?ocid=socialflow_twitter&ns_mchannel=social&ns_campaign=bbcnews&ns_source=twitter)
- 51 Lap dancer attack: <https://www.pressandjournal.co.uk/fp/news/aberdeen-aberdeenshire/576241/aberdeen-stripper-accused-of-bottling-rival-dancer-in-lap-dancing-club/>
- 52 Attack between Lap Dancers: <https://www.bournemouthcho.co.uk/news/19093502.woman-hit-rival-jug-bournemouth-lapdancing-club-wiggle/>
- 53 Attack between lap dancers: <https://www.newsandstar.co.uk/news/16742206.bust-up-lap-dancers-carlises-rouge-nightclub-ends-court/>
- 54 Incidences UK-wide. Not Buying It: <https://notbuyingit.org.uk/uk>
- 55 Video: 'Feeding Prostitution'. Not Buying It: [www.notbuyingit.org.uk/vidprostitution](http://www.notbuyingit.org.uk/vidprostitution)
- 56 The Nature and Prevalence of Prostitution & Sex Work in England & Wales Today' Home Office Report p27  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/842920/Prostitution\\_and\\_Sex\\_Work\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/842920/Prostitution_and_Sex_Work_Report.pdf)
- 57 'The Development of an HIV Environment Risk Analysis Scale of Exotic Dance Clubs'. Sherman et al. *Aids Behav*: <https://www.ncbi.nlm.nih.gov/pubmed/28337633>
- 58 'Behind the Curtain': Strip Clubs and the Management of Competition for Tips'. Mount. J *Contemporary Ethnography*  
<https://www.notbuyingit.org.uk/sites/default/files/BehindTheCurtain.pdf>
- 59 'Attitudes and social characteristics of men who buy sex in Scotland' Farley et al. *APA Psyc Net*:  
<https://psycnet.apa.org/record/2011-06105-001>
- 60 Feeding Prostitution. Not Buying It: <https://notbuyingit.org.uk/stripprostitution>

- 61 Camden Licensing Report Pack p285:  
<https://democracy.camden.gov.uk/documents/g9603/Public%20reports%20pack%2007th-Dec-2020%2019.00%20Licensing%20Sexual%20Entertainment%20Venues%20Sub-Committee.pdf?T=10>
- 62 'The Gentlemen in the Club' Erickson, Tewsbury, Erickson. Deviant Behaviour:  
<https://www.tandfonline.com/doi/abs/10.1080/016396200266261>
- 63 'Just Trying to Relax' Frank. J. Sex Research: <https://www.ncbi.nlm.nih.gov/pubmed/12806532>
- 64 Evening Standard: <https://www.standard.co.uk/hp/front/addicted-to-lapdancing-7296984.html>
- 65 'Exploring the Motives & Fantasies of Strip Club Customers in Relation to Legal Regulations' Frank. Archives of Sexual Behaviour:  
[https://www.academia.edu/325484/Exploring\\_the\\_Motivations\\_and\\_Fantasies\\_of\\_Strip\\_Club\\_Customers\\_In\\_Relation\\_to\\_Legal\\_Regulations](https://www.academia.edu/325484/Exploring_the_Motivations_and_Fantasies_of_Strip_Club_Customers_In_Relation_to_Legal_Regulations)
- 66 'The Wider Impact'. Not Buying It: <https://notbuyingit.org.uk/widerimpact>
- 67 The Regulatory Dance: Sexual Consumption in the Night time Economy' Sanders, Hardy. University of Leeds:  
<https://www.notbuyingit.org.uk/sites/default/files/Sanders%20Initial%20Findings.pdf>
- 68 'Elena'. Not Buying It: <https://www.theguardian.com/world/2008/mar/19/gender.uk>
- 69 'No Go Zones' Summary of evidence. Not Buying It <https://notbuyingit.org.uk/nogozones>
- 70 'Sex Licensing' Kolvin p87
- 71 'Legal Briefing on Strip Clubs'. Not Buying It: <https://notbuyingit.org.uk/striplegal>
- 72 Video: The Law. Not Buying It: <https://notbuyingit.org.uk/vidlaw>
- 73 Strip Clubs & the Law. Not Buying It: <https://notbuyingit.org.uk/law>
- 74 'Sheffield Shame: Summary of Successful Legal Proceedings vs Sheffield City Council'  
<https://notbuyingit.org.uk/wp-content/uploads/documents/SheffieldShame.pdf>
- al Government Lawyer: <https://localgovernmentlawyer.co.uk/licensing/399-licensing-news/34572-council-admits-failure-to-comply-with-equality-duty-over-spearmint-rhino-licence>
- 76 Redmans Solicitors: <https://www.redmans.co.uk/furlong-v-bmc-software-limited-discussions-regarding-lapdances-and-prostitutes-constituted-discrimination/>
- 77 Conservative party 'lap dance' discounts:  
[http://news.bbc.co.uk/1/hi/england/west\\_midlands/7615733.stm](http://news.bbc.co.uk/1/hi/england/west_midlands/7615733.stm)
- 78 Bolton Conservatives 'Stripper party':  
<https://www.independent.co.uk/news/uk/politics/conservative-presidents-club-strippers-waitresses-bolton-horwich-gentlemens-evening-greater-manchester-a8177706.html>
- 79 University staff claim expenses for strip clubs and sex shops:  
<https://thetab.com/uk/2018/08/06/revealed-university-staff-spent-thousands-in-strip-clubs-and-sex-shops-76288>
- 80 Survivor Testimonies. Not Buying It: <http://www.notbuyingit.org.uk/survivors>
- 81 Video: Denial. Not Buying It: <https://notbuyingit.org.uk/viddenial>
- 82 'What Industry Supporters say'. Not Buying It: <https://notbuyingit.org.uk/supporters>
- 83 'Myths'. Not Buying: <https://notbuyingit.org.uk/myths>
- 84 Video: 'Putting Women out of Work'. Not Buying It <https://notbuyingit.org.uk/vidwork>
- 85 Video: 'Going Underground'. Not Buying It: <https://notbuyingit.org.uk/vidunderground>
- 86 Bristol Clubs feed 'Private Parties'. Not Buying It: <https://notbuyingit.org.uk/wp-content/uploads/2019/10/Feeding-the-Unlicensed-Industry.pdf>
- 87 Video 'Choice'. Not Buying It: <https://notbuyingit.org.uk/vidchoice>
- 88 Video: Threat & Intimidation. Not Buying It <https://notbuyingit.org.uk/vidintimidation>

## **SEXA Support Comments**

**1.**

I am writing to express my strong support for the licence application submitted by Under the Prom. I believe that Under the Prom will contribute positively to the vibrant nightlife while maintaining a commitment to responsible alcohol service.

I have attended events organised by Under the Prom in the past and have always been impressed by their dedication to creating a safe and enjoyable environment. Their adherence to security measures, strict age verification, and cooperation with local law enforcement demonstrate their commitment to public safety.

Furthermore, Under the Prom has proven to be an active participant in community initiatives, supporting local charities and events. Their commitment to being a responsible venue aligns with the values of the community.

Thank you for considering my input in support of Under the Prom's licence application.

**2.**

To whom it may concern,

Being a regular member of Staff at Under the Prom in Cheltenham and having worked in Cheltenham during the Cheltenham Gold Cup in March 2024, I would like to offer my support to Philip and Ross on the granting of a lap dancing application on their behalf by Steven Burrows / Eroticats

It is a well-run club, that doesn't have any trouble, which has provided Cheltenham lap dancing via a temporary event notice for the last 7 years. I feel that granting a proper license for the week of March would benefit Cheltenham greatly

I would like to support the granting of this licence.

**3.**

I would like to support the granting of the Sexual Entertainment Licence at Under the Prom during the Cheltenham March festival 2024

I'm fully supportive of the owner's decision of the proposed SEL during the Cheltenham March festival 2024 and the use of Steven Burrows and the Eroticats dancers.

Having worked with Steven and dancers during the March & November Festivals (under the exemption rule) I believe they are a credit to Cheltenham going above and what is expected with this much needed entertainment during the Cheltenham March & November festivals.

I have experienced Cheltenham during March and November festivals for many years now. Having witnessed the positive and negative side to this sort of entertainment regulating and controlling this sort of entertainment can only be a positive.

Please give this application credit and consideration I believe it deserves.

4.

I have seen the application for the March races and would like to support it.

Philip has been the best tenant we have had to date and everything that he does is for the betterment of the locale, guests of Cheltenham, his team, and his neighbours. He conscientiously works to ensure that people are happy and their enjoyment of their home or work location is undisturbed. He has been a tenant of ours for 8 years and we hope he continues to be a tenant for many years to come. To his credit he has created a community between the other offices on the promenade and built relations with all the property owners on imperial gardens, so we only get compliments about the activity at under the prom, whereas with his predecessors we'd be getting complaints.

5.

I have worked in the hospitality industry in Cheltenham most of my adult working life from the largest venue in Cheltenham and in more recent years the smaller niche venues.

I was very sceptical and questioned myself ideas suitable for lap dancing. After my initial meeting with Steve and members of the Eroticats dancers. My mind was put at ease as the planning and procedures plus the detailed attention to the health and safety, was second to none. Clearly there is a need for lap dancing entertainment during the horse race festivals, If this is not regulated and controlled, it would undoubtedly go underground.

Anti-social behaviour increases during the Cheltenham festivals with the resources of the Gloucestershire constabulary greatly put to the test. A regulated SEV gives the Cheltenham police force a partner to work with that provides a safe working environment for the dancers all members of staff and the customers who visit Cheltenham.

I have attended a talk from GRASA March 2023 and bystander training July 2023 organized by the CBC and PCC.

I gave my email address being told I would be receiving a certificate of attendance, as of yet still waiting.

I would urge this application renewal be given the consideration and support I believe it deserves during Cheltenham race festivals.

**6. No address provided comments not included. The address was requested on receipt of the comments and yet was not provided by 03/01/2024. It was made clear that names and addresses of persons making comments would not be put into the public domain, and that we needed names and addresses for audit purposes to demonstrate that comments are made in good faith. This is the case with all comments so marked below.**

**7. No address provided**

8.

I have attended the Cheltenham races for many years. My girlfriend and I attended Eroticats in March for the first time ....

The club was very well run by friendly and professional staff, we enjoyed ourselves so much we attended Eroticats again in November.

I find objections to a sexual entertainment licence absurd!

Isn't it better to have a controlled club operating under the guidelines than a backstreet pop up sleazy club with God knows what going on.

**9.**

My partner and I would like the choice to attend strip shows either by male or female strippers.

Strip shows are attended by all genders and popular in Cheltenham in March which I should have the right to visit without criticism. I am not a man just looking for sex, as portrayed in many objections.

A female has the right to dance without any discrimination and men and women the right to attend without objection. If Cheltenham council has the opportunity to set the safe code of practice for the safety of female dancers and those in attendance it should be taken without a doubt.

I would support this license being granted on the grounds of equality.

**10.**

To whom it may concern,

I am writing to you to thank you for your service thus far.

I would like to express once again my support for the license for Eroticats.

As a female I often find nights out overwhelming and unsafe. My friend and I visited Eroticats and we were both impressed and relaxed by a clean, well-managed establishment. All the staff were polite, professional, and very attentive.

I fully support this license.

**11. No address provided**

**12.**

I would like to support UTP, Promenade Cheltenham application for sexual entertainment licence

Driving the Eroticats courtesy bus for many years providing the safe transportation for the lap dancers and staff.

The courtesy bus service is a much-valued especially with the lap dancers who travel from all parts of the UK, who have had some bad experiences with taxis during the March and November meetings  
The non licensing of a regulated and controlled SEL could result in the loss of this service.

leading to the following, which many a dancer has experienced

Unlicensed taxis

Over charged, inflated prices

unwanted advances

No shows

I would like to add I attend a talk given by a lady from GRASAC who agreed the courtesy bus service was a valuable with the safety of dancers.

Non licensing of a regulated and controlled SEL could result in the loss of this service.

### **13.**

During a lunch with some family members and friends the conversation of the application for a Sexual entertainment in Cheltenham for Under the Prom came up.

I have worked as a SIA door supervisor for nearly 18 years, mainly in Cheltenham and around the Midlands, this includes Under the Prom, MooMoo, Fever, 2 Pigs and other venues during the Cheltenham festival during March.

The festival attracts lot of visitors to Cheltenham town centre and surrounding areas with many looking for this style of entertainment.

Working the sexual entertainment venues, the one thing I have noticed is the way the organisers have put in place the measures to ensure safety and well-being of everyone involved. i.e. the sheer amount of SIA staff that are on the premises, how the entertainers are looked after and their safety being a key factor during the evening / event, staff are escorted to their vehicles at the end of each night, a designated house person who is their just for the entertainers needs, this is just some of the measures that are put in place.

The level of anti-social behaviour or lack of in this case clearly shows the measures that are put in place work effectively. During my 18 years working I have seen less anti-social behaviour at a controlled lap dance venue than any other licensed premises which I have worked, this will be shown on police reports on each individual venue as crime reports logged against the venue.

Cheltenham night-time economy especially the smaller venues, like Under the Prom etc need these nights to continue to remain solvent throughout the year with the ever increasingly quieter periods. Licensing sexual entertainment will also be giving the police and the Cheltenham licensing committee a degree of control when the Cheltenham Festival comes to town, which will be monitored by the authority during the festival.

I'm for the granting of a regulated licence.

### **14.**

Cheltenham is a quiet town with many venues choosing to close mid-week throughout the year, totally changing during the Cheltenham festivals held at Prestbury park where the population of the town triples in size along with the numbers of police to combat the anti-social behaviour the March festival attracts.

Any restrictions or regulations put in place to assist with the policing controlling of Sexual Entertainment License during the March festival will be working in partnership with the local authorities, as of previous years which has a proven track record.

A Sexual Entertainment License renewal refusal would lead to the alternative of the exemption ruling, which has little or no regulations.

The Cheltenham MP urging the committee on the banning of all licences of this nature is simply avoiding the political hot potato leaving the committee with the decision, then criticising for his own political career. He should be addressing the issue and make changes to the legislation of the exemption ruling which has a negative impact as their rules and regulations are not being monitored by the local authority.

I recall the PCC claiming he had looked into Sexual Entertainment License, (2 Pigs) and could find no connection with any sexual assaults.

I have never read of any anti-social behaviour or breaches to the Sexual Entertainment License venues in previous years, so credit should be given where credit it is due.

I sure if he did, he would have used this information.

Granting this application, should be given its merits until the law is changed.

### **15.**

I would like to register my support with the application for Red Apple Ltd, Under the Prom, Cheltenham to be used as a venue for sexual entertainment during the Cheltenham race festivals.

I have worked for Steven on different occasions as a receptionist or cashier during the Cheltenham March and November race festivals. I have always found Steven and the Eroticats dancers a very professional company, which make it a pleasure to work for.

I do value the employment on the race events, relying on the extra monies and would like to continue working for a rare employer who takes responsibility towards health & safety and procedures which this year organizing training by GRASAC for safety of females in Cheltenham's night-time busiest period of the year.

Which includes the safe transportation to and from my home address. Taxi's being difficult to get hold of and very overpriced.

### **16.**

I find myself repeating myself, why fix what is not broken? Lap dancing in Cheltenham has taken place in Cheltenham for a long time, with the Blue Rooms St Margaret Rd, Fantasy Club, Old Bath Rd. Operating 52 weeks of the year, both failing.

Steven Burrows and the Eroticats dancers recognizing the market for lap dancing only during race festival dates in Cheltenham and now operating successfully for more than 14 years and now with more than 8 years with an SEL. Forming a working relationship with the local authorities and the Gloucestershire police providing safe working conditions for all employees and the Eroticats dancers. With Cheltenham town awarded the purple flag since 2016, Something must be working.

The refusal of a licence could open the underground clubs and the pop ups clubs, offering no restrictions and run by?

Could result with the purple flag award at risk, which the council has worked hard to achieved and maintain.

Keep up the good work and grant the SEL.

**17. No address provided**

**18.**

I fully support the application for a sexual entertainment license at Under the Prom during the Cheltenham race meeting in March 2024.

I have attended male strip shows in Cheltenham which does include Dream Boys.

Hosted at Cheltenham town hall, shows have included audience participation on the stage and male strippers walking and sitting on members of the audience. There are two more shows such as these scheduled for 2024 at Cheltenham town hall.

I would like to ask the question why it is acceptable for one gender to strip and not another?

Females should have the same rights as males and not be discriminated against.

I would like notification of all Sexual entertainment license applications of Under the Prom. Refusal of my request results in me believing that I'm being discriminated as a supporter of a regulated Sexual entertainment license, with licensing having chosen to notify objectors on sexual entertainment licences.

**The Licensing team replied...**

*We do give notification to one body that promotes women and young girls safety, this body works with the police and other agencies to help promote the safety of women and young girls. It seems appropriate to notify them of such applications, which they may be likely to miss if not so informed.*

*We notify the BID Team, as we consult with them on many applications that affect the town centre, and due to the partnership relationship, that we have with them.*

*We have refused further requests to notify other persons and/ or groups for the following reasons: -*

- We believe that notifying the above groups is sufficient to allow both local businesses and representatives of groups that promote women and young girl's safety to be informed of such applications, without an undue burden on the authority.*
- We do not believe that there is a similar need to notify those persons/ bodies that might support an application, as the number of letters/ emails of support suggests that the level of awareness of such applications being made is already very high. We regularly receive a high number of such comments from performers, workers at the venues, customers and others known to the applicant which suggests that it is not necessary for us to do this.*
- We do not consult with or notify any individuals of an application, aside from local councillors who have a very specific and representative role.*

*We will not notify you of such applications being made.*



### 19.

All lap dancers have the right to be safe at work. Working for a company who cooperates with all authorities deserves the respect for conducting themselves in a professional, legal and with a responsible attitude.

I request you grant European Event Consultants Ltd application. Allowing all performers and all staff who work in Cheltenham during the Cheltenham festivals, including patrons of lap dance clubs the support we all deserve.

I'm making other performers and patrons of lap dancing clubs aware, that we have the right to voice our opinion regarding applications for a SEV each and every year.

I would request notification of any future SEL applications, the committee hearing not just being for objections who have been given this privilege.

### The Licensing team replied...

*Thank you for your email.*

*We do give notification to one body that promotes women and young girls' safety, this body works with the police and other agencies to help promote the safety of women and young girls. It seems appropriate to notify them of such applications, which they may be likely to miss if not so informed.*

*We notify the BID Team, as we consult with them on many applications that affect the town centre, and due to the partnership relationship, that we have with them.*

*We have refused further requests to notify other persons and/ or groups for the following reasons: -*

- We believe that notifying the above groups is sufficient to allow both local businesses and representatives of groups that promote women and young girl's safety to be informed of such applications, without an undue burden on the authority.*
- We do not believe that there is a similar need to notify those persons/ bodies that might support an application, as the number of letters/ emails of support suggests that the level of awareness of such applications being made is already very high. We regularly receive a high number of such comments from performers, workers at the venues, customers and others known to the applicant which suggests that it is not necessary for us to do this.*
- We do not consult with or notify any individuals of an application, aside from local councillors who have a very specific and representative role.*

*We will not notify you of such applications being made for these reasons.*

### 20. No address provided

### 21.

Myself and others have worked in Cheltenham during the Cheltenham Gold Cup in March at various venues.

I would confirm my support for Steven Burrows and the Eroticat dancers granting of a lap dancing licence application.

Regulating and a controlling SEV's in Cheltenham during March racing events gives Cheltenham's visitors and workers alike who travel and attend March events where the population and night-time economy grows to the size of a small city the peace of mind that public safety is take seriously.

Removal of the here today gone tomorrow clubs of years gone by being a very positive course of action.

I would like to support the granting of this licence.

### **22.**

I have worked in Cheltenham when it is the Cheltenham gold cup event on numerous occasions at different venues, therefore I am for this SEL application to be granted.

I would like to give Steven Burrows my full support during this application.

Working in a venue which complies with all working regulations and a controlling SEV's during the March racing event in Cheltenham, this means that it gives visitors and workers alike who travel and attend March events a peace of mind that the public are safe.

Pop up lap dancing venues are a thing of the past which is a positive as all workers, visitors and public are safe.

My support is fully for the granting of the licence for SEL.

### **23.**

A Sexual entertainment licence renewal granted over the Cheltenham racing festivals 2024 with all the restrictions & conditions imposed by the committee provides visitors to SEL venues in Cheltenham reassurance and performers the protection from exploitation and the safe working environment.

Public safety is paramount.

### **24.**

I would like to support this application and Steven Burrows.

I am for this application as they are putting people's safety first by complying with all the rules and regulations requested. I view this as a positive for Steven Burrows' company to be working to ensure that staff, public and visitors are safe during the town centre during this busy time in Cheltenham.

Thank you for your time.

### **25.**

Having worked for Mr Steven Burrows over several years as a receptionist at his lap dancing events including the Cheltenham March & November events every year.

Myself and my work colleagues given the choice much prefer working for Mr Burrows at licenced SEL. Having worked at Under the Prom would like the opportunity to remain at the venue for the duration of the full week.

I feel safer working at a licenced club then a pop-up club I would like to give my full support for the SEL application Under the Prom Cheltenham.

**26.**

SEL application UNDER THE PROM Cheltenham 2024 As Cheltenham resident I would like to express my full support again regarding the application of a SEL to operate during the Cheltenham horse racing festivals 2024.

I would support any SEL application in my opinion providing a far greater level of safety for all avoiding the possible exploitation of all performers.

The question licenced or unlicenced? if you are interested with the safety of performers (female) the answer must be licenced and regulated. unlicenced could put performers at a greater risk.

**27.**

Every individual woman has the right to their own views and opinions. If they chose to work in the adult entertainment industry that is their choice. Without receiving discrimination or criticism from the media with unfounded accusations anecdotal comments.

The Cheltenham borough Council duty of care is to provide the safest working environment for dancers and members of the public Cheltenham 2024.

I give them my support to the granting of this application and thank you for taking the time to reading my email.

**28.**

I would like to support the ladies, with this licence, to enable them to work in a safe regulated place of work.

I was very surprised to read in Glos live, that the vicar from the Baptist church in town is so judgemental as a Christian.

I have been a member of St Gregory's Church for sixty years & i have never heard a man of the cloth, judge anyone, we are all god's creatures, even Jesus didn't judge Mary Magdelin. He does not represent myself as a Christian.

**29.**

Is it not best to control lap dancing during Cheltenham in March?

If all guidelines and restrictions can be enforced to make lap dancing a safe place to work and visit, why go back to the pop-up clubs created by the high demand for lap dancing in March?

I respectfully request the committee control and grant the application for UTP.

**30. No address provided**

**31.**

A venue who is applying for a licence to ensure that every rule and regulation is being met is nothing but positive in my point of view.

Dancing performers are peoples' jobs, this is what they choose to do for a living? People objecting against this as it isn't their preferred job title is unfair for the dancers.

I would like to see this application granted, wish all the dancers and staff all the best.

**32.**

I am writing to you this evening to give my support for the SEL licence for the application due for March 2024.

I have given my support on previous occasions and my support still stands as it did before. Being in a licensed premises is safer for all those that are involved, meaning the public, staff, and dancers. This gives those that attend or work at the venue a piece of mind that we are safe.

Thank you for your time.

**33.**

I am in support of the licence application that has been submitted for Lap Dancers to attend Under the Prom in Cheltenham.

I personally do not see any reasons that there should be an objection for the application. Cheltenham's busiest time of the year is Cheltenham Racing Festival in March, we have a venue here that is applying for the licence which means that they are complying with all the rules and regulations that is requested. This means that it is a company which have a lot of respect for their staff and reputation as a company.

Look forward to hearing from you.

**34.**

I feel the need to support the SEL application for Under the Prom, Promenade, Cheltenham GL50 1NW.

SEL is the best way to control the relevant entertainment.

Dancers and patrons are all in favour of SEL clubs! No dancers no customers, no exemption ruling, or underground clubs become history.

Thank you for taking the time to read my email in support of an SEL we all way come up to the races in march and November and are all treated with great respect and the club always run very well and the staff are all courtesy and professional .staff we have been coming for last five years as an individual you have my full support in granting the licence on this venue SEL for under the prom. GI50 1NW.

**35.**

I would like to reiterate my support for a regulated lap dancing club /sex entertainment licence SEL Regulated being positive and unregulated a negative during the Cheltenham Festival dates in 2024 common knowledge most Cheltenham residents avoid the town centre in March festival week , which does include daytime with the behaviour of some individuals that the Cheltenham festival attracts not the lap dancing club Blaming all bad behaviour on any venue hosting lap dancing is total stupidity. Any measures that can assist Gloucestershire Constabulary with the control on the streets

of Cheltenham is a positive. If this entertainment is not for you don't go. Its only for 4/5 days simply don't go.

I support this application for SEL Under the Prom March 2024.

### **36.**

Lap dancing and Cheltenham horse festival meetings

Granting the renewal SEL at under the prom is the most practical option for Cheltenham council's ability to make sure the venue is in a good state of repair with the correct working conditions for the safety of lap dancers and customers.

Granting the licence for the safety of dancers and customers.

### **37.**

A regulated SEL being a positive and unregulated a negative during the Cheltenham festival dates in 2024.

People from Cheltenham avoid the town centre and racecourse during March Festivals, this is because of the behaviour that festival attendees bring to the town.

Any measure that assists the Cheltenham Police with the control and safety of Cheltenham Town Centre during this time is a positive.

The requested application for the SEL should be approved.

### **38.**

Sexual entertainment license support

I have worked in the security industry for many years which includes Cheltenham through the year and especially during race festivals holding a full SIA license.

In my professional opinion a sexual entertainment licence with all the license restrictions & conditions put in place by the licensing section during the March and November 2024 race festivals, highly reduces the risk to customers and the dancers alike.

### **39. No address provided**

### **40.**

Having stated before, I travel every year to Cheltenham in March for the Gold Cup and for the November meeting without fail from Ireland. These Cheltenham race meeting being unmissable for my wife and friends.

We have stayed in Cheltenham at the same hotel and use the same bars and finish the night at the Eroticats club by choice, a club which is not just full of drunken men.

My wife and friends and I would all confirm our support with the much-needed alternative entertainment which we all enjoy when in Cheltenham especially after a day on the racecourse.

**41. No address provided**

**42.**

March for the Gold Cup 2024 and Lap dancing in Cheltenham

I was informed on my last visit to Cheltenham in November, for the plans at Under the prom 2024, with applying for the SEL renewal for the coming year in partnership with Eroticcat.

A licensed at Under the Prom gives a me the knowledge being a properly run club, any problems the police. I know the owners and the dancers are vetted.

As a former resident of Cheltenham now living in Yorkshire, I would like to give you notice to include me in all future SEL applications!

SEL Supporting the application.

**43.**

Hello, I'd like to express my support and speak at the hearing for this license.

Thanks

**44.**

To whom it may concern,

I want to make it known I'm in full support of the licensing of under the prom to provide sexual entertainment for race meets and I'd like to speak at the hearing for this license.

**45.**

To whom it might concern

I want to show my support for the venue Under the Prom with Eroticats. When there is a chance, I would like to speak up to show my support.

**46.**

To whom it my concern

I would like to state my support for the licensing of "Under the Prom " with Eroticats. I would like to speak in support of the license when there is an opportunity to do so.

**47.**

Nationwide promotions company based in Bristol.

Every year I supply promotional staff to venues in Cheltenham Spa and during festivals for Mr Steven Burrows and his dancers.

I have found Mr Steve Burrows as an organized and very professional operator with his proactive approach regarding health & safety towards customers and members of staff. Which includes a

training program in partnership with GRASAC prior to the March festival 2023 with my staff in attendance. On numerous occasions Griffin promotional staff have assisted with lone females calling the Eroticats courtesy bus returning them to their accommodation, contacting the police and allowing access to the use of their phones assisting with giving directions in and around Cheltenham.

Mr Steven Burrows having worked with yourselves, and the Gloucestershire police appears to be a successful approach to providing a partnership that benefits Cheltenham night-time during festivals. All parties should receive credit for the professional and proactive attitude towards SEL Management in Cheltenham, with Mr Steven Burrows increasingly popular club with both males and females.

I'm supportive of the granting of any licence which improves the safety of all genders either being a member of staff or customers attending Cheltenham festivals.

**48. No address provided**

This page is intentionally left blank



Designated Permitted Area (shaded)

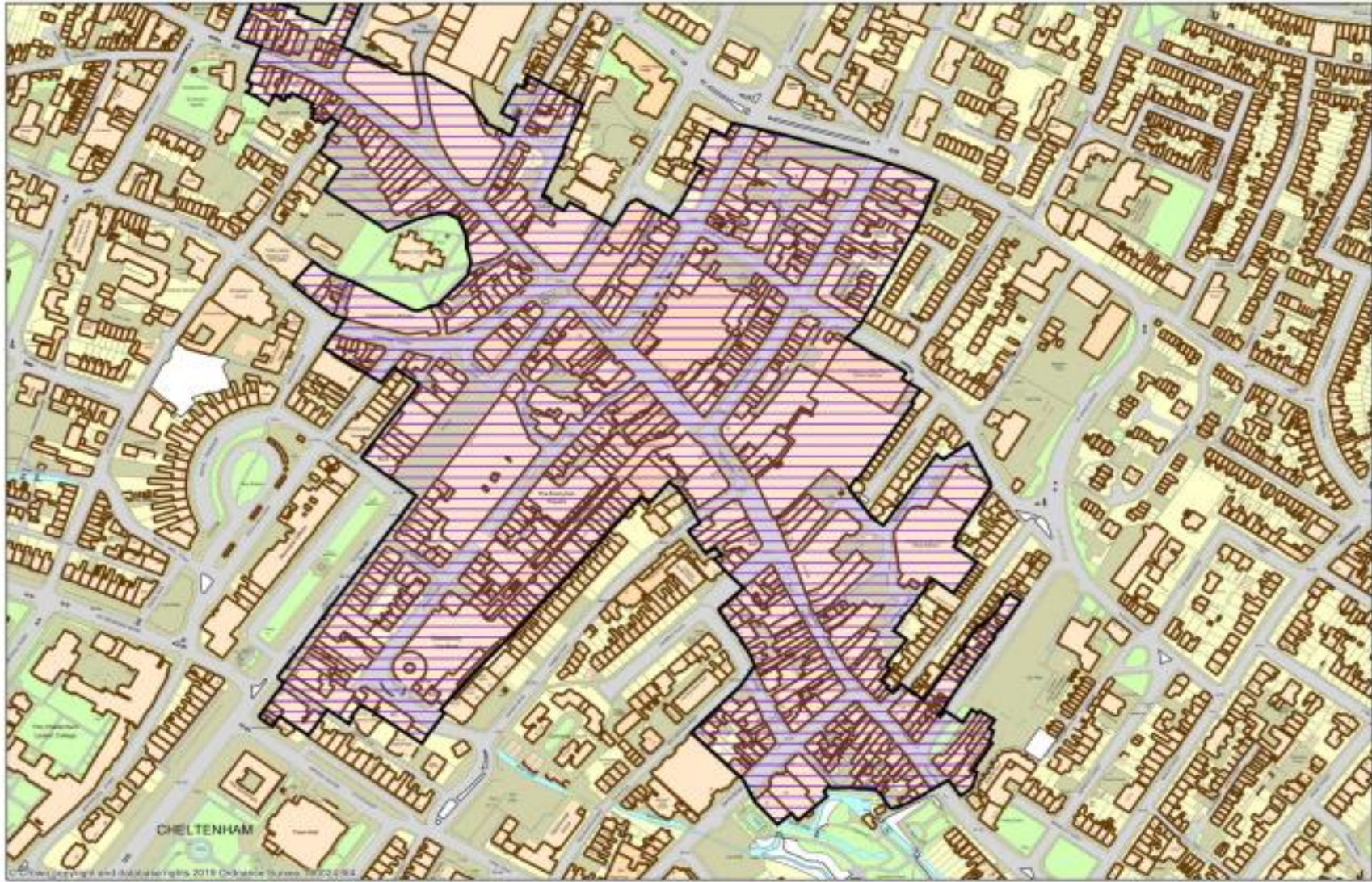


Fig 1 – Designated Permitted Area (shaded)

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank



Document is Restricted

This page is intentionally left blank