

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.



