

# Review of Sexual Entertainment Venue Licensing Policy

## Equality Impact Assessment

### STAGE 1 – Equality Screening

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#### 1. Identify the policy, project, function or service change

<b>a. Person responsible for this EqIA</b>	
Officer responsible: Michelle Bignell	Service Area: Public Protection
Title: Licensing and Public Protection Manager	Date of assessment: May 2026
Signature:	

<b>b. Is this a policy, function, strategy, service change or project?</b>	Policy
If other, please specify:	

<b>c. Name of the policy, function, strategy, service change or project</b>	
Sexual Entertainment Venue Licensing Policy	
Is this new or existing?	Existing
<b>Please specify reason for change or development of policy, function, strategy, service change or project</b>	
Routine policy review.	

<b>d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?</b>	
Aims:	Regulation of licensed Sexual Entertainment Venues in accordance with statutory requirements.
Objectives:	
Outcomes:	

Benefits:	
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e. What are the expected impacts?	
Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	Specified in Full Equality Impact Assessment
Do you expect the impacts to be positive or negative?	Specified in Full Equality Impact Assessment
Please provide an explanation for your answer:	
Specified in Full Equality Impact Assessment	

**If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.**

f. Identify next steps as appropriate	
Stage Two required	Yes
Owner of Stage Two assessment	Michelle Bignell
Completion date for Stage Two assessment	May 2026

**STAGE 2 – Full Equality Impact Assessment**

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## 2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

### a. Research and evidence

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

1. A 2023 survey conducted by the local VAWG partnership group, surveyed women and girls about their safety in Cheltenham. This survey received 114 responses, with the majority of responses being from people who identified as female (92.09%), white (88.6%) and straight (82.46%). The age range of this survey varied, with most respondents being between the ages of 30-49 (44.74%), followed by 18 to 29 (35.96%). No one over the age of 75 answered and very few below 18 answered.

The biggest concerns from participants were feeling unsafe in areas such as Boots and during race week. There was also an alarming amount of people who experienced cat calling and wolf whistling. They emphasised that these acts felt extremely normalised and often women felt like there was no point in reporting incidents.

2. There is a general body of national and international research and evidence to point to:
  - the impact of sexual entertainment on the objectification of women and girls and the links to violence against women and girls; and
  - that particularly, women and girls, avoid parts of the town during horse racing events and locations where known SEVs operate.

For example (not exhaustive) "[License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres](#)", [Inappropriate Behaviour: Adult venues and licensing in London](#), Isabel Eden, [The Liliith Project 2007](#) & [Wright, P.J., Tokunaga, R.S. Men's Objectifying Media Consumption, Objectification of Women, and Attitudes Supportive of Violence Against Women. Arch Sex Behav 45, 955–964 \(2016\)](#). It is noted that the latter is an American study and the scope was specific to "sexual assault on college campuses" with reference to "frequency of exposure to men's lifestyle magazines that objectify women, reality TV programs, and pornography" rather than sexual entertainment.

Objector groups and organisations who work with victims have raised similar issues.

The "[Safe and Equal Bristol Report](#)" was published in 2021 by Safe and Equal Bristol - an umbrella group of Bristol-based stakeholders and professionals in the field of gender equality and sexual & gender-based violence (SGBV).

This report is principally aimed at responding to Bristol City Council's SEV policy review arguing for a "nil cap" approach. Nonetheless, the report highlights the negative impacts of SEVs on gender equality and the prevalence of male violence against women, presenting evidence that suggests that regulation of SEVs does not necessarily lead to increased safety for performers.

3. “Tighter regulation of lap-dancing clubs” - Policing and Crime Act 2009. 2009 Act implemented specifically because the Licensing Act 2003 was inadequate as a regulatory tool to safeguard local communities and regulate the industry.

4. Regulating Strip-Based Entertainment: Sexual Entertainment Venue Policy and the Ex/Inclusion of Dancers’ Perspectives and Needs

This research on the striptease industry that explores why key stakeholders (dancers) are excluded, and ways that inclusion in policy development is achievable. This form of erotic work has undergone increased attention from policy and regulatory officials in recent years with the introduction of a new licensing process as venues are categorised as Sexual Entertainment Venues.

The article will demonstrate how community and campaign group voices were heard over that of the dancers themselves, who were not consulted in the process of the legislative change. However, the article shows how small but significant interventions into policy development by direct work with stakeholders (here Licensing Committees and officers) can make steps towards an inclusion of dancer welfare and safety issues. Finally, we propose a set of principles that can ensure dancer and sex worker voices are included in policy consultation and decision making to ensure evidence-based policy making.

- One in four lap-dancers has a degree. Those dancers with degrees had not chosen dancing in place of a career in their chosen subject after university, but instead were combining it with other forms of employment or education. One third of women interviewed were using dancing to fund new forms of education or training.
- No evidence or anecdotes of forced labour or the trafficking of women.
- No evidence of lap dancing having connections to organised prostitution.

5. Crime and Disorder – There is no evidence to suggest crime and disorder is any higher at, or in the vicinity of, licensed SEVs. To date the Chief Officer of Police has not raised any objections to any SEV application because there have been no crime and disorder is any higher at, or in the vicinity of, licensed SEVs to warrant such an objection.

There is no crime and disorder data to indicate any sexual offences linked specifically to any licensed SEVs although it is noted there is evidence to point to a more general link associated with objectification of women and girls and the links to violence against women and girls. The council does not have any evidence indicating a link between locally licensed SEVs and links to violence against women and girls from customers.

6. Complaints – A number of complaints have been received by the authority relating to both the current licensed SEVs relating to breach of licensing conditions. These have been aired and considered in full by the licensing committee during regulatory hearings.

7. Races generally v SEVs specifically – Much of the evidence held by the authority particularly from the 2023 survey and committee minutes from objector groups relate to the nature of the town during racing events (when SEVs are also licensed).

It is acknowledged that the absence of licensed SEVs during racing events is unlikely to have a substantial mitigating impact on the “feel” of the town and the concerns objector groups and VAWG organisations have raised due to:

- The likelihood that SEVs will continue to operate unlicensed; and
- With SEVs, theoretically out of the equation, the races will continue to attract large numbers of people to the town that will see a continuation of the issues raised.

## b. Consultation

Has any consultation be conducted?

Yes – initial engagement sessions with key stakeholders: objector groups, religious groups, Gloucestershire Constabulary, Police and Crime Commissioner, operators and performers.

Second consultation that was run for a period of 6 weeks.

Describe the consultation or engagement you have conducted or are intending to conduct. Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

The Licensing Committee has undertaken initial engagement sessions with a range of stakeholders:

1. Objector groups
2. Police and Crime Commissioner
3. Cheltenham Inspector and police licensing PC
4. Religious groups
5. SEV operators
6. Representative of performers

In summary:

1. Objector groups and religious leaders have called on the committee to set a nil limit pointing to the evidence linking SEVs to violence against women and objectification. They have also pointed out that setting such a limit would be the right thing to do for the town and its people and will send the right message to the town's residents, visitors and businesses.

They raised concerns about the Licensing Committee's decisions that have gone against adopted policy particularly in relation to the location of SEVs to building with sensitive uses and watering down of conditions.

They acknowledged the "infrequent exemption" predicament and challenge but maintained a nil limit was appropriate. It was noted that the Licensing Act 2003 does afford some regulatory protections that will mitigate some of the concerns.

2. Police and Crime Commissioner – The police and crime commissioner also opposed the operation of licensed SEVs but preferred a public health approach as the solution recognising the wider issue of violence against women and girls and the factors that feed into this. Factors included the operation of SEVs and the objectification of women that comes from this.
3. Chief Officer of Police – on their behalf, the Cheltenham Inspector and police licensing PC preferred a licensed approach. They pointed out that there are no real crime and disorder concerns around licensed SEVs. This was in contrast to unlicensed SEVs where multiple incidents were observed so as physical contact between customers and performers, cash transactions, poor facilities for performers and lack of adequate safeguarding measures to protect performers leaving the venue at the end of their shift.

- Both the operators and performers' representative pointed to the fact that this was a lawful activity and undertaken fully licensed, open to scrutiny and completely by performer's free will.

It was pointed out that licensed and regulated activities gave performers assurance in terms of their protection and safeguarding.

The operator pointed out that regulation was extremely expensive, and the infrequency exemption created a situation where unlicensed operators were able to operate without these costs and risks.

The operator pointed out that they could operate unlicensed in that way they did previously but wanted to run a responsible business. However, if regulatory measures and costs increase, they may consider their position especially in light of the infrequency exemption and the unfairness this creates in competing with unlicensed operators.

- The second consultation sought views on the proposed Designated Permitted Area (DPA) covering the same area as the Purple Flag area and listed proposed sensitive locations. Many of the comments submitted were against the licensing of SEV's and respondents did not feel the need to increase the area.

### **3. Assessment**

#### **a. Assessment of impacts**

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Negative	There is anecdotal evidence (through application objections) that older people may avoid areas where SEVs operate. The authority holds no data or specific evidence of this.	<p><b>Nil limit</b> – It is not expected that a nil limit would see any significant decrease in the amount or frequency of sexual entertainment due to the statutory exemption. Therefore, a nil limit would not mitigate any equality issues that may arise for older people.</p> <p><b>No change to current limits</b> - The same potential equality issues arise from this option.</p> <p>This option would allow the authority to regulate sexual entertainment through its policy including any equality issues arising and consequential safeguards required.</p> <p>Regulation allows the authority to set conditions, operating time(s) and implement other measures that could mitigate these equality issues.</p>
	Younger People (16-25)	Negative	The same potential equality issues arise from this option.	<p><b>Nil limit</b> – It is not expected that a nil limit would see any significant decrease in the amount or frequency of sexual entertainment due to the statutory exemption. Therefore, a nil limit would not mitigate any equality issues that may arise for younger people.</p> <p><b>No change to current limits</b> – There is a risk that children (under the age of 18) could gain access to</p>

				<p>sexual entertainment venues operating unlicensed.</p> <p>There is evidence that, particularly women and girls, may avoid areas where SEVs operate because they feel unsafe in the vicinity of these venues.</p> <p>This option would allow the authority to regulate sexual entertainment through its policy including any equality issues arising and consequential safeguards required.</p> <p>Regulation allows the authority to set conditions, operating time(s) and implement other measures that could mitigate these equality issues. Specifically, this includes challenge 25, restricting displays and advertising that children may be exposed to and dictating hours of operation to mitigate access by children.</p>
	Children (0-16)	Negative	<p>There is a risk that children (under the age of 18) could gain access to sexual entertainment venues operating or be exposed to them in some other way or form.</p>	<p><b>Nil limit</b> – It is not expected that a nil limit would see any significant decrease in the amount or frequency of sexual entertainment due to the statutory exemption. Therefore, a nil limit would not mitigate any equality issues that may arise for younger people.</p> <p><b>No change to current limits</b> – The same potential equality issues arise from this option.</p>

				<p>This option would allow the authority to regulate sexual entertainment through its policy including any equality issues arising and consequential safeguards required.</p> <p>Regulation allows the authority to set conditions, operating time(s) and implement other measures that could mitigate these equality issues. Specifically, this includes challenge 25, restricting displays and advertising that children may be exposed to and dictating hours of operation to mitigate access by children.</p>
<p><b>DISABILITY</b> A definition of disability under the Equality Act 2010 is available <a href="#">here</a>.</p> <p><i>See also carer responsibilities under other considerations.</i></p>	Physical disability	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	<p>Premises where sexual entertainment takes place have a general duty to make reasonable adjustments to accommodate a range of disabilities.</p> <p>Legal redress is via civil action or enforced by the Equality and Human Rights Commission.</p> <p>Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to disabilities where, for example, complaints of discrimination has been received.</p>

	Sensory Impairment (sight, hearing)	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
	Mental health	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
	Learning Disability	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
<b>GENDER REASSIGNMENT</b>		Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	<p>The licensing policy position is gender neutral.</p> <p>Legal redress is via civil action or enforced by the Equality and Human Rights Commission.</p> <p>Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to gender or sexual orientation where, for example, complaints of discrimination has been received.</p>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	Women	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	

	Men	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	
	Lesbians	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	<p>The licensing policy position is gender neutral.</p> <p>Legal redress is via civil action or enforced by the Equality and Human Rights Commission.</p> <p>Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to gender or sexual orientation where, for example, complaints of discrimination has been received.</p>
	Gay Men	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
<b>PREGNANCY &amp; MATERNITY</b>	Women	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	
<b>RACE*</b> Further information on the breakdown below each of these headings, is available <a href="#">here</a> .	White	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	<p>The licensing policy position is non-discriminatory on race.</p> <p>Whilst the authority is not the principal enforcing authority, it is generally acknowledged that</p>

For example Asian, includes Chinese, Pakistani and Indian etc				through licensing regulation the authority has an increased ability to address issues relating to race or racial identity where, for example, complaints of discrimination has been received.
	Mixed or multiple ethnic groups	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
	Asian	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
	African	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
	Caribbean or Black	Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
		Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	As above.
<b>RELIGION &amp; BELIEF**</b> A list of religions used in the census is available <a href="#">here</a>	See note	Negative	Generally recognised that certain properties, or their uses, may be incompatible with the operation of sexual entertainment. This applies to building and premises used for religious purposes.	<b>Nil limit</b> – A nil limit may not mitigate these issues because it is expected that sexual entertainment will continue despite the policy position of nil.

			<p>The operation of sexual entertainment may mean people do not want/unable to visit buildings and premises used for religious purposes out of fear, feelings of safety or by objections to the activity.</p>	<p><b>No change to current limits</b> – The same potential equality issues arise from this option.</p> <p>However, licensed sexual entertainment would allow the authority to make placed based decisions based on the locality of licensed SEVs and the operating conditions to mitigate any equality issues arising in relation to buildings and premises used for religious purposes.</p>
<b>SEX (GENDER)</b>	Men	Neutral	<p>The most relevant data (2023 VAWG survey) indicated a very small response (&lt;8%) were from males suggesting there are no specific or general equality issues arising for this category of consideration.</p>	
	Women	Negative	<p>From local data (2023 survey) the majority of responses was from people who identified as female (92.09%), white (88.6%) and straight (82.46%). The age range of this survey varied, with most respondents being between the ages of 30-49 (44.74%), followed by 18 to 29 (35.96%).</p> <p>Most people felt unsafe during race meetings and football matches, with race meetings being the highest.</p> <p>When asked about behaviours experienced, in all locations a percentage of women had been victims of cat calling, which was usually the highest, closely followed by wolf whistling.</p>	<p><b>Nil limit</b> – The potential equality issues arising from this category will not be entirely mitigated by a nil limited because, as the data adjacent shows, the issues mainly relate to the general issue of races rather than specifically the operation of SEVs.</p> <p>It is also acknowledged that a policy nil limit would not result in sexual entertainment no longer taking place. There is evidence that operators will use the statutory exemption to continue to operate for the, up to, 16 days annually.</p>

			<p>Places with the highest reports where in the high street, pubs/ clubs, the street and the lower high street.</p> <p>Asked about unwanted behaviours, most places experienced low levels of unwanted behaviours but all had reports of it to some extent.</p> <p>There is no data locally to give a clear indication of any links relating to feelings of safety and/or violence against particularly women and girls at or in relation to SEVs. The data held and reported above relates more generally to the town during racing and in the general ENTE.</p> <p>There is anecdotal evidence (from objectors to applications and engagement sessions) that women and girls may avoid areas where SEVs operate thereby excluding them from part of the town for the duration of sexual entertainment venues operating.</p>	<p>Therefore, the potential equality issues arising could not be mitigated whilst the option to operate under the exemption exists.</p> <p>A further consideration is performers working SEVs. Locally, performers are exclusively female. Unlicensed sexual entertainment would not contribute to promoting equality because the unregulated environment would diminish their safeguarding and rights.</p> <p><b>No change to current limits –</b> The same potential equality issues arise from this option.</p> <p>However, licensed sexual entertainment would allow the authority to make placed based decisions based on the locality of licensed SEVs and the operating conditions to mitigate any equality issues arising.</p>
Trans Men	Neutral		<p>The most relevant data (2023 VAWG survey) indicated a very small response (&lt;8%) were from males suggesting there are no specific or general equality issues arising for this category of consideration.</p>	<p>The licensing policy position is gender neutral.</p> <p>Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to gender or sexual orientation where, for example, complaints of discrimination has been received.</p>

	Trans Women	Negative	Generally, as per the above (“Women”).  There is no data to link any particular issues in relation to specifically Trans Women but the general equality issues as they relate to women are likely to apply.	Generally, as per the above (“Women”).
<b>SEXUAL ORIENTATION</b>	Heterosexual	Neutral	The most relevant data (2023 VAWG survey) indicated a small response (12%) from people who did not identify heterosexual suggesting there are no specific or general equality issues arising for this category of consideration.	The licensing policy position is gender neutral.  Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to gender or sexual orientation where, for example, complaints of discrimination has been received.
	Lesbian	Neutral	The most relevant data (2023 VAWG survey) indicated a small response (12%) from people who did not identify heterosexual suggesting there are no specific or general equality issues arising for this category of consideration.	As above.
	Gay	Neutral	The most relevant data (2023 VAWG survey) indicated a small response (12%) from people who did not identify heterosexual suggesting there are no specific or general equality issues arising for this category of consideration.	As above.
	Bisexual/Pansexual	Neutral	The most relevant data (2023 VAWG survey) indicated a small response (12%) from people who did not identify	As above.

			heterosexual suggesting there are no specific or general equality issues arising for this category of consideration.	
<b>Other considerations</b>				
<b>Socio-economic factors</b> (income, education, employment, community safety & social support)		Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	<p>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.</p> <p>As such, this is a form of employment and income for both operators and performers. There is also acknowledgement of the wider economic impact of sex establishments as businesses that attracts people to the town and the spending that comes from this.</p> <p><b>Nil limit</b> – It is not expected that a nil limit would see any significant decrease in the amount or frequency of sexual entertainment due to the statutory exemption.</p> <p>To this extent, the impact on employment and/or income opportunities for both operators and performers would, potentially, be limited.</p> <p>However, in an unregulated scenario (under the infrequency exemption) there is the potential for increased risk of operators not treating performers fairly by, for</p>

				<p>example, draconian rules, fees, penalties and not upholding fair and good employment practices and protections.</p> <p>There is also a risk of poor customer protection and fair treatment by unlicensed operators.</p> <p><b>No change to current limits -</b>          Whilst the authority is not the principal enforcing authority, it is generally acknowledged that through licensing regulation the authority has an increased ability to address issues relating to protections for performers and customers where, for example, complaints of discrimination has been received or there is evidence of poor and discriminatory practices by operators.</p>
<p><b>Rurality</b>          i.e. access to services; transport; education; employment; broadband</p>		Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	
<p><b>Other (e.g. caring responsibilities)</b></p>		Neutral	The authority holds no data, including anecdotally, to suggest there are any specific or general equality issues arising for this category of consideration.	

\* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

\*\* There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

#### 4. Outcomes, Action and Public Reporting

- a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer

- b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

#### 5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

#### 6. Change log

Name	Date	Version	Change

