

1. Response 1

Thank you for inviting me to respond to Bristol City Council's SEV policy review.

I urge the council in the strongest possible terms to implement a nil-cap on SEVs in all areas of Bristol with immediate effect. This would be in accordance with the council's repeated claims to be committed to gender equality.

Implementing a nil-cap would send a very strong message to all Bristol residents, and to other towns and cities across the UK, that SEVs have no place in contemporary societies that are moving with the times and recognising that sexism and violence against women is completely unacceptable, and absolutely should not be licensed and therefore endorsed by councils. Going into 2017, we should not be putting out the message that women's bodies are available to be bought on the high street by men with the money and power to do so.

As a journalist of 15+ years, I can appreciate that the council may be reluctant to incite the predictable, hyperbolic stories that the Bristol Post, Bristol 24/7 and other local media may sink to in response to you implementing a nil-cap. These news outlets are all edited by men whose businesses thrive not on the reporting of news but on generating website hits to keep their advertisers happy. And inevitably any story that can be illustrated with a photograph of a young woman in scant clothing will generate the hits these websites want.

These news outlets also have a long history of pitting one type of woman against another (eg women who campaign for gender equality against SEV workers). And despite the scuffles generated by the local papers, these stories also blow over very quickly to be replaced by tomorrow's news stories. So any negativity the council might experience from the local media in response to you implementing the nil-cap Bristol needs would be very short-lived, and the benefits to Bristol and to the council would be seen for decades to come and would be much more far-reaching and influential.

Additionally, Bristol would be cited as a good example of a city that took the brave and courageous step of standing up to pressure, and implemented a nil-cap. This has been evidenced in other local authorities where nil-caps are already in effect and the cities and councils are already enjoying the plentiful benefits.

2. Response 2

Thank you for your letter regarding the above review. I welcome your asking for feedback at this early stage in preparing a draft policy for consultation and am pleased to offer my thoughts.

I have general rather than specific comments on sections of the policy as my view is that the policy should be completely revised to state that there should be no SEVs in Bristol. There should not be any SEVs and those that currently operate should no longer be granted a licence so that none remain.

My main reason for proposing that there be no SEVs in Bristol is that having SEVs in the city runs directly counter to promoting equality between men and women. SEVs reinforce in men (and also in women) the attitude that women and men are unequal in that access to women can be bought by men and that men are entitled to treat women as they wish. Women are thus treated as objects, dehumanised and seen as lesser to men. This extends to women as a group and not just the specific women that men meet in the SEVs.

The Council must consider the aims of the public sector equality duty (PSED) when formulating the new policy on sexual establishments. Where the aims of the PSED are to advance equality of opportunity and to foster good relations between men and women then there can be no other conclusion than to have a policy of no SEVs in Bristol.

The Council must seek views from experts in the field of gender equality such as academics and public health specialists and must understand the evidence for the negative impacts of SEVs on gender equality in order to properly research the PSED implications of this policy review. I hope that you will now do this next step in developing your thinking on the new draft policy.

A further reason for revising the policy at this time to not have any SEVs in Bristol is the distinct change in the character of the city centre this year since the conversion of so many city centre buildings to residential property. There are several thousand more residents in new building conversions such as Electricity House and the nearby new student accommodation. SEVs have never been seen as appropriate in residential areas and as the city centre has now become very much a residential area it is no longer appropriate for SEVs to be present there.

3. Response 3

Thank you for the opportunity to comment at an early stage as you prepare a draft policy for approval by the Licensing Committee.

About me and my work

My name is (redacted), I am a Bristolian and a gender equality consultant. I have a PhD in Psychology from the University of Bristol, on how and why sexual harassment happens to women. I work in the fields of gender equality, and the psychology of social change. I have worked at the Universities of Bristol, Lancaster and most recently UWE where I spent two years developing an evidence-based programme to change social norms at English universities, in order to prevent rape, sexual assault and sexual harassment. My work on the programme was commissioned by Public Health England. I am a member of the national End Violence Against Women Coalition and was appointed in 2015 to the national High-Level Task Force on violence against women in universities commissioned by Sajid Javid MP and Jo Johnson MP. For 6 years I was on the board of directors of The Fawcett Society, the UK's national campaign for equality between women and men. My most recent publication, with colleagues, was an evaluation of how the UK nations are performing in legislation, policy and practice, against the United Nations Sustainable Development Goal for gender equality. In that comprehensive [report](#), available from the British Council website, over 30 gender equality specialists and experts were interviewed in depth and over 400 research reports were digested by the research team. A headline conclusion was: "Like all countries, there is still more work to do in the UK: for example, to change sexist cultural norms about gender that demean women, that are supportive of male violence and that act to limit the horizons of women and girls" (p5).

My response to the policy review

I advise the working group to set a cap of zero in each locality of Bristol for Sexual Entertainment Venues. This will promote equality between women and men in the city and

it will contribute to a change in culture – a culture that is currently supportive of discrimination, harassment and violence against women and girls as data show. Such violence is currently the largest human rights abuse worldwide, and it is not inevitable. It is preventable. The culture is not solely influenced by what goes on inside SEVs but also by the message sent by the local authority that until now has permitted the licensing of SEVs and their presence on the high street.

It seems obvious but it is a distinction worth repeating that:

- inequality between men and women is not fuelled by sex difference, sexual attraction or sexual activity engaged in by individual, consenting, equal adults for the purpose of pleasure for both parties

But:

- inequality between men and women, that includes men's social norms of disrespect, harassment and violence towards women as a group, **is** fuelled by sexual activity that is in the public domain of society, involving (almost always) men paying to have access to, objectify and dictate the performance of the bodies of (almost always) young women where the customer alone is expected and entitled to obtain pleasure.

The history of Bristol's policy is not an impressive one. At the time the last policy was written, gender equality stakeholders (including but not limited to people whose work is to understand how and why violence against women is so common in our culture) contacted the chair of the Licensing Committee with requests to **set a nil cap for SEVs**, as is perfectly allowable under the law. The University of Bristol's Centre for Gender and Violence Research very kindly arranged an information seminar at which several such knowledgeable persons gave presentations explaining how the existence of SEVs in itself is a powerful cultural signal in support of sexism. In this short submission I will not attempt to give a long description of how and why this is judged to be the case but I will be glad to do this if the working group would find it helpful. I refer you also to the longer submission by Bristol Fawcett which provides some research references and which should be useful in drawing up an Equality Impact Assessment. At the time of the last review, one single member of the Committee (who then supported a nil cap) attended the information seminar. No other members, nor the chair, nor any officers, attended - although the chair had been offered three alternative dates - and an opportunity was lost. Members of the Public Health team in Bristol, whose role was to help prevent violence against women, were told they were unable to offer their view as trained specialists in prevention *because of* their role as public servants. Later, the policy was decided and a cap was set at 3 SEVs. At the meeting in November 2011 where this policy was decided, there were concerning comments made, resulting in a letter to the then chair of the Committee, from the Chair of Bristol's Strategic Partnership for the Prevention of Violence Against Women and Girls (a copy of this letter is attached for information).

It is therefore with great feeling that I welcome the opportunity to advise the working group at this stage, in the 2016/17 policy review. In short:

- The working group may set policy taking into account representations from local residents and representative groups

- The working group may take advice on the potential adverse or positive impact of policy upon specific groups (in this case, a particularly large group – women and girls) from those who are most familiar with the challenges faced by that group.
- The working group may reflect on the degree of care taken by numbers of experts in the area to contribute to its deliberation on this particular policy area: care taken because it is judged in their view to be a meaningful, important issue in the field and whose resolution represents a significant shift in promoting equality and preventing violence.
- I hope that the working group will decide that a weight of objective, credible, authoritative information (as opposed to simply ‘opinion’) has been provided, which explains that SEVs make a negative impact upon the chances that Bristol’s women and girls have for making progress towards equality with men and boys, equal enjoyment of the city and safer lives.
- I hope that the working group and the Licensing Committee share the vision for a 21st-century city where women and girls are the equal of men and boys in every way and that they seek to prioritise this vision.
- I trust that the working group will therefore produce a draft policy reflecting this process, that will set a cap of zero SEVs in each locality.
- I will be pleased to assist with providing evidence, for example from peer-reviewed academic journals, to assist in any decision making and in any Equality Impact Assessment. The Equality Impact Assessment from 2011/12 appears to indicate that further Equality Impact Assessments would be made with each application but this has not happened in practice.

Please do not hesitate to contact me for any further information.

“The right to equality is not subject to progressive realization, it is an immediate obligation ... to ensure that women are able to enjoy their right to equality” Mayra Gómez, Co-Executive Director of the Global Initiative for Economic, Social and Cultural Rights

4. Response 4

Thank you for giving me the opportunity to respond to the preliminary consultation on the Sex Establishment Policy Review, 2016-17. As someone who has been concerned about SEVs for many years, I am grateful for the invitation to comment on what might be included in the new policy.

It is my hope that the Licensing Committee will take this opportunity to include a nil cap in its revised SEV policy. Bristol City Council, along with many other cities, now has the chance to bring its SEV policy in line with its obligations under the White Ribbon Status which it was awarded in 2013. The White Ribbon Status marks a commitment to ending violence against women.

There are numerous reasons why a nil cap is desirable, many of which no doubt will be covered in other consultation responses. In my response, I would like to concentrate on the benefits to the local economy of refusing SEV licences.

During licence applications and policy reviews, it is posited by those with a vested interest that SEVs contribute to the local economy and that the performers will lose their employment if a licence is refused. I would suggest the opposite; that a different kind of establishment would contribute more to the local economy and that a performer would arguably have better employment opportunities and rights if a premises and alcohol licence alone were granted.

The reasons for this are as follows:

- The performers are not employed by the club, but are self-employed. Work is ad-hoc and performers pay a house fee to work in the club.
- If refused a SEV licence, a club would still retain its alcohol/premises licence. It could therefore operate as a restaurant and/or bar and offer the performers more regular employment with associated rights that they do not currently enjoy. The argument that performers would automatically lose their jobs is therefore false. The loss of one type of ad-hoc, often inadequately recompensed work could be substituted for more regular employment.
- Because the premises licence is retained, a new business could open that doesn't effectively exclude 50% of the population. Pata Negra on Corn Street is a highly successful tapas bar that was once Lounge@30, a sex entertainment venue. It is no doubt more lucrative and contributes more to the local economy than a SEV which caters for a very niche market.
- Market trends are showing that the demand for lap dancing clubs is decreasing. Despite many clubs' attempt to normalise their existence and market themselves to couples, their main clientele are men. Research is showing that members of stag parties – the staple market for lap dancing clubs - are moving away from spending time in lap dancing clubs to other doing other less “seedy” activities . It has also become unacceptable for most companies to use lap dancing clubs for corporate entertainment because it is seen as unethical and discriminatory.
- Policing SEVs consumes police resources. Even if the clubs claim to be 'well run', they have to be monitored on a regular basis for licence breaches, links to people trafficking, drugs etc. In 2012, Newquay Town Council reported that one reason why crime in the town had reduced by a quarter was that a lap dancing club which had continually breached its licence conditions had had its licence revoked . It must be weighed up as to whether the little that the clubs contribute to the local economy offsets the disproportionate amount of policing required to ensure compliance with licence conditions. Research in America has shown that sexually oriented businesses (strip clubs and sex shops) are clearly associated with increased rates of all types of crime in their immediate vicinity.

In 2011, to a huge outcry, the Licensing Committee missed the opportunity to turn down a premises licence applied for by 'Hooters', a 'sports bar'. This semi-SEV thankfully did not last very long in the city and, like Pata Negra, is now also a popular restaurant and bar (The Cuban). It is unthinkable now that such a licence would be granted again and it is hoped that the city has moved on from endorsing this type of establishment. The Committee will

remember receiving a letter from the Chair of the Safeguarding Children Board in Bristol about "sexy schoolgirl" promotions in Urban Tiger recently. Years ago, this type of sexualisation was a routine part of our culture and may not have even raised an eyebrow but it is now recognised as wrong and harmful. I think Bristol is now ready to recognise that endorsing SEVs is also wrong and harmful, and that our city does not want to be associated with practices that were once accepted as normal even though they demeaned women and men.

5. Response 5

In the last review of this policy in 2010/2011 I made a personal representation and the Centre which I currently head, also made written representations to the council to have a policy that the appropriate number of sexual entertainment venue's in each locality of Bristol is zero.

I hope that my own personal expertise on the prevention of violence against women, as well as the considerable expertise of my colleagues in the Centre for Gender and Violence Research might be of assistance to you as you fulfil your Council obligations to consult under the Equalities Act 2010.

We believe that in order for the city of Bristol to address inequality and violence against women, that the working group draft a policy setting a cap of zero SEVs as an appropriate number for each locality of Bristol.

6. Response 6

I am a Bristol GP and gender violence researcher based in the School of Social and Community Medicine at the University of Bristol. I chaired the NICE DVA and the WHO intimate partner and sexual violence guidelines.

During your last review (2010/11) I supported a policy of zero sexual "entertainment" venues in Bristol.

As a locally based expert on gender violence (with an international research and policy profile), I would like to make the case that a policy of 0 SEVs would make a substantial contribution to Bristol Council's duty to reduce inequality and violence against women.

7. Response 7

Thank you for the opportunity to be consulted on the review. I have written to you previously of my objections to the granting of a SEV licence to Urban Tiger.

I urge the council to set a cap of zero as the appropriate number of SEVs in each locality of Bristol, in order to promote gender equality and to do everything in its power to change the sadly dominant culture of men's violence against women in Bristol, which is fuelled by SEVs.

I am aware that during the history of many of the SEVs in Bristol, breaches of licence policy and poor practice have repeatedly been identified. For example, advertisements for "sexy schoolgirl" nights sexualising children, advertisements encouraging men to lie to their wives about going to SEVs, constructing and permitting private booths, failing to ensure appropriate levels of CCTV coverage, failing to stop touching between dancers and customers during dances, failing to ensure privacy for performers. During hearings, lawyers for the clubs routinely apologise on their behalf and promise that this kind of thing will not happen again. However, this is a pattern. It shows that as long as the council continues to issue licenses, it is likely that there will continue to be breaches and poor risk management. This is the nature of the SEV trade and our city will be much better off replacing the SEVs with businesses that do not trade on men's use of women's bodies for paid entertainment.