

Public Forum

Licensing Committee

28 July 2022



1. Members of the Licensing Committee

	Questions
Number	Name
1	Margaret Page
2	Safe Equal Bristol – not attending
3	Penny Gane
4	Stephanie Poyntz
5	Bristol Women's Commission
6	Bristol Women's Voice
7	Clare Meraz
8	Laura Williams
9	Katy Taylor
10	Amanda Gosling

Statements	
Number	Name
1	Martyn Howlett
2	John Morse Solicitors
3	Councillor Carla Denyer
4	Hollie Gazzard Trust – S Poyntz to summarise
5	JF – S Poyntz to summarise
6	Amelie
7	National Ugly Mugs
8	Remmi
9	Simon Curtis - Equity
10	Amnesty Bristol Group
11	Annie McGann – Save Bristol Nightlife
12	Tay Xperia
13	Safe Equal Bristol – P Gane to summarise
14	Penny Gane
15	Bristol Women’s Commission – Penny Gane
16	Clare Meraz
17	Helen Mott – P Gane to summarise
18	Councillor Ani Stafford - Townsend
19	Joanne Page – UNISON SW – P Gane to summarise
20	Danica Priest
21	Decrim Now
22	United Voices of the World
23	Jeanette Plumb – St Stephens Church Warden – S Poyntz to summarise
24	Katy Taylor – Bristol Women’s Voice
25	Laura Williams – P Gane to summarise
26	Fair Play South West - Margaret Page – P Gane to summarise
27	United Sex Workers
28	Scarlett
29	Bristol Sex Workers Collective
30	Layla
31	S
32	VR – Katy Taylor to summarise
33	R – Katy Taylor to summarise
34	Police and Crime Commissioner - Mark Shelford
35	Not Buying it – K Taylor to summarise
36	LF – Clare Meraz to summarise
37	Julia Stafford
38	J – Katy Taylor to summarise
39	Chris Green – Bristol Women’s Voice to summarise
40	Phoenix
41	BARBI
42	Dr K Cruz
43	Councillor Helen Holland

44	E – S Poyntz to summarise
45	GH – Clare Meraz to summarise
46	Argaman – Israeli Sex Workers Alliance



I would like to submit the following question to the council, and licensing committee:

"Why does the Equality Impact Assessment suggest that SEVs have a 'positive impact' regarding the protected characteristic of sexual orientation when there is no credible evidence of this when it comes to lesbians?"

Your consultation response clearly demonstrates that your EQIA is unsupported by the data.

EQIA: Sexual orientation Does your analysis indicate a disproportionate impact?

Yes No Potential impacts: Some respondents commented that the SEVs are welcoming because they are sex-positive and provide a safer space for LGBTQ+ and other marginalised communities.

Consultation response: When looking at the breakdown by sexuality it can be seen that gay women/lesbians were more likely to say they feel safer with **no** SEVs in the area than other groups (20%). Gay men are least likely to say they feel safer with **no** SEVS (5%).

best regards,
Margaret Page

Response

The EQIA references comments made which are contained within restricted appendices and therefore not available to the public where commenters stated that they felt SEVs provided a safe space for LGBTQ+ and other marginalised communities. The statistical data in the consultation report has a short analysis in relation to the data but should be read in conjunction with the graph and the other information submitted to the committee. In addition to 20% of gay women/lesbians saying they felt less safe, 20% said they felt safer and 62% said there was no impact.

Written questions from Safe and Equal Bristol sent to democratic.services@bristol.gov.uk re the published documents for the meeting of the Licensing Committee at 10am on 28th July 2022

Questions to the committee concerning the proposed draft policy as published: Appendix 17 – Standard Conditions

- 1) Advertising. Could the Committee take this opportunity to (?further?) discuss/amend the text - **or clarify why this draft does not include the text:** “For the avoidance of doubt it shall be the responsibility of management to oversee / sign off on all advertising?” This is important because in the past, licensee lack of oversight of their SEV’s marketing methods and content was used as an excuse after Bristol venues were challenged for advertising “sexy schoolgirl” nights (performers dressing up as schoolgirls) in years gone by as documented in the Safe & Equal Bristol report.

- 2) Advertising. We note that this draft does not adopt the language that we suggested in our consultation response: “Advertising shall not promote the sexual objectification of women”. Could the committee take this opportunity to (?further?) discuss/amend the text - or clarify its position: **does it accept that a licensed SEV is welcome to use advertising that promotes the sexual objectification of women? Yes/No**

- 3) Promotion of unlawful conduct. We note that this draft, at paragraph 31, excludes conduct that if taking place in reality would amount to a criminal offence (including performers dressing up as schoolgirls, a practice which was previously embraced by Bristol SEVs). Could the committee take this opportunity to (?further?) discuss/amend the text so as to exclude “conduct which includes any word, action or imagery that endorses or depicts, or might reasonably be taken as endorsing or depicting, or be promoted as including, any conduct which, if taking place in reality, would amount to unlawful conduct” in order that sexual harassment is clearly proscribed? Alternatively could the committee clarify its position: **does it accept that conduct taking place in reality, such as unlawful sexual harassment, is permitted to be depicted within the licensing conditions? Yes/No**

- 4) The clarifying text (page 920) currently suggests that a wide range of sex-related activities, even if conducted from within a sexual entertainment venue whose core purpose is to provide sexual ‘entertainment’, would be unlikely to require licensing. Yet a glance at representative marketing for “life drawing” in the context of stag parties makes it clear that sexual objectification and sexual entertainment are very much the purpose of these activities in this context (e.g. <https://www.entertainment.co.uk/stag-party-ideas/life-drawing-stag-do>). Does the committee accept that events and

occasions with a potential sex-related element, advertised, for example, to stag parties, when conducted inside a licensed SEV, are in reality all matters amounting to sexual entertainment? Surely any reasonable person would have no difficulty in drawing this conclusion?

Response

- 1. Responsibility for compliance with conditions must always rest with the licence holder. Complaints about any future advertising can be made to the Council and the Advertising Standards Agency.**
- 2. Sexual objectification of women can be a subjective term, which it is considered does not translate into a legally enforceable condition.**
- 3. Unlawful conduct and criminal offence are interchangeable terms, sexual harassment is a criminal offence. The condition is sufficiently broad therefore does not need amending.**
- 4. The legislation defines relevant entertainment as being entertainment provided for the primary purpose of sexual stimulation. It is generally accepted that the primary purpose of life drawing classes is not for sexual stimulation, however where events did fall within the relevant entertainment category they would require licensing, and may fall under either an SEV licence, or the permitted exemption.**

The Police and Crime Commissioner for Avon and Somerset has written in support of a nil cap policy on sexual entertainment venues in the city. The police are key, expert providers, locally, regionally and nationally, in preventing male violence against women and girls.

What weight will the Licensing Committee give to the police response in arriving at a decision?

Penny Gane

Response

It is a matter for each member of the committee to determine what weight to give to the information provided, all of which will be considered before reaching a decision. The PCC has provided a public statement in his role as the PCC. No additional information has been submitted by Avon and Somerset Constabulary.

Dear Democratic Services

I would like to submit the following question to the licensing committee ahead of the meeting at 10am on the 28th July.

**What empirical, objective evidence has the licensing committee found, if any, that dancers will be forced to work 'underground' if a nil cap is implemented?
Has the licensing committee uncovered evidence from other cities that this has been the outcome of implementing a nil cap?**

Many thanks
Stephanie Poyntz

Response

There is no evidence from other comparable/core cities as they do not have a nil cap in place. There is no demonstrable evidence of this work going underground, however it remains a legitimate concern. Human trafficking, exploitation and 'underground' sexual entertainment are by their nature covert which means this would be unlikely to be recorded in an accessible way. This is therefore a valid concern.

Bristol educational institutions wrote a joint letter supporting the proposed nil cap on SEVs.

What weight has the committee given to this position, expressed by significant city partners who have key responsibility for young people's progress and welfare?

SEVs have previously advertised work as dancers to young female students, as a way to pay off student loans and they have targeted young male students with reduced price offers to attend. Given we know the pathway for many students who work in strip clubs is into further areas of the sex industry, what does the committee suggest our education institutions do to counter these harms and reassure parents as part of their welfare duties?

Penny Gane

Chair – Bristol Women's Commission

Response

It is a matter for each member of the committee to determine what weight to give to the information provided, all of which will be considered before reaching a decision.

Any welfare policies and actions in relation to students of further educational establishments is a matter for those educational establishments however they can seek advice and guidance through the Bristol City Council Safeguarding Education Team or the Keeping Bristol Safe Partnership and in the development of these policies and tools for quality assuring their effectiveness. Bristol City Council funds services for children and young adults experiencing sexual exploitation and services through Barnardo's BASE, including education establishments, can refer young people to this service or seek advice and guidance on assessing whether exploitation is thought to be occurring in any context.

Dear licencing committee

With reference to the upcoming hearing on the nil cap on SEVs, I would like to ask the committee the following question:

On page 8 of the draft proposed policy, it states:

“To promote consistency the Council will have regard to previous determinations and the policy determinations. However, applicants should be aware that there will be a general presumption for refusal especially where the characteristic of the locality is made up of primarily:

- residential accommodation,
- parks and children’s play areas,
- schools, nurseries, children centres, colleges, or university
- religious and communal buildings
- family tourist attractions
- family shopping or leisure areas
- transport infrastructure.

The policy as drafted states a general presumption for refusal “especially where the characteristic of the locality is made up of primarily” certain kinds of establishment, but when a “locality” is so widely drawn as to cover the entire city centre, there is no sense in which a locality such as that could ever be made up ‘primarily’ of any feature: e.g. schools, play areas etc.

Therefore, can the committee please amend the language to reflect the intent of the legislation?

The sentence would be better drafted as:

“However, applicants should be aware that there will be a general presumption for refusal especially where the location of the premises within the locality is close to or includes’:.....

Thanks,

Katy Taylor
Director

Bristol Women's Voice
Charity No. 1170110

Response

The extent and character of a locality must be considered (and re-considered) on each application. The policy does not prevent the locality of an application being considered and defined on that application and is deliberately worded in this way to recognise the changing nature of the city and highlights particular characteristics of concern that may be considered on each application.

To whom it may concern,

I would like to submit a question for the SEV hearing on 28 July, as follows:

As a Bristol resident and qualified HR professional with 13 years experience, I note the high number of vacancies for secure employment in the City, including in areas where women are currently underrepresented. If Bristol makes the decision to close SEVs, how will they support women to secure alternative employment in other areas of work.

Best wishes,

Clare Meraz

Response

The Committee decision is not about whether to close down the existing SEVs. If the committee were minded to implement the option for nil SEVs within the three defined policy localities this would not prevent the currently licensed premises from applying for renewal, and seeking exemption from the policy, or using the premises for other usage, or applying for an SEV licence in another locality within Bristol.

As a journalist of almost 20 years, trained in media law and ethics, I've been shocked to see the poor quality, biased, irresponsible press coverage surrounding this issue in almost all local media and some national media. As a political advisor and PR lead, I also understand how media coverage impacts high level decision-making. How will the committee recognise and mitigate the impact of this biased press coverage on its decision?

--

Laura Williams

Freelance Journalist, Editor and Communications Specialist

Response

It is not a matter for the Council to control the free press. We are aware that there have been a range of articles and coverage, however the committee will consider the information which is presented in the report and submitted during consultations. The meeting itself is public and will be webcast and the public will be able to see the facts of the decision being made directly.

I am writing with a question for the licensing committee as it considers the nil cap on SEVs:

We know from extensive research and women's lived experience that sexual entertainment venues are a gateway into further areas of the sex industry, including prostitution. Prostitution is linked to substance misuse, violence and abuse and poor mental health.

We know that many men attending strip clubs do so under duress and for them too, it is a gateway into further aspects of the sex industry including paying for sex.

Research shows that men who buy sex are more likely to hold negative attitudes towards women and to perpetrate sexual and domestic violence.

Can the committee be explicit and on the record about the relative weight they will give to the national and international evidence on links between the sex industry and male violence against women and girls (as referenced in the attached Safe and Equal Report) when making its decision?

Thanks

Katy Taylor

Independent Consultant
Supporting Organisational Sustainability & Development | Specialising in the Independent Women's Sector

Response.

It is a matter for each member of the committee to determine what weight to give to the information provided, all of which will be considered before reaching a decision.

This is a question based on the empirical data that is used to support the councils proposals

Across the three surveys [2020 public consultation, 2020 citizens panel consultation, 2021 public consultation], there are notable changes and inconsistencies in the attitudes towards SEVs, suggesting that they are not coming from representative samples and also that the answers are driven by the framing of the questions. In addition it is unclear how responses from the trade are treated. What measures did the team use to check this? Can the team be sure that multiple responses from the same individual are ruled out? If such checks are not made these quantitative results cannot be used to show overall support for any policy proposals. They are no more evidence of a general view in the population than the qualitative responses quoted in the appendices.

Amanda Gosling
Senior Lecturer in Economics, University of Kent

Response

Participants were asked to confirm what type of respondent they were. This is detailed in the breakdown at the start of each consultation. Digital technology allowed officers to ensure that respondents were unique and not mass submissions.

These premises should be kept open & the workers be allowed to ply their trade as they wish. It's all monitored and regulated .

Martyn Howlett



JOHN MORSE

— SOLICITORS —

Licensing Team (Temple Street)
Bristol City Council
P O Box 3176
Bristol
BS3 9FS

Our Ref: AS/MB/HAL012/0009
Your Ref:
Date: 21st December 2016

licensing@bristol.gov.uk

Dear Mr Carter

Sex Establishment Policy Review 2016/2017

We act on behalf of Reedbed Limited and Nightlife Bristol Limited who operate, respectively, Central Chambers at 9-11 St Stephens Street and Urban Tiger at 4 Broad Quay.

We are grateful to be given an opportunity to make a contribution, and hope that the following, brief, remarks assist the Council in its initial work on this topic.

The regulation of sexual entertainment

As the Council will know, prior to 2009 sexual entertainment was governed by the Licensing Act 2003, and therefore by the licensing objectives under that legislation. There was concern that those objectives did not cover the field in terms of the issues which have to be considered in relation to sex establishments. The resolution adopted by Parliament was to bring sexual entertainment venues within the same regime as applied to sex shops and sex cinemas. This has been a positive solution for local communities for reasons we set out below.

It is, perhaps, important to emphasise that the Act does not permit refusal on moral grounds or values. In legislating for the licensing of sexual entertainment venues, Parliament has made it

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abundantly clear that sexual entertainment is a lawful activity. This is further borne out by paragraph 3.23 of the Home Office Guidance on sexual entertainment venues.

It is fair to say that, in Bristol, there have been objections to our clients' licences and renewals which are, when properly understood, inadmissible objections to the nature of the activity.

It would certainly assist the efficient determination of applications for licence renewals if licensing officers could consider objections to renewal and advise whether individual objections are in fact relevant to the objectives of the legislation. Where they are not relevant, they ought to be discounted. In those cases where the only objections are on the basis of grounds which are not relevant to the legislation, there ought to be no need for a public hearing of the application for renewal. If this approach is taken, it will save legal costs for our clients and administrative costs for the Council.

The Council is also asked to make it clear in the policy that objections cannot be made on moral grounds and that any such objections will be discounted.

Standards for sexual entertainment

The regulation of sex establishments through the Local Government (Miscellaneous Provisions) Act 1982 has brought about a series of benefits for communities, as well as performers and customers. Each of these benefits can and, it is submitted, should, be reflected in a modern sexual entertainment venue policy.

The suitability test for licensees, owners and managers creates the opportunity to establish protective policies, since having such policies may be considered an incident or indicator of propriety:

- Codes of conduct for dancers. These may include rules such as no touching policies, standards of dress, exchanging details, reporting of misconduct and so forth.
- Codes of conduct for customers. These are generally the correlative of codes of conduct for dancers and ensure that customers know exactly what conduct is and is not permitted in the venue.
- Welfare policies for dancers. These may include the privacy of dressing rooms, private toilet facilities, the employment of a "house mother", protection of performers, accompanied exit arrangements and so forth.

The test for suitability of premises enables standards to be laid down in the Council's policy concerning CCTV coverage, ability to supervise premises (e.g. prevention of wholly enclosed booths), provision of proper facilities for performers, standard of toilet facilities etc.

The "locality" grounds in the Act enable Council's to impose a series of controls which minimise or even obviate any impact of the sexual entertainment use on the locality. These controls may include:

- A ban on logoed limousines.
- A ban on leafleting, advertising or other forms of touting in the public realm.
- Prevention of use of sexual imagery or language outside the premises.
- Controls on the nature of lighting to ensure that it is discrete and unobtrusive.
- Prevention of views inside the premises.
- Control of smoking areas, including supervision of smoking areas used by customers and, if performers smoke at the front of the venue, ensuring that they are segregated, discreetly dressed, and in strictly limited numbers.

The appropriate number of SEVS

The Council's current policy suggests that the appropriate number of SEVs for the city centre is two. It is submitted that there is no good ground to decrease that number. The following points are made:

1. The fact that the Council's Licensing Committee has repeatedly renewed the licences of our clients' venues demonstrates that they are not considered to have a detrimental impact on the city centre.
2. After many years of these venues trading in Bristol, the numbers of people actually objecting to renewal is extremely modest, particularly in comparison with the size of the Bristol population. Even then, a significant portion of the objections are based on moral grounds.
3. Moreover, to provide for two SEVs is certainly not excessive for a city with a population of 450,000. It cannot be said that there is over-provision.

4. The two venues provide jobs for 20 staff, 14 SIA-licensed security operatives and 40 performers, nearly all of whom are local to Bristol.

5. The venues contribute significantly to the local economy. For example:

- They pay £32,496.80 in rates.
- They pay £146,969.03 in VAT.
- They pay £60,491.38 in PAYE & NI.
- They pay £82,180.10 in corporation tax.

NB the above figures are commercially confidential and should not be publicly disclosed.

6. Moreover, the venues are subject to large investments which are dependent on the continuation of their licences. For example:

- The lease for Urban Tiger is for 10 years at an annual rent of £60,000 and the lease for Central Chambers is for 10 years at an annual rent of £42,000.
- In addition £25,000 has recently been spent at Urban Tiger upgrading the front of house facilities and a further £20,000 will be spent on the back of house facilities including toilet areas and changing rooms for the dancers and also putting in a shower for the dancers' sole use.
- £32,000 has also been spent at Central Chambers on new seating areas, upgrading the dancing facilities and installing new fire doors, windows and mirrors.

NB the above investments are commercially confidential and should not be publicly disclosed.

7. The businesses are entitled to protection under Article 1 of the First Protocol of the European Convention on Human Rights.

8. Further, the performers themselves are entitled to protection under section 149 of the Equality Act 2010. Closure of SEVs in Bristol would involve them losing their livelihoods as sexual entertainment performers in the city.

For the above reasons, it is suggested that there are strong, positive grounds not to remove the right of our client's businesses to continue to operate.

If, however, the Council has it in mind to make a provision in its policy to reduce the appropriate number of SEVs in the city centre, it may be aware that, in some other council

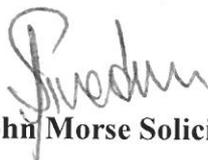
areas, policy provision is made for the preservation of existing business as an exception to the policy provided they are well-run, so as to avoid arguments that their closure involves a breach of Convention and legal rights. A form of wording which has been used elsewhere is:

“The Council recognises that there are established operators who have traded for a long period of time. In deciding whether to make an exception to any provision within this Sex Establishment policy, including the nil policy and any other policy consideration within this policy, the Council will give due weight to the fact, if proved, that the applicant is an established operator whose establishment is a long-standing, well-run sex establishment which has not generated significant levels of concern among the community or statutory authorities.”

In this way, while existing rights are preserved, the Council is enabled to make a policy which indicates that no further licences are likely to be granted and that closure of the existing premises will not be treated as making way for a newcomer to take its place.

It is hoped that these observations are found to be of assistance.

Yours faithfully



John Morse Solicitors



15th December 2021

Mrs C Hale
Urban Tiger
Bristol

Dear Mrs Hale

Thank you for meeting with me recently to discuss your views, and those of some of your performers, on the Bristol Women's Commission Nil Cap campaign.

I acknowledge that your two licensed premises operating in Bristol are compliant with the current Bristol City Council licencing regime and the performers I spoke with felt safe and in control working within those premises.

I was very concerned to hear their views about the wider issues of unregulated environments that some women work within. For example, the regular licensed premises in the city that can apply, up to several times in one year, for a one-off temporary SEV licence to put on events and the women who also perform at events or parties in private homes or premises.

Such issues, and the risk of more women working in these unregulated environments as a result of a nil cap coming into effect, are concerns I share as Police and Crime Commissioner. I believe it is incumbent upon us, as the statutory agencies responsible for protecting women and girls from violence, to work together to ensure that we stop these alternative services that have less or no protective regulation.

Despite your concerns regarding the impact a Nil Cap may have in encouraging performers into these less regulated environments, I write to inform you that I will be adding my support to the Nil Cap campaign and to explain my decision.

As you know the factors that contribute to violence against women and girls are complex and as stated in the Governments current tackling Violence Against Women and Girls (VAWG) Strategy:

*...the risk of it occurring in the first place has been linked to **attitudes toward gender roles**, both at an individual and societal level. At an individual level, large-scale multinational studies such as the International Men and Gender Equality Survey have identified inequitable gender beliefs and permissive attitudes about violence against women as important risk factors for male perpetration of violence* ^[footnote 72].

[Tackling violence against women and girls strategy \(accessible version\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94442/Tackling_violence_against_women_and_girls_strategy_accessible_version.pdf)

I do acknowledge that to date there has been no empirical evidence to directly link SEVs to violence against women and girls. However, we are all aware that there has been a broader shift in society's tolerance of objectification of women, misogyny and violence and abuse as indicated by movements such as #MeToo.

I believe it is imperative that the police and other statutory agencies with responsibility for public safety and protecting vulnerable women and girls, lead the way in setting the standards for that cultural shift - especially in the wake of cases that have shaken public confidence in policing such as the murders of Sarah Everard, and Bibaa Henry and Nicole Smallman.

I am pleased to say that our new Chief Constable in Avon and Somerset Police, Sarah Crew, is the national police lead for the response to Rape and Sexual Assault Offences (RaSSO). Sarah is passionate about her work as the RaSSO lead and, as such, ASP have ambitious plans to work with partner agencies to tackle key issues around performance, victim support and cultural attitudes related to misogyny and all offences involving violence against women and girls.

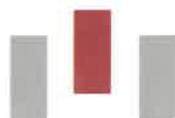
It is for all these reasons that I am going to support the campaign for a Nil Cap on SEV licences in Bristol.

I do recognise that this view may directly affect a number of women, like the ones I met and spoke with. Should a ban on all SEVs come into effect in Bristol as a result of this campaign, I would like to see all the partner agencies involved working together on a comprehensive exit strategy that offers support and advice services to those impacted.

Fare Thee Well

A handwritten signature in black ink, appearing to read 'M. Shelford', with a large, sweeping flourish underneath.

MARK SHELFORD
Police and Crime Commissioner
for Avon & Somerset



JOHN MORSE

SOLICITORS

Mr Mark Shelford
Police & Crime Commissioner
for Avon and Somerset
Police Headquarters
Valley Road
Portishead
Bristol
BS20 8JJ

Our Ref: AS/BDR/HAL012/0011
Your Ref:
Date: 07 January 2022

BY POST & BY EMAIL: pcc@avonandsomerset.pnn.police.uk

Dear Mr Shelford

Our clients: Urban Tiger and Central Chambers

I write further to your letter dated 15th December 2021 addressed to Miss Carrie Hale of our above named client company.

I have considered the content and I believe the following points arise:

1. It is a welcome acknowledgement that you agree that there is no evidence whatsoever linking my clients clubs to gender based violence.
2. In Bristol the contrary position is true as there is copious evidence linking nightclubs and student campuses to such violence. I would suggest efforts should be made in reducing gender-based violence in these scenarios and areas as opposed to in my clients clubs.
3. Your letter relies on the VAWG strategy. This strategy is in respect of criminal violence on women. This strategy does not relate to supervised non-contact dancing in licenced venues or cite this as a cause. There is clearly a world of difference between believing women can be raped with impunity and attending a licenced performance venue.
4. Your letter cites a single footnote from the strategy – FN72. This article is about intimate partner violence in Bosnia and Herzegovina, Brazil, Chile, Croatia, Democratic Republic of Congo (DRC), India, Mexico and Rwanda. Not a word of this strategy is about links between licenced sexual entertainment and violence against partners. I therefore cannot

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understand why you are relying on such evidence when there are no parallels between what happens in my clients clubs and the awful treatment to women that you are trying to protect.

5. Your letter acknowledges that if SEVs are banned the activities will continue in unlicensed venues. You make a fundamental and elementary error in supposing that this is preventable. It isn't. The frequency exemption permits completely unregulated sexual entertainment (full contact advertised and unsupervised) eleven times a year in every premises in Bristol. If you do actually care about the protection of performers and customers rather than playing at politics you should be supportive of licensed and highly regulated venues which protect the performers.
6. You also presume that an exit strategy is required. This is more a policy that applies to prostitution which is directly associated with VAWG. It is preposterous to assume that such a strategy is required in the case of adult women who actually have free will to engage in the activity. In any event they will just go and dance in other cities which will benefit from a regulated economy that Bristol will be turning its back on.
7. It also seems that you have totally misunderstood the role of the regulatory authority. It is not the job of the council to decide whether SEVs are a good or bad thing. Parliament has done that. It has said that they are legal. It has not said that they are inherently harmful. If you want to engage in performative political campaigning, I invite you to address your remarks to Parliament. When last Parliament looked at this through the DCMS select committee it heard evidence from the most senior police officer in the country dealing with the topic, Adrian Stud. Mr Stud was the former Head of Clubs and Vice and was the relevant officer in ACPO who correctly said that evidence of crime associated with such venues was pretty much non-existent.

I would therefore invite you to reconsider the comments in your letter as they do not have any relevance or association with any regulated activities that take part in my clients clubs.

I would also invite you to support the regulated entertainment within Bristol as the removal of SEVs would clearly cause more harm than good.

Yours sincerely



John Morse Solicitors

Public forum statement - Licensing Committee 28TH July 2022 - SEV policy review

Councillor Carla Denyer

I am sure that the committee all understand and agree with criticisms of the recent US Supreme Court ruling on abortions. In brief - banning abortions won't stop abortions happening, it just means they will happen in dangerous, frightening ways - people will be harmed, and some will die as a consequence.

The case against a nil cap on SEVs is similar, because prohibition policies rarely work. Look at the alcohol prohibition era in the USA. Look at the failed 'war on drugs' both sides of the Atlantic, and compare them to the legalise-and-regulate approach that has reduced harms in many European countries. And look at the research on the impact of Nordic Model legislation in countries that have brought it in – it doesn't stop the sex trade, it puts sex workers at greater risk.

Closing strip clubs won't stop those sexual entertainment events happening, it just means that they will happen in less regulated, less safe ways.

Please vote against the nil cap so that sexual entertainment work (which will go on regardless of your decision today) can remain regulated by the council and kept as safe as possible.

Thank you.

Dear Sirs,

Unfortunately we are unable to attend the consultation meeting on 28th July. As a result, we have made a short statement that we would like read out by Stephanie Poyntz on our behalf at the meeting.

Tackling the issues around domestic abuse, violence, and stalking is at the forefront of what we do at the Hollie Gazzard Trust. We believe that educating young people on these topics is an effective way to promote healthy relationships later in life.

The licensing of SEVs runs counter to the Council's duty to promote healthy relationships between men and women, boys and girls.

SEVs actively encourage the objectification of women and they promote the idea that women and their bodies are there to be bought. These ideas can extend to other aspects of men's lives and it is these harmful and sexist attitudes that can lead to tragic results, that we seek to address within our workshops.

We need the City Council to lead the way in promoting mutual respect between boys and girls, men and women, and to help in educating young people on how to achieve healthy relationships, rather than licensing the objectification of women and leaving other agencies to tackle the consequences.

We at the Hollie Gazzard Trust strongly believe that a nil cap on SEVs is the only sensible policy that Bristol City Council can adopt if it wants to ensure that it is promoting equality between the sexes.

Many thanks.

Nick Gazzard

Founder and CEO

My pronouns are he/him

Hollie Gazzard Trust

Corinium House

Barnwood Point Business Park

Corinium Avenue

Gloucester

GL4 3HX

Registered charity no. 1156804

Dear Licencing committee,

I am writing to make my objection known regarding the two SEVs that currently exist in Bristol. I do not want to attend in person or have my name read out as I am afraid of repercussions if I am recognised. I am happy for Stephanie Poyntz to read it on my behalf. I live close to both strip clubs but especially close to Urban Tiger on Broad Quay. As a woman, I feel wary of my safety when it is open. The security guards look frightening and intimidating and give the impression that there is something sinister within the blackened out building, which, of course, there is.

Broad Quay is undeniably and increasingly a residential area with previous office blocks being converted into new flats. Urban Tiger is situated in the midst of these residential flats. Central Quay North, Central Quay South, Alliance House, Baldwin Lofts, Saco and several other blocks are all close. Please do not issue the premises with further licences.

Yours sincerely,
J F

19/07/2022

Dear Licensing Committee,

I have worked at Urban Tiger for the past 3 years. I have come to the industry after years of struggling to make ends meet as a circus performer. Anyone in the arts who does not come from a wealthy background will vouch for how difficult it is to live comfortably in an underfunded and undervalued industry. Stripping has allowed me to have a flexible enough schedule to pursue my dream career whilst simultaneously enabling me to live a comfortable life - not living in constant stress due to living from paycheck to paycheck. Closing Urban Tiger and Central Chambers would push me back into poverty, precarious and underpaid work - or I will most likely keep on dancing in Bristol, but in riskier spaces where there will be no security staff and no CCTV.

This year, I had the opportunity to conduct a research project alongside Dr Jessica Simpson on the effects of SEV licensing and nil-caps on strippers. Our pilot survey gathered 54 responses. A few respondents qualified anti-strip club campaigns to have made them feel 'panicked' and 'traumatised'. Our findings were extremely clear: the stringent regulation of SEVs creates precariousness, and the constant threat of workplaces getting shut down increases our stress and anxiety. Dancers reported feeling unable to leave clubs with poor working conditions due to a lack of viable alternatives. A significant number reported having to work in more dangerous environments such as hotels or AirBnBs, or having to turn to other forms of sex work such as escorting which carries a higher risk of violence and sexual violence.

In addition, I find it particularly cruel to push a workforce that is predominantly female into poverty and financial precarity. Only this month, this very council overwhelmingly voted in favour of a motion opposing the cost of living crisis. This motion acknowledged that it disproportionately affects women. How could the same council, only three weeks later, justify pushing a group of women into unemployment and an unfit benefit system? With rent prices soaring in Bristol, how could you justify potentially pushing some women - of whom many have dependents - into homelessness? Strippers should not be treated like second class citizens: we should benefit from the same rights as any other women and be equally entitled

to state protection. We should not be thrown under the bus and used as collateral damage for political point scoring.

As a trade unionist and committee member of United Sex Workers, I am appalled that Bristol City Council is putting forward a policy that is essentially anti-worker. Shutting down our workspaces only results in us losing access to workers rights such as the rights to be safe at work, unionise and collectively bargain for better working conditions. Removing legal, safe environments for us to work in does not remove the social and economic conditions that have led us to the industry. Keeping the clubs open is harm reduction. The council should prioritise our safety instead of the comfort of white middle class lobbying groups. Shutting down strip clubs is essentially a way to police women's bodies, strip us from our agency and criminalise poverty. You will not tackle violence against women and girls by reproducing violence against sex workers. We are a byproduct of the patriarchy, not a cause.

Should this committee vote for a nil-cap, I fully support United Sex Workers taking legal action against this council. I share the view that shutting down the workplaces of a group that is predominantly female would breach the Equality Act 2010. Besides, the public consultation from 2019 showed that 66% of the public opposed the closure of the present SEVs. Two years later, this number is now 86%. Bristol City Council must honour workers rights, women's rights and democracy by voting against this proposed policy.

Amelie

Mandate

NUM is committed to ending violence against sex workers and eliminating the conditions that lead to survival sex.



Core Values

Inclusion
Compassion
Integrity
Contribution

Endorsement

'NUM's service has been superb and hasn't faltered keeping us up to date with risk alerts.'
-Sex Worker, 2021

Contact

website:
www.nationaluglymugs.org

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@nationaluglymugs

National Ugly Mugs (NUM) does not support the nil cap planned for Sexual Entertainment Venues (SEVs) in the city of Bristol. A nil-cap policy will have a severely detrimental impact on womens' safety and economic security, particularly during these times of Covid-19 'recovery' and as we are facing one of the biggest economic crises of a generation.

NUM is a UK-wide survivor support charity for individuals who work in adult industries. Our membership sits at approximately 8,500 individuals, the vast majority of whom identify as active UK-based sex workers. Every day at NUM, we see the harms that sex workers and adult industry workers face; harms that are exacerbated by structural violence (ill-informed laws and policies and inappropriate action or inaction by those responsible for the safety and protection of members of our communities). Some policies force the population into predicaments not seen in other industries, such as being forced to work alone, without support, without protection and without the legal protections afforded to other workers. This in addition to harms associated with moralism that contribute to sex industry stigma, discrimination, and social exclusion.

NUM views the closures of SEVs, where adult industry workers legally trade, as a dangerously imprecise approach to ending violence against women and gender-based violence. As you are well aware, those in sex work are more likely to face additional marginalisations: women, people with disabilities, single mums, students, people of colour, and others facing far greater barriers to mainstream work. SEVs are regulated, and provide physical and financial security for workers, in addition to a sense of community and belonging. To remove the ability for dancers to work in licensed, regulated venues is not only an elimination of the protections that they have as workers, but will reduce their choice and control over their working arrangements and increase vulnerability and danger.

Have you asked workers about the way these closures will impact them, and genuinely listened to their answers? Workers need the opportunity to provide you with a fuller understanding of the financial and emotional impacts this change will have on their economic security and well-being. Furthermore, workers in these venues can then discuss how exploitation truly manifests in their working arrangements to ensure that harms that *they* identify are remedied and we see a material end to labour exploitation. As their representatives, you are accountable for the decisions that you make that will affect their lives, their safety and their security.

Have you made provisions for financial and vocational support for every dancer you displace if you choose to remove their place of work? Have you negotiated these with workers? It is your responsibility to provide viable alternatives which account for the complex reasons why people engage in sex work. We have seen the lethal affects of displacing sex industry workers on-street, off-street and online, not only in the UK, but around the world. Women who are struggling for income to survive will compromise their health and safety, and engage in work throughout the adult industries that they would not otherwise participate in and in ways that they would not otherwise choose.



We have seen the impact that the closure of SEVs will have on performers. We see that their income is reduced and becomes less stable; that they increasingly use precarious or dangerous agencies to find work; that they are less able to leave exploitative labour contracts or conditions. We see that their physical safety is placed at much greater risk, as they work alone, in more dangerous and isolated locations, lose contact with their colleagues and support networks, and are more likely to turn to forms of sex work with greater risks of crime, harm and violence. Banning SEVs will not end sex work or adult entertainment: it will simply move it and make it less safe.

We write to you today to alert you to the issue of legislated poverty, and forewarn you about the deadly outcomes linked to arbitrary and ill-considered disruptions to revenue for women and marginalised populations working in sex industries. You have an opportunity today to make a decision which supports workers and centralises their safety and security by opposing the nil-cap, or to make one which will directly place them in physical and financial danger.

We urge the City of Bristol to consider the harms associated with displacing adult industry workers, and how your decision today will directly correlate with making these women destitute and more susceptible to exploitation and violence.

Dr. Raven Bowen, CEO and Rosie Hodsdon, Executive Assistant

About National Ugly Mugs

National Ugly Mugs (NUM) is a UK-wide survivor support charity for individuals who work in adult industries. Our membership sits at approximately 8,500 individuals, the vast majority of whom identify as active UK-based sex workers, along with over 1,000 individual practitioners in frontline services across the country. We provide a range of digital, individualised and in-person services geared towards harm prevention, victim/survivor support, and mental health, wellbeing and recovery. We are currently innovating to deliver vocational support services to aid those interested in leaving sex work or blending it with other revenue streams.

Essential Reading

- Herrmann, T. (2022). Colleagues, Councils, and Club Owners: The Materialisation of the Whorearchy Inside British Strip Clubs. https://link.springer.com/chapter/10.1007/978-3-031-04605-6_4
- Barbagallo, C. and Cruz, K. (2021) Dancers win at work: unionization and Nowak v Chandler Bars Group Ltd. <https://www.tandfonline.com/doi/full/10.1080/07078552.2021.2000208>
- Sex Workers Too: Summary of Evidence for VAWG 2020-24 Consultation. National Ugly Mugs, English Collective of Prostitutes and Umbrella Lane. https://nationaluglymugs.org/wp-content/uploads/2021/06/Sex-Workers-Too_NUM_ECP_UL_VAWG_Consultation_Submitted_19022021.pdf
- Amnesty International (2022) 'We Live within a Violent System': Structural Violence against Sex Workers in Northern Ireland. Available at <https://www.amnesty.org/en/documents/eur29/5156/2022/en/>



- Sexuality Research and Social Policy, special issue on Harm Reduction and Decriminalization of Sex Work
https://link.springer.com/journal/13178/volumes-and-issues/18-4?fbclid=IwAR2nj3l_5pipYlujciOt9l0PyrzOzFiWZI2UyCKhqeibT2FVnD8AGP0Uwlv
- London School of Hygiene and Tropical Medicine. The East London Project
<https://eastlondonproject.lshtm.ac.uk/> [Further publications forthcoming]
- Doctors of the World report 'Left Out in the Cold'
<https://www.doctorsoftheworld.org.uk/publications>
- The Lancet, Public Health and Human Rights of Sex Workers
[https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(03\)13594-5/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(03)13594-5/fulltext)

Nil Cap

I'm writing this email because I strongly disagree with the idea of a nil cap on the strip clubs in Bristol. In the time I have been dancing, I have learnt a few things. Society classes sex workers as lower class citizens, and is willing to degrade the people that choose to be in the industry. Not only does a nil cap support this ludicrous idea but it also helps play into the misogynistic views behind it. The idea of a nil cap is simply an unthought out power strike against women and people who by opting to work in this industry, are taking the power back from the patriarchy and gaining financial freedom.

The argument against the clubs is that their presence harms non sex working women by enabling misogyny. Closing down strip clubs isn't going to solve the problem. In areas without strip clubs, misogynistic violence isn't decreased. In fact, in the grand scheme of things, it will cause more problems than it's trying to 'solve'. Putting 100+ women out of work will take away their freedom, changing their day to day life, and open them up to further violence. For many, who have disabilities and caring responsibilities, life will become impossible.

People who strip come from all different walks of life and their choice to do work like this has positively affected what may have been their outcome if they chose not to. Dancing not only for me but many others has given me choices I would have never have even considered possible before I started. It's given me financial freedom, and the chance to pursue dreams and goals. The idea of a nil cap will force some people to travel a greater distance to work. For people that don't have that choice, they will have to declare themselves as unemployed or rely on their partners. The devastating impact this will have on some people will completely alter their life. If a nil cap is decided, you will be creating issues where there were no issues to be had.

Dancing in Bristol is a very safe job. We are more than looked after by a whole team of people who are there to keep us safe. We are looked after when it comes to our safety and we have basic things accessible to us. I love what I do. It's one of the best decisions I've ever made. it's given me the freedom to see a future in my life where things look good for me.

I understand it's not everyone's cup of tea, I really do. If you're uncomfortable with the idea that's fine, but your opinions shouldn't have an input in my life as it's not yours to live. These are my choices and it will be my outcome. It is not affecting your day to day.

Remmi

Licensing Committee
Bristol City Council
BY EMAIL

STATEMENT FOR MEETING on 28th JULY 2022
AGENDA ITEM 6
Sex Establishment Policy Review

This statement was prepared by Equity, the UK's largest trade union in the arts and entertainment industry. We represent over 47,000 performing arts practitioners. Our membership is made up of actors, choreographers, comedians, dancers, drag artists, theatre directors, models, singers, stage management, storytellers, stunt performers and co-ordinators, theatre designers, theatre fight directors, TV and radio presenters, variety, circus, cabaret and light entertainment artists, voice artists and supporting artists. Our members perform their work in a variety of venues, including SEVs.

The right to a safe workplace is enshrined under the Health and Safety at Work etc Act 1974 (HSWA 1974) (as amended) which places a duty of care for employees, casual workers, self-employed workers, clients, visitors and the general public. Under s 2 (1): 'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.' Section 2 (2) states: 'Without prejudice to the generality of an employer's duty under the preceding subsection, the matters to which that duty extends include in particular (a) the provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health'. The local authority licensing committee ensures through their licensing process, a process which is done without any reliance on moral grounds/values.

We recognise that the licensing of SEVs made possible by the setting of caps in any city may divide public opinion on moral grounds, but at the heart of our argument is the protection of workers' rights, their right to a safe and regulated workplace and the right to have a say in how their workplace provides its duty of care. We stand alongside our sister trade union United Sex Workers (USW) in making these arguments on behalf of our collective members working in Bristol.

Being members of the USW and Equity allows performers at SEVs in Bristol to organise and ensure fair working conditions and rights which the unions would

be unable to do should the venues become unlicensed and push this kind of work underground. We have already seen this happen where similar 'nil-cap' policies have been implemented and USW have also been working with dancers to create progressive SEV policies elsewhere, so there is an opportunity for Bristol to follow in their footsteps by not setting a nil-cap and creating policy that centres the experiences and rights of the workers instead of giving credence to the negativity given to this kind of work by the mainstream media and culture. We hope that Bristol City Council would be supportive over greater worker regulation and safety, rather than less, and on protecting livelihoods (predominantly of women) and not endangering them. Like all freelancers, workers in SEVs were not immune to the impact of the COVID-19 pandemic and the impact of the closure of their workplaces, and the precarity of their livelihoods. A nil-cap policy in Bristol would again close their workplaces, with the only alternative work being in unlicensed, unregulated and unsafe establishments.

For those that do not see sex work as 'work', dancers in SEVs have a corresponding common law duty to take care when performing, and have been classified as workers, granting them rights under employment law despite their casual employment status. The vocation of dancing in SEVs has been recognised as an occupation that workers depend upon for their livelihoods. In *Nowak v Chandler Bars Group Ltd* UKET 3200538/2019, a claim by a dancer that she was dismissed without any reasonable grounds for dismissal was upheld. The employment tribunal stated that sex work is a form of labour that workers depend upon for their livelihoods. There was a basis for redress even if there was no written contract, because there was an implied agreement that arose from a 'mutuality of obligations' and the claimant had an implied contract which 'are expressly within limb (b)—that dancers do not compete with the Respondent' (para [68]). This brought the claim within the definition of s 230 of the Employment Rights Act 1996 (ERA 1996) and reg 2(1) of the Working Time Regulations 1998 (SI 1998/1833).

A previous consultation on the Sex Establishment Policy by Bristol City Council was carried out in 2019 which proposed maintaining the number of establishments within the city – 66% of Bristol residents were happy with the current number of SEVs and did not object to them. In running this consultation again the headline results are that 86% either disagreed or strongly disagreed with the proposal of a nil-cap, with arguably a much larger number of respondents. If the general public in Bristol do not object, it is difficult to understand why there is an increased desire to introduce this nil-cap if you are basing your decision on public opinion.

There are, of course, complicated considerations to consider under the Public Sector Equality Duty, especially around the negative impact which certain stakeholders and respondents have outlined. However the proposal in front of the licensing committee does not seek to increase the cap, it is a simple choice between preserving the status quo or imposing a nil-cap. Equity believes that preserving the status quo provides the committee, through its decision, to lay the foundation for proper monitoring through yearly licensing and working with the stakeholders and workers to enable a better understanding of the duty of care of these clubs to its workers and to eliminate the stigma around the choice people take in making this profession their chosen livelihood.

Dance professionals in SEVs have employment rights which they have established by raising their claim and establishing that they are socially productive labour whose work falls under limb (b), ERA 1996. This provides them with the ability to seek redress in the employment tribunals and be granted the appropriate remedies. In the light of the assessment that dancers are professionals, there can be no breach of the PSED if they are allowed to continue their work, and local authorities should not arrive at their judgments subjectively.

SEVs are part of the landscape, and they would be pushed underground if they were to be removed. This is an important consideration that local authorities cannot ignore, as it will cause greater problems without any visibility or control. We believe that the current cap should remain, and oppose the nil-cap proposal.

Simon Curtis
National and Regional Official
Wales and South West England
Equity
scurtis@equity.org.uk

Hi,

We have been contacted in the past by Bristol Sex Workers Collective who have talked to us and asked the group to sign an open letter opposing the proposed nil cap on SEV's. As a group we have signed the letter in support and have asked us for a short comment here.

In 2016 Amnesty published comprehensive research and policy in relation to sex workers. This clearly highlighted the precarious safety of the workers involved :

<https://www.amnesty.org/en/latest/news/2016/05/amnesty-international-publishes-policy-and-research-on-protection-of-sex-workers-rights/>

Also in 2022 Amnesty published an extensive report on the Nordic model in Ireland, again highlighting the real safety risks to the workers involved (pages 24-31) :

<https://www.amnesty.org/en/documents/eur29/5156/2022/en/>

As a result we really hope that any outcome from the council in relation to this matter has due discussion and consideration of the safety of the workers involved.

Bristol Amnesty International Group

From Annie McGann – Save Bristol Nightlife

It is clear from the results of the consultation that the people of Bristol do not have a problem with the existence of Urban Tiger or Central Chambers. It is also clear, having read through the documents supplied, that those objecting to the clubs, as usual, are intent on insulting those that work in the clubs by suggesting that they are prostitutes, possibly trafficked and probably pimped! They also seem to think the dancers are unaware of sexual health, rape crisis centres etc etc. when in fact the objectors have never set foot in the clubs or spoken to the dancers, let alone inspected the dressing room facilities and notice boards! They seem to think that dressing rooms, showers and loos for the dancers don't exist when they do! They won't exist, in the places dancers will end up working if the SEV licences are removed. It is absurd!

Thankfully, the clubs are fully regulated and well inspected by the council. I too am in and out of both venues on an informal level and I have got to know those who work there. I understand how the clubs operate from both the owner's and the dancer's and the security staff's perspective. I understand what the business model is and when there have been problems, I have seen them swiftly acknowledged, addressed and eventually worked out. If there is a nil cap on SEVs this will not stop stripping and lap dancing – this is a fact – I believe it is better to have safe regulated spaces for these activities and I also believe that we need to give the SEVs and those who work in them the space to evolve and change and progress because, actually, the fuss that is made about them every single year is having the effect of kind of freezing the progress and change that would otherwise be happening.

I believe that in order to progress, we need to rethink the whole way we are going about regulating SEVs in our city, and that we need more SEV licences, not fewer. Yes! The dancers need the freedom of choice as to who to work for and even to have the opportunity to work as a collective themselves and open their own place. It is ridiculous to cling to preconceived ideas about strip clubs and imagine the activities will come to a halt if the licenses are removed. The industry and those who work in it have already moved on from what they were when this annual assault on their right to work in safety began, which was pretty much as soon as the regulations came in! Please can we move forward with a more radical approach instead of constant repetition of vexatious objections and questionable research? I know that those who oppose will never be persuaded otherwise but as well as the resounding no to nil-cap shown through public consultation, Bristol nightlife people consider the strip club workers an integral part of the nightlife family and we need to stick up for them and their jobs. We will need to be looking out for the dancer's safety and welfare if the clubs are closed because they will need our support even more then. Please don't throw them to the dogs of deregulation.

Annie McGann

Save Bristol Nightlife
Night Watch/24hr Bristol
Bristol Association of Restaurants, Bars and Independents.
S.W. Region Industry Ambassador for the NTIA

The board could consider implementing a pilot scheme. Which will ensure safety of staff and customers in these establishments safe. If there was a scheme similar to that of the building trades cscs cards which will ensure all workers are trained to a safe standard whilst using the equipment at work. The scheme would also help police identify vulnerable workers visiting the area. It could also help hmrc with tax collection, and Bristol City Council would be able to monitor the Sat's of worker living within the city as well as the flow of workers coming into the city. The scheme would provide a club safe scheme. I could go to into further detail. And have already with the help of natwest entrepreneur hub composed course content for training on the safety I would like to discuss further the needs of the board to fully complete a compliance regulation criteria that each club would have to pass and agree to follow before being issued the POLE PERFORMANCE CLUB SAFTY SCHEME.

If the sex establishment industry in Bristol is closed this action I am sure will push the industry underground. If the industry is pushed underground these workers will be at great risk of harm. It will also enhance the stay silent policy encoraged by club owers regarding abuse. Women could be forced into the underground world.

Banning the industry I sincerely feel will drive a whole new level of the illegal sex trade within Bristol.

It would be more beneficial for Bristol City Council to implement such a scheme as P.P.S (poleperformancesafe)

for further information or discuss futher please do not hesitate to contact me at poleperformancesafe@gmail.com

This could be a could option for Bristol to pilot the POLE PERFORMANCE SAFE scheme

Tay Xperia
Pole performance safety

To be summarised by Penny Gane.

This is a short statement from 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) which endorses the policy approach of a nil cap sexual entertainment venue policy across all localities in Bristol.

It is recognised by experts that SEVs are sexist, promote harmful attitudes to women that are the bedrock for SGBV, and obstruct progress towards equality between women and men. Their equality impact, which is negative, cannot be mitigated. They are an unnecessary threat to the health, safety and equality of women, both the small number working in SEVs, the large number of women and girls who may go on to work in SEVs over time and the population of women and girls who are residents of the local authority in which SEVs exist.

SEVs symbolise, foster and celebrate attitudes that are sexist and that are associated in men with hostility to women, likelihood to sexually harass women, and likelihood to commit violence against women. It is not appropriate for them to be licensed by any 21st century city (and many have already implemented nil caps), but the City of Bristol particularly prides itself on putting equality at the heart of its vision.

In 2021 we [published](#) a thorough evidence review of the gender impact of sexual entertainment venues. The report provides significant evidence that it would be **perverse** to have due regard to the Council's positive duties under the Equality Act 2010, yet decide that anything more than a zero-cap SEV licence policy would be suitable.

Committee members have seen no evidenced explanation (as opposed to the understandably tactical, anecdotal arguments) of why anyone should conclude that regulating a limited number of venues that harm women is better than a policy that says there should be no such venues. There is no empirical evidence that regulation of SEVs contributes to the safety of performers, but there is clear evidence that performers are unsafe even in highly regulated environments. The nil cap policy approach is a positive step for Bristol for moving forward as a city free from SEVs and from the appetite of SEV operators for new recruits into the sex industry on an ongoing basis.

There is no evidence that a nil cap or licence refusal results in SEV activity going 'underground', or that unregulated activity would increase in response. On the contrary, research suggests that supply, not demand, dictates whether customers engage in SEV activity. SEVs invest in marketing sexual entertainment to drive up demand and they cross-promote other related and unregulated activities as any good journalist who wanted to investigate would quickly discover. It follows that sexual entertainment activity and the harms associated with it will decrease when the city brings in a nil cap.

The decision that the committee takes in 2022 is one that will have impact upon the lives and life-chances of girls, women, men and boys in the city year on year. It is right, and we call on the Council, to work with the small number of women who currently work part-time as self-employed strippers in Bristol¹ to assist and improve their future employment prospects.

There is still a long way to go - but a city that licenses strip clubs is - by definition - a city that licenses sexism.

Notes:

- 1) This policy review process has been so long that it has spanned a number of elections & committee appointments. The most recent policy proposal for an 'appropriate number' of zero SEVs, was adopted in 2021 following years of evidence-taking, briefing from equality experts & soundings with groups representing business interests. As it was a new proposal based on a robust assessment of the evidence of harm to women, it went to consultation, as all proposed policy changes should. Consultation with the public & with affected parties is part of the democratic process (although it is not the same as representative sampling). In a sexist society, sexist views & a desire to maintain the sexist status quo are expressed, just as racist views are expressed in a racist society. The city council's challenge is to be active in rejecting sexism & not complicit in promoting it. All your experts in gender equality, gender based violence & women's rights have supported the zero SEV approach as part of the foundation of a city-wide approach that does not pay lip service to equality between women & men but delivers on it.
- 2) The published papers include one single journal article: the [Safe & Bristol report](#) references over 150 peer-reviewed (high quality) pieces of research but, despite being publicly available, the report has not been reproduced in the public papers for this meeting, nor referenced in the Equality Impact Assessment which unfortunately has not picked up on many of the important equality impacts carefully referenced & evidenced in the report.
- 3) The proposed policy approach for a nil cap is the correct approach, which supports the aims in the European Charter for Equality of Women & Men in Local Life, to which Bristol is a signatory. It also supports the Local Authority's obligations & duties as set out in the following:
 - CEDAW (United Nations Convention for the Elimination of All Forms of Discrimination Against Women) - Articles 1, 2, 5 & 10 & CEDAW Recommendation No. 19 addressing the objectification of women
 - Recommendations 68(a), 76(a) & 78(c) of the Beijing +5 (2000) – Resolution of the 23rd Special Assembly of the United Nations General Assembly
 - United Nations Sustainable Development Goal 5 of the 2030 agenda as set out in UCLG (2015) From SDG5 to Habitat III: The Role of Local Governments in Promoting Gender Equality for Sustainability & as guiding Bristol's One City Plan; goals in the City Plan 2019-2029 as well as 2030-2040 & 2040-2050
 - Recommendations of UN-Habitat as set out in United Nations (2012) Gender Issue Guide: Urban Planning & Design. Nairobi, Kenya: UN-Habitat
 - The imperative to "challenge the deep-rooted social norms, attitudes & behaviours that discriminate against & limit women & girls across all communities" set out in HM Government, Ending Violence against Women & Girls Strategy 2016-2020 & its Tackling Violence Against Women & Girls Strategy 2021
 - The values & obligations as set out in Bristol's Corporate Strategy 2018-2023
 - The Equality Act 2010, the purpose of Equality Impact Assessments & the test of whether action needs to be taken, & the EHRC Technical Guidance on the PSED (2014) requiring relevant bodies to tackle the consequences of past decisions which failed to give due regard to the equality aims
 - World Health Organization (2019) RESPECT Women guidance for policy-makers on preventing violence against women
 - The Istanbul Convention on Preventing & Combating Violence Against Women & Domestic Violence, to which the United Kingdom deposited its instrument of ratification on 21st July 2022.

I strongly support the proposed nil cap on Sexual Entertainment Venues in the city.

Bristol should take this step towards becoming a fair and equal city where there is no place for misogyny or harassment, exploitation, abuse or violence against women and girls.

Violence against women and girls stems from misogynistic attitudes, exactly those attitudes perpetrated in SEVs where men's entitlement to women's bodies is enshrined. The objectification of women by men for the purpose of sexual gratification has a ripple effect on the way women are treated in general. So many of us in Bristol are working hard to stamp out violence against women which has been so prevalent of late, we cannot do this without tackling the misogyny that underpins it.

The powerful sex industry lobby has campaigned hard on the issue of employment of women who work in their clubs. So how do you weigh up the so called 'employment rights' of the women who pay to work in Bristol's 2 clubs against the overwhelming harassment, abuse and exploitation of thousands of women and girls across the city? Do you look at the research, the facts and the evidence? Or do you just listen to those with a vested interest- in making money through the exploitation of women's bodies -the Clubs themselves.

In fact the women working in these clubs have very few employment rights. How many were furloughed in the pandemic? SEVs exist to make money from men's sexual gratification, not as equal employment opportunities for women.

There is also a mistaken but widely spread myth that if the SEVs are closed the industry will go underground. There is no evidence for this whatsoever. In fact the opposite is true. Research suggests that it is supply, not demand, that leads to more men paying for sexual entertainment. Council officers have been tasked with researching those authorities who have adopted a nil cap. What are the results?

Ofsted figures reveal that almost all girls in school have received unwanted sexual attention. The 'Everyone Invited' Initiative showed that sexual harassment is an issue in 22 of Bristol's schools, and no doubt many more. Schools are now trying to teach young men and boys to treat girls and young women with respect. So it makes no sense to abandon this effort when young men reach the age of 18 by legitimising venues where men's entitlement holds sway.

The Licensing Committee should get behind all the initiatives in Bristol trying to root out misogynistic attitudes to women which can be a precursor to harassment, abuse and worse. Bristol should be a shining light in the wider area of women's safety and could be by taking this one small step - to have a nil cap on SEVs which is consistent with the wider aim.

Karon Monaghan QC told the Women and Equalities committee (2018) that SEVs "have an impact on the wider community because they promote the idea that sexual objectification of women and sexual harassment is lawful and acceptable." She

added “How are we doing that in the 21st century? We won’t get rid of sexual violence if we mandate the sexual objectification of women in licensed venues.” And she’s dead right.

Bristol Women's Commission was founded almost a decade ago to embed women's equality into decision making in the city. We want Bristol to be a fair and equal city where women can live their lives free from male violence, valued for who they are, not how they perform for men.

In recent weeks, we've witnessed regressive policy changes, such as Roe v Wade in the US, that roll back women's rights and prevent women's equality. Bristol has a chance today to implement a progressive local policy that furthers women's rights, moves us closer towards achieving women's equality and could pave the way for more councils to follow suit.

Our support for a nil-cap - a position shared by the Mayor, Police Crime Commissioner, MPs and many others - is grounded in tackling the sexist attitudes and behaviours that lead to male violence and prevent women's equality. Our position is based on evidence that shows the link between strip clubs, the sexual objectification and male entitlement they promote and profit from and the epidemic of male violence we are in the midst of. It's informed by contributions from gender violence experts and women's rights organisations; with input from sex trade survivors, sexual assault survivors and women too scared to go out alone in Bristol City Centre at night.

Despite how it's been framed by the sex industry, this is not about workers' rights, but women's rights. Adopting a nil-cap approach is not anti-worker, but anti-sexism. Something has gone wrong when we're telling women that paying to work in strip clubs is the answer to the cost of living crisis. We are not telling that to men. Strip clubs open the door to sex selling for young women and sex buying for young men. The clubs recruit women as the product and men as the consumer. They are sexist and stand in the way of women's equality. The Local Authority should not be facilitating this. In continuing to license strip clubs, Bristol City Council's Licensing Committee is complicit in this sexism.

Licensed SEVs don't cut demand for underground sexual entertainment, they fuel it. The owners of Bristol's strip clubs market women as sexual entertainment to men through a range of 'services', including strippergrams. The existence of licensed clubs in our city centre opens the door to sex buying to men who would otherwise not seek it out. It sends clear messages about women's position in society compared to men's and legitimises the buying and selling of women's bodies for men's sexual gratification.

Locally, there have been notable efforts to tackle the sexist culture that underpins male violence, including the Never Have I Ever campaign by local university students, yet strip clubs remain unhindered at the heart of this harmful culture. We must change what we can, when we can. Today, the Licensing Committee has the power to stop enabling venues which exploit women and prop up the sexist culture that leads to male violence. If it does not take this opportunity, Bristol will never be a fair and equal city.

An argument for the retention of Sexual Entertainment Venues is that it provides a safer environment for women to work in the industry, and a nil cap would eliminate women's employment, and potentially lead to women working in less safe environments. As a HR professional with 13 years' experience in the field, I believe that this sets a very low bar for what work can and should be. The sexual entertainment industry is highly exploitative – women are self-employed, meaning that work is not guaranteed, and they have no right to employment rights including sick pay, holiday, redundancy, maternity leave, pensions ,or other rights (such as the recent furlough scheme). Furthermore, strip club owners have fought to keep this status quo – for example, Peter Stringfellow defended and won a claim against self-employed status in clubs (Stringfellow Restaurants Ltd vs Quashie). If a nil cap is applied, clubs would retain their alcohol and premises licenses, and could offer employment to women on more secure terms, as has been seen in previous examples of lap dancing clubs being converted to thriving businesses. Furthermore, there are a wide range of employment vacancies across the city, including council roles which tend to offer a secure range of benefits, including areas in which women are currently underrepresented. I would like to see the council supporting women to secure employment, skills and training to enable them to find secure, fair and fulfilling work in the City. A “fighting fund” could be established to facilitate this.

I am a specialist in gender equality, the prevention of sexual harassment and the prevention of violence against women and girls. My job is to advise leadership teams within public authorities and government departments in the UK as well as internationally, on the best evidence for what they can do to create positive culture change to foster good relations between men and women, and to prevent violence against women and girls. I am a member of the UN's International Roster of Experts for Ending Violence Against Women.

Members of the committee don't need to be reminded of the local and national statistics concerning inequality between women and men, boys and girls in Bristol, and they know that this is a national and local priority which is linked to the Licensing Objectives. I have been surprised to read, in the papers for this meeting, submissions which have claimed baselessly and perhaps disingenuously that there is no link between the relevant entertainment taking place in SEVs and gender inequality or violence against women and girls. The links are not simplistic but they are clear, evidenced and supported by peer-reviewed literature and reports from the most authoritative bodies that have dedicated huge research resources to addressing the issue of gender based violence. Violence against women and girls is the most significant human rights abuse worldwide, and it ruins lives. It has impacted – and continues to impact - on the lives of almost every Bristolian woman and girl - from gender stereotyping in nursery school through to sexual harassment of schoolgirls to domestic abuse, online abuse, rape and homicide. Social norms and stereotypes about gender, and men's sense of entitlement to the bodies of women and girls, are the causes of gender-based violence, which public bodies are tasked to help turn around.

There is no getting around the fact that SEVs very obviously promote men's entitlement to women's bodies and they also promote outdated, sexist and heteronormative stereotypes. It should go without saying that none of this is the fault of the women who choose to work in SEVs currently. Lung cancer rates in the population were not the fault of Bristolians who worked in the Wills Tobacco Factories, but the product they were helping to sell was the major cause. Coal miners are not responsible for climate change, but the product facilitated by their work is damaging wider society. The historical circumstance behind SEVs existing now in Bristol is not a compelling policy argument to keep them, as other local authorities have shown. An analysis of the consultation responses that have been supportive of the status quo indicates that hardly any address the central problem, which certainly should not be an 'elephant in the room': the problem is the socialised, sexist behaviour & attitudes of men towards women and girls – and the resulting harm and inequality. This is an issue of a harmful industry. It has been represented as one about women's work choices, with the men who choose to pay for sex and to exploit women in the sex trade eerily absent. When we know that men who pay for sex are more hostile, violent and sexist towards women in the sex trade and to women in their lives more generally, it is obvious that we should be actively discouraging men from becoming sex buyers - and not effectively normalising this behaviour.

Pro-status-quo responses do not tend to address how our city aspires to be more gender-equal, safe and welcoming to women and girls in the future nor do they address the evidence base for this, because that is not their concern. Policy decisions, such as that being taken today, look to the impact in the future .

If the Committee now implements a nil cap policy following consultation, Bristol will become a city free from SEVs and free from the damage they do to the cause of women's and girls' safety and equality. Other cities and local authority areas will follow. The reasons are clear and the Committee can point to the advice from experts, women's organisations, the PCC, to the views of many institutional stakeholders and city partners as well as to their commitment under all the local policies to promoting equality for all Bristol's citizens. There is no case for review or appeal. The premises currently in use as SEVs will have the opportunity to thrive under new incarnations whether as nightclubs, restaurant/bars, accommodation or any other purposes that are productive and profitable and that do not shore up the gender inequality in our city. The City Council should help with the change of use and should work with any affected current performers just as it would, and has, when taking numerous policy decisions affecting workers in other occupations and industries as the policy and industrial landscape of the city has changed and evolved over the years. Bristol City Council will no longer be seen to be actively condoning sexism in the city through its stance, in the face of the legislation that permits it to set and implement a nil cap as outlined in the revised draft policy for consultation.

Hi,

Please find below my statement to the committee on Thursday.

“I am a councillor for Central Ward, where both the existing Sexual Entertainment Venues sit. I am also Green co-shadow cabinet member for Culture, Communities, Equalities & Public Health. I sit on Bristol Women’s Commission. I am a nearby resident of the two existing SEVs.

I am also a survivor of sexual violence and know from first hand experience the risks to the safety of women, girls and those perceived female.

I have spoken at length to those who work in the SEVs in our city, to those in other cities with regulated venues and those working in NIL cap cities. Listening to their experiences and the dangers they face.

Our duty as a council and the duty of the licensing committee today is to ensure the residents, all of our residents, are kept from as much harm as possible. Prohibition and illegalisation of any substance or activity has never been proven to work, only drive it into the darkness. Moving to a NIL cap on SEVs in Bristol will only serve to push this work into unregulated spaces, creating an environment where the workers are put in dangerous situations. Covid lockdowns created a nil cap situation across the country, and still women were left with no choice but to continue working but in risky, dangerous situations. In cities like Exeter with a NIL cap, stripping and sex work still takes place, but it does so in unregulated locations without protection for the workers.

As a council and as a city we have a duty to ensure the safety of all those in it. We should be ensuring that those who work in the SEVs have all the protections that workers should have in our city. We should be focusing on strengthening those workers rights where we can do so.

Harassment of women, girls and those perceived female is a daily occurrence in our city, at every time of the day and in every part of it. We should be funding routes to support women out of sex work when they want to do so. We should be doing more to ensure that sex work is not the only viable employment available, especially considering how many are parents or carers. We also need to be doing more to increase the safety of women, girls & those perceived female in our city, focusing our efforts on the bars & clubs that don’t take it seriously. On the drink spiking that continues to surge. Our city venues are working hard to tackle these issues, and the intense focus on SEVs should be redirected to support this work.

I urge the committee to not endanger those working in our city and to vote to keep the SEV cap as it currently sits.

Councillor Ani Stafford-Townsend, Central Ward”

CLlr Ani Stafford-Townsend (them/they)

Green Party Councillor for Central Ward, Bristol
Green Co-Shadow Cabinet Member for Culture, Communities, Equalities & Public Health
Committee Chair for Development Committee B

To be summarised by Penny Gane, Bristol Women's Commission

SEVS AND WOMEN'S EMPLOYMENT

The UK has one of the least regulated wage economy's in the western world and the night time economy is rife with zero hours contracts, gig workers and exploitation from employers, as well as harassment from customers. The claim that SEVs offer rewarding, well paid work that benefits women is risible and entirely without basis. Few clubs treat dancers as employees or even workers, fail to offer sick pay, holiday pay or other benefits such as pensions. In addition, SEVs promote an outdated and heteronormative view of women's sexuality, driven by male desire and demand. They also promote unhealthy body images and shapes, perpetuating a fat-shaming culture. SEVs represent a world where only some women will feel empowered, but many will see as a source of misogyny and part of a world in which women only serve to please men

If Bristol City Council wants to promote quality, meaningful employment for women, they should focus on the provision of childcare, encourage Bristol businesses to adopt the Living Wage and support the West of England Good Employment Charter.

Joanne Kaye
Regional Secretary, UNISON South West

First off I want to say that I have no connection to the Sexual Entertainment or Sex Work industry. No one asked me to write this. I'm a software developer so there's absolutely no cross over in my professional or personal life where I would benefit from opposing the proposed nil cap.

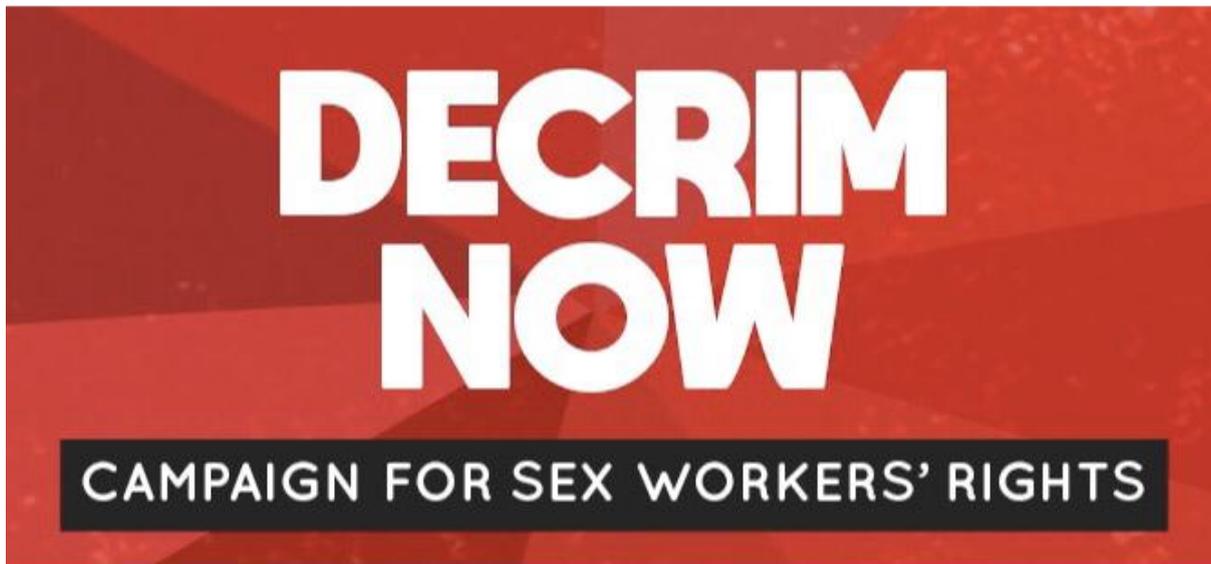
I'm writing this objection because I'm a woman that cares about the safety of other women. That's it. Despite claims made by BWC there's no media bias or patriarchal force pushing me into this. I'm speaking out because I'm tired of a misinformed minority group claiming they speak for me. The results of the public consultation clearly show the Bristol Women's Commission don't speak for the majority of women in Bristol.

Why have we made taking jobs away from women a priority issue in the middle of a cost of living crisis? This council supports harm reduction for drug use so why is that not being applied here? I'm angry so much council money and time has gone into this. We could have actually helped women in need with that money. Please can we learn from this so we don't keep repeating the same mistakes.

The existence of licensed regulated SEVs makes me feel safer as a woman since it cuts demand for underground sex work. The reality is you are never going to ban sex work. All you are doing is removing the safety net these women have. This picture BWC paint of a SEV free Bristol where sex work magically disappears and therefore abusers stop abusing is pure fantasy. Did the war on drugs stop drug use? Did Prohibition stop drinking? No. So why would sex work be any different? There's no concrete evidence that SEV's lead to higher rates of abuse but there's plenty of evidence showing criminalising sex work puts these women's lives in danger.

I want to remind Bristol City Council and The Bristol Women's Commission that Feminism means supporting the rights of ALL women, even the ones you disagree with. I urge the committee to listen to the women of Bristol and vote to keep sex workers safe. Scrap the nil cap.

Thank you,
Danica Priest



Displaced Strippers in Bristol - The Consequences

Decrim Now is a campaign run by sex workers, activists, academics and trade unionists calling for the decriminalisation of the sex industry in the name of harm reduction. We do not work with managers or pimps. The campaign was developed alongside United Sex Workers, a trade union branch, with the understanding that sex workers would be unable to demand rights, safety and dignity in a criminalised workplace. This report was prepared by a worker with experience of sex in unregulated workplace.

Unionised dancers have made their voices heard continually throughout this discussion, despite the fact that the majority of it has taken place over their heads. Nonetheless, it is necessary for the licensing committee to understand the demographic that they are impacting as they are making their decision. Per the council's own Equality Impact Assessment, 'introducing a 'nil cap' policy in any locality where there are existing SEVs is likely to have a disproportionately negative impact on the livelihood of predominantly female employees'. Further to this, the assessment stated that there was no specific way to mitigate this risk, and that it 'would need to be justified on the basis that the overall benefit for citizens outweighs the potentially negative economic impact on a largely female workforce.' The public consultation has already revealed that vast majority of local residents oppose the nil-cap, so there is no legal justification for a nil-cap.

There have been callous suggestions that dancers displaced by a nil-cap on SEV licenses should just 'get new jobs'. It appears to be necessary to remind the committee that these dancers are intelligent women who are best placed to make decisions regarding their own lives. None of them have entered the sex industry by accident. Instead, there are dozens of reasons for workers to favour sex work over traditional employment, including childcare/disability care needs, their own disabilities or health making it difficult to work full time, a need for flexible higher paid work to fit around education, or the ability to take weeks or months off due to personal needs. To take their chosen workplaces from them is to unequivocally rob them of their best option. To take their workplaces is to undeniably worsen their lives.

Once displaced, many of the workers will look to private dancing. Dancers are hired often to appear at private parties or stag dos. These are different to club engagements; they are one-off, informal events and as such there are typically no rules, CCTV or security guards to keep workers safe. Private dance engagements can take place in a client's home or hired function room, and usually involve a lone or small group of dancers outnumbered by the men who have hired them. In situations like this, there is a high risk of sexual and physical violence, with no safety measures in place for the workers.

Additionally, we know from countries with client criminalisation that a reduction in client numbers leaves sex workers unable to negotiate boundaries.¹ Private engagements do not provide regular employment, and dancers will still need to earn enough money to pay their rent and bills. Faced with sudden drops in income, workers become desperate and unable to maintain boundaries that keep them safe. Amongst full service sex workers, this means an inability to turn down clients who are seeking unsafe services such as unprotected sex. A dancer put in a similar position by the closure of her safe workplace may feel financially unable to refuse a booking with a client who makes her feel unsafe, or may be forced to accept clients seeking 'extras' or sexual acts because they cannot afford to refuse work.

To make this very simple: **workplace exploitation can only exist alongside desperation.** A worker who is able to set boundaries, demand rights and choose their workplace is infinitely safer by virtue of the fact that they have control. Only when someone is running out of options do they become susceptible to exploitation. By removing their safe options, the council will push dancers into more vulnerable and dangerous situations. There has not yet been any concrete plan to mitigate the danger caused by a drop in income.

By far the main driver into the sex industry is poverty. It is a fact that many of the displaced dancers will be forced to move into full service sex work, taking place either in illegal brothels or independently. In a 2021 research paper by National Ugly Mugs,² a charity which aims to prevent violence against sex workers, 46% of sex workers had experienced sexual assault and 22% had experienced rape. By removing safe and legal workplaces, the committee would be pushing workers into more and more dangerous working environments without their consent. It is imperative for the safety of all workers that they be empowered to choose their workplaces and earn money in a way that they are comfortable with.

¹ *Medecins du Monde, 2018, 'What do sex workers think about the French Prostitution Act?'*

² *National Ugly Mugs, 2021, 'Sex Workers Too: Summary of Evidence for VAWG 2020-24 Consultation'*

26 July 2022

STATEMENT: POTENTIAL ADOPTION OF NIL CAP POLICY BY BRISTOL CITY COMMITTEE

INTRODUCTION

1. The Committee today is presented with a unique opportunity to take a novel approach to SEV licensing that centres workers' rights, is evidence-based, and aligns with the outcome of the 2021 consultation. We urge the Committee to comply with the legal duties it owes to Bristol dancers and local constituents by refraining from imposing a nil-cap, or any cap, on Bristol SEVs.
2. We ask the Committee to ignore the demands of pressure groups and politicians who support nil-caps. This support appears to stem from a self-interested desire to progress political careers or to obtain further funding as so-called 'feminist' organisations. It is difficult to put into words the distress and pain our members have experienced due to these campaigns.
3. Your decision must be evidence-based and connected to a "legitimate aim". Yet, is absolutely no evidence supporting the claim that the presence of SEVs causes, or even correlates with, VAWG. Given the severe economic crisis, forcing hundreds of workers into precarity, unemployment, and poverty would be nothing short of an act of violence.
4. Both consultations showed unequivocal opposition to a nil-cap (66% in 2019; 88% in 2022). The consultations, and the SEV project spanning since 2019, have been at the needless expense of taxpayers. We understand that the Council paid a barrister fees of £9,500 just to advise the Committee in advance of this hearing. This money could have been spent on initiatives genuinely aimed at combatting VAWG, or alleviating the cost-of-living crisis.

GENERAL LICENSING SCHEME

5. We do not oppose the adoption of a SEV licensing scheme. Any scheme should centre workers by, for instance, promoting 'worker status', union recognition, and collective bargaining. We warn against a scheme that, due to the cost and difficulties of compliance, gives opera a monopoly over the industry and restricts the choice of workers over where and under what condition to work.
6. However, we strongly to the adoption of a 'nil-cap' policy. Our sex worker branch and other Bristol-based dancers have comprehensively explained to the Committee, both today and during the consultations, the harm that would be caused to SEV workers by a nil-cap policy. UVW's focus is the unlawfulness of such a policy.

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THE LAW

7. On 13 January 2022 we wrote to the Committee explaining that a nil-cap would constitute indirect gender discrimination and violate the public sector equality duty (“PSED”), contrary to the Equality Act 2010 (“EqA”). The Committee declined to respond.
8. If a nil-cap policy is adopted, UVW is committed to assisting its members in pursuing a judicial review challenge of the policy. The Committee will note that judicial review proceedings have already been commenced against Edinburgh City Committee in respect of its adoption in March 2022 of a nil-cap. UVW raised over £20,000 to cover our legal costs.
9. Below we set out some of the potential grounds of unlawfulness, including indirect gender discrimination, breached of the Public Sector Equality Duty (“PSED”), breach of the Human Rights Act 1998, and general common law grounds.

i. Indirect gender discrimination

10. Nil-cap policies violate section 4 and section 19 of the EqA:

- (a) Section 4 EqA sets out an exhaustive list of protected characteristics, encompassing “sex”; and
- (b) Section 19 EqA prohibits indirect discrimination. This occurs where a provision, criterion or practice (“PCP”):
 - (i) places those with a protected characteristic at a particular disadvantage compared to those who do not share the characteristic; and
 - (ii) the PCP is not a proportionate means of achieving legitimate aim.

(a) The protected characteristic

11. A PCP that disadvantages strippers automatically disadvantages women. As the Committee has recognised, almost all strippers identify as women. There is no requirement for the PCP to explicitly target women: it is enough for a PCP to have a “disparate and adverse impact on women” (*Allonby v Accrington and Rossendale College*[2001] IRLR 364).

(b) The ‘particular disadvantage’

12. Nil-caps disadvantage strippers and, in turn, women. The primary disadvantage is preventing strippers from working in a venue, occupation, and city their choice. This disadvantage poses a serious threat to their livelihoods, safety, and health of over 100 individuals, including strippers and other staff employed by SEVs.

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(c) Lack of justification

13. Indirect discrimination can be justified only insofar if it is (a) connected to a “legitimate aim” and (b) the policy is proportionately connected to this legitimate aim.

The legitimate aim

14. “Legitimate aim” is not defined within the EqA. However, it must equate to a “real need” (*R (Elias) v Secretary of State for Defence* [2006] EWCA Civ 1293). Crucially, the aim itself must not be discriminatory, and the aim must be “sufficiently important” to justify the discrimination (*Akerman-Livingstone v Aster Communities Ltd* [2015] UKSC 15).
15. A higher standard is applied when the PCP will interfere with a “fundamental right” (*de Freitas v Permanent Secretary of Ministry of Agriculture, Fisheries, Lands and Housing* [1999] 1 AC 69). The introduction of the PCP would interfere with the right to work free of discrimination under the EqA and protected by international law (Discrimination (Employment and Occupation) Convention, 1958 (No. 111))
16. It is wholly unclear what the “legitimate aim” of the PCP would be. Supporters of the policy sometimes claim that the aim is reducing VAWG. However, it is not hyperbolic to state that there is *absolutely no evidence* that the existence of SEVs correlates with an increase in VAWG, either in a specific geographical area or in general. There is evidently also no evidence of causation.
17. To the contrary, *evidence* shows SEVs are amongst the safest venues for female workers within the night-time economy. Under SEV licensing schemes, licences are renewed annually and impose strict CCTV and security requirements, alongside other stringent conditions such as non-contact rules between strippers and customers. CCTV is regularly reviewed by the police and the Committee to ensure compliance. All strippers undergo identity checks and must demonstrate their right to work. None of the existing SEVs are recorded by the police as source of concern for crime or trafficking.
18. The PCP would force most strippers into unemployment and potentially poverty. Most work in SEVs out of economic necessity and transitioning into other work would be difficult. Such hardship is likely due to stigma, the cost-of-living crisis, the housing crisis, the gendered impact of benefit cuts, childcare and studying obligations, disability-related needs, the decimated job market, and rising inflation. Bristol has one of the highest rates of people claiming out-of-work benefits, with female applicants far outnumbering men. Just this month, Bristol Council voted to pass a motion to acknowledge the cost-of-living crisis.
19. Strippers have emphasised that many would instead work at unregulated venues and private parties which do not benefit from established security and safety measures. Iceland, which has banned strip clubs, has several unregulated strip clubs and has one of the highest VAWG rates in Europe. Others will transition into full-service sex work, which attracts a much higher risk of harm. As the drug industry shows, simply making something illegal does not eliminate demand for the service or the economic need of those who provide it. It simply makes it more dangerous.
20. Furthermore nil-cap supporters do not support closures of nightclubs, where *evidence*

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shows VAWG overwhelmingly occurs. Workers have confirmed that, if a nil-cap is adopted, they are most likely to find formal employment at night clubs or bars. Given the high rate of sexual harassment and violence directed at female workers in these venues, this also suggests supporters of the policy are not genuinely concerned with eliminating VAWG.

21. On a similar note, taking away dancers' jobs will make them more likely to financially depend on romantic partners. Again, *evidence* shows that such dependency makes someone more vulnerable to VAWG.
22. Furthermore, in areas that have already implemented a nil-cap policy such as Chester, Exeter, and Swansea, there has been a rise in violent crime and assault, and no decline in VAWG. This is likely due in part to that those areas no longer benefit from CCTV and security staff outside of SEVs. In Chester for instance, there were 58 violent crimes in the year prior to the SEV Platinum Lace closing. In the year after closure this rose to 63, rising to 127 in the following year.
23. The existence of a "legitimate aim" must be shown by evidence (*R v Secretary of State for Employment, ex p Equal Opportunities Commission* [1994] IRLR 176). Strippers and those that oppose the PCP have highlighted this lack of evidence to the Committee on countless occasions. If the Committee decides to implement the policy regardless, this indicates an ulterior aim behind the PCP
24. We remind the Committee that discriminatory aims, such as discriminating against strippers out of moral aversion to the sex industry, are illegitimate and unlawful.

Proportionality

25. In the unlikely event that a court found there was a "legitimate" aim behind the PCP, the PCP would be wholly disproportionate. Per the Supreme Court (*Akerman-Livingstone*), proportionality requires:
 - (a) A rational connection between the aim and the discrimination;
 - (b) That the PCP is no more than "necessary" to achieve the aim; and
 - (c) That the PCP strikes a fair balance between the need to accomplish the aim and the disadvantage caused.
26. If the alleged aim is reduction of VAWG, requirement (a) is clearly not satisfied as there absolutely no evidence of a "rational connection" between this aim and the potential PCP. To the contrary, an overwhelming body of evidence exists showing the harm caused by nil-cap policies to strippers and, in turn, women.
27. Furthermore, requirement (b) is not satisfied. A nil-cap policy is a draconian measure that is unequivocally not "necessary" to achieve the reduction of VAWG. The Committee has not provided evidence showing it has considered alternative measures that could achieve its purported aim (*Homer v Chief Constable of West Yorkshire Police* [2012] UKSC 15), or showing it has taken steps to account for and minimise the disadvantage the PCP would cause to individuals affected (*Mrs A Hayes and others v Qantas Cabin Crew (UK) Ltd*: 3347009/2016). The 2021 Consultation showed that only 20% of consultees support a nil-

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cap policy.

28. Requirement (c) is also not satisfied. There is also no evidence showing that the Committee is seeking to strike a fair balance between its purported aim and the severe disadvantage that would be caused to strippers. The Committee has entirely failed to consult with the union to discuss SEV policy.
29. The need for evidence showing an attempt at a “fair balance” is greater when the disadvantage caused is “serious” (*Elias*): the disadvantage caused by the PCP would be extremely serious by removing the livelihoods of a large group of individuals. In assessing proportionality, a large amount of people potentially disadvantaged by the PCP will be held against the defendant by a court, and over 100 individuals would be affected in this case. (*University of Manchester v Jones* [1993] ICR 474).
30. In the circumstances, it is clear that (i) there is no objective justification for the PCP, and (ii) that the PCP is disproportionate. The PCP would thus amount to indirect discrimination under section 19 of the EqA.

ii. **Breach of public sector equality duty**

31. The Committee’s duty not to discriminate is accompanied by the PSED. Section 149 requires that the Committee must have “due regard” to the need to “eliminate discrimination, harassment, victimisation”, “tackle prejudice”, and “promote understanding”.
32. Per *Brown v Secretary of State for Work and Pensions* [2008] EWHC 3158, the Committee must consider the above duties and the impact on those with protected characteristics with “substance”, “rigour”, and in a manner that means “consideration will influence the final decision.”
33. The complete failure of the listen to strippers would show this has not occurred. A nil-cap policy would worsen socio-economic inequality. Support for such policies stems from intolerance, stigma, and prejudice.

iii. **Human Rights Act 1998**

34. The Committee is a public authority for the purposes of the Human Rights Act 1998. Section 6 makes it unlawful for it to act in a way which is incompatible with a Convention right, such as Article 8.
35. Article 8 can be engaged in work-based situations in 2 possible ways: (i) where a person’s private life is used in order to bring an end to their employment, or (ii) where actions at a person’s occupation have a disproportionate affect on their private life (*Denisov v Ukraine* (case 76639/11); *Platini v Switzerland* (case 526/18) at §§54-58).
36. If a nil-cap is adopted, the dancers will have their private lives completely overturned as a direct consequence. If they continue in their chosen job – many do so because of matter

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such as the flexibility and working hours that it affords them – they are faced with no option but to work in more dangerous settings or leave the city and find that work elsewhere. The latter would mean having to uproot their homes, their families (including their children), and leave behind their social support structures in the form of wider family and friends. The only other option available to these women is to remain in Bristol but to try to find alternative employment in a different industry than the one in which they have chosen to work, or to depend on benefits given the current job market. For many of the women affected, they will face questions about either (i) the perceived gaps in their work records, or (ii) discrimination on the basis of what they have done for a living. Either way, the women have had their private lives thrown into disarray, have had their financial independence and stability ripped from them, and have been left with nothing but empty platitudes from the respondent.

37. As discussed, there is no evidence that this interference with Article 8 would be in accordance with the law, is in pursuit of a legitimate aim, and that the actions taken go no further than is necessary to achieve that aim.

iv. Standard grounds of judicial review

38. The Committee's SEV project has spanned from 2019. Two consultations have taken place, with both showing only minority support for a nil-cap. It is extremely difficult to see how the cost to taxpayers, alongside the harm and distress caused to dancers, is justified.

39. The first consultation showed that 66% of the public oppose a nil-cap and the second shows that 88% of the public now oppose it. If a nil-cap is passed regardless, we are concerned that the Committee will have ignored relevant factors in favour of irrelevant factors. Furthermore, the entire process has been plagued by a lack of transparency and failure to engage with affected individuals.

40. Any nil-cap is likely to therefore also be challenged on the grounds of being ultra vires and procedurally unfair.

Statement in Support of a Nil Cap on SEVs in Bristol

Full name of Supporter: The Parochial Church Council (PCC) of St Stephen's Church

Full postal address: St Stephen's Church, 21 St Stephen's Street, Bristol BS1 1EQ

Contact telephone number: 0117 927 7977

Email Address if appropriate: info@saint-stephens.com

We are hoping that councillors will have the courage to take this decisive step. It would send out a sign that the city recognises the huge public concern about women's safety and in recognition of how the objectification of women is at the centre of the ethos and practice of all SEVs. Everything about SEVs sends a contradictory message about the inequality of women. The fact that some women have chosen freely to perform in this way does not lessen the fact that many would rather have other choices and that some will have been forced into that role.

How can the council be concerned to make the old city an enhanced tourist attraction and not take the step of removing SEVs? Look at the entrance to St Stephen's street: you have stencilled lovely flowers to indicate these paths into the old city area and yet a few feet away is Central Chambers. Where is the logic in that? Is that the kind of tourism councillors want to encourage?

Location is stated to be one of the valid points to influence your decision and we have on several occasions pointed how that as a place of worship we are in the same street and are listed as a valid reason not to have a SEV in our vicinity, Both SEVs are currently in easy walking distance of at least 5 places of worship.

We fail to see how Bristol can truly claim to be a White Ribbon City and a City of Sanctuary until you set this nil cap. Stand up and be counted across the nation as a brave council who made a clear choice to eradicate this blot on the city's image.

Dear Licensing Committee

We'd like to submit the following statement ahead of the hearing on Thursday:

Bristol Women's Voice is a charity working to make women's equality a reality for all women in Bristol. A key priority area for us is improving women's safety and ending male violence against women and girls. We know that to do this we must end the culture of entitlement, sexism and misogyny that underpins these actions: attitudes that remain ingrained across society.

As an organisation, we have worked with private companies and public services including transport and the police to shine a light how sexism influences men's behaviour. We support organisations to recognise and challenge the sexist attitudes and stereotypes that encourage men to assume they are more entitled than women: more entitled to take up space in public, more entitled to be listened to, more entitled to make the decisions, and more entitled to be serviced by women in a multitude of ways that include domestic labour and through sex.

Sexism and misogyny impact on women's safety and feelings of safety, every day, as the #metoo movement starkly reminded us. Drawing direct lines between one act and another on the continuum of sexual violence is not always possible because there is a cumulative effect of cultural norms, reinforcing behaviours between men and environmental supports that encourage and allow for misogyny. Small acts/micro aggressions - a wolf whistle or being shouted at in the street – are a reminder that women aren't safe and that they are sexual objects (Meyrick, J. 2022). They are a reminder of the possibility of greater threats, which in extreme cases can include unwanted touching, sexual assault, murder even. (It is worth noting that misogyny kills more people than all other hate crimes put together).

The best way to prevent this is to change the cultural norms that condone it; to work with young men and women to teach equality and to create societal norms that model this equality. Strip clubs on the high street normalises the sale of women's bodies and men's right to buy them. They are businesses established to profit from the sale of the sexist stereotypes we work to deconstruct. They are counter to teaching of sex-based equality for young men.

We know strip clubs supply women and provide customers for further aspects of the sex industry. The evidence between the mainstream sex industry and harms against women and girls, both working in it and across society, is consistent and irrefutable.

BWV strongly support women's right to quality, flexible, well-paid employment and we especially recognise this is lacking for women with caring responsibilities, but we call upon the Council not to reinforce this damaging assertion that the sex industry is the answer.

Bristol Council's continued licencing of SEVs gives the green light to the institutionalised sexism that is SEVs' core business. It would make mockery of Bristol as a signatory to the Chart of Equality between Men and Women in Public life and would fail to account for the Council's duties to all women and girls under the Equality Act 2010.

Katy Taylor
Director
Bristol Women's Voice

*Statement be read in my absence by Chair of Bristol Women's Commission Penny Gane as part of Public Forum statements section please**** As a working class bisexual mother of two, I have grown up in a world surrounded by male violence, sexism, prejudice and crushing inequality. I come from a regressive, conservative town in the South West where I experienced first-hand the harm that strip clubs cause. My hometown has no cap on strip clubs and I've seen male and female friends pressured into going to these places thanks in large part to the sexist lads mag culture of the 90s and 00s which I'd hoped we'd moved on from. I've seen friends drawn into working in these places, seduced by the thought of earning more money than other part-time jobs, later unable to escape and pushed into full prostitution.

Since moving to Bristol 15 years ago, working a number of part-time and freelance jobs and volunteering with community organisations, I've felt part of a progressive city with inspiring women leaders, including MPs and the first Police Crime Commissioner, the existence of a Woman's Commission dedicated to tackling inequality, national women's charities with their HQ in Bristol, a community of doers. If any city could get a handle on tackling women's inequality, I firmly believed that Bristol would be it. Now, I'm not so sure.

The consultation and online discussion surrounding this issue shows that women's equality clearly means different things to different people. For some, it's the 'freedom' to sell your own body when you need the money. For others, it's freedom from sexist stereotypes, sexual objectification and male violence. When considering its Public Sector Equality Duties, Bristol City Council should not succumb to the former - it should instead be pursuing the latter by tackling prejudice (sexism promoted in strip clubs) to foster good relations between women and men and investing in flexible employment opportunities for women which do not harm society.

As the global sex industry thrives in the Internet age, the 'sex work is work' rally cry gets adopted by an entire generation, many of whom enter the sex industry with the defeatist logic of: 'I'm going to be objectified anyway, I may as well make money from it'. I get it, as a lifelong low earner working multiple jobs to make ends meet, it's tempting to believe the lie that sex work is 'just like any other job' and is actually empowering for women; but the evidence and testimonies from those who've escaped it and reviews from punters tell a different story, as does the power imbalance between the club owners and workers.

They'll say you will never get rid of sex trade, it's the world's oldest profession. Wrong, it's the world's oldest oppression - and no matter how much we're told it's empowering for some women such as those who 'choose' to work in strip clubs, it is not. The global sex industry causes untold harm to millions of women and girls across the world both directly and indirectly. This industry is thriving, thanks to societal acceptance - of which the issuing of licenses to strip clubs plays a part - encouraging more men to pay for sex.

In propping up strip clubs because of the so-called work opportunities for some self-employed women, Bristol City Council is sending a clear message to all women and girls about their place in society - subservient to men - and to men and boys about their entitlement to sex. This is exactly what leads to male violence, and there is no way the Council should be signing off on it.

**Statement to Bristol City Council Licensing Committee July 28 2022
From Fair Play South West**

Diane Bunyan, Sue Cohen, Dr Hilary Land, Dr Jackie Longworth, Dr Su Maddock, Dr Margaret Page:

Proposed nil cap on SEVs

Statement presented by Dr Penny Gane

Fair Play South West strongly supports the proposal to impose a nil cap.

Those in favour of SEV's, base their case on support for 'women's jobs'.

BCC's EQIA appears to agree with this approach. But all forms of work are not equivalent. Sexual entertainment is not equivalent to piloting a plane, working in hospitality, caring for people in a care home or nursery, brick laying or working in IT. Different skills are involved, and a different relationship with customers.

The EQIA states that SEV's show a 'positive impact' for 'sexual orientation'. But the consultation results clearly show that while gay men who responded to the consultation seem happy with SEVs, lesbians clearly do not. As women, lesbians are also subject to sexual violence, sexual harassment and sex trafficking by men, all of which have been shown to be linked to the Sexual Entertainment industry.

Sexual entertainment is just that, entertainment designed for male sexual titillation and gratification, and requires those who work in it to conform to harmful stereotypes about women's bodies and their availability for consumption as sexual objects. While there may be short term financial gain, many women working in the industry testify that the work has harmed them in the longer term.

If supporting employment opportunities and education for women and girls were to be seriously addressed, the council would do well to consider what kind of employment is consistent with Bristol city's commitment to addressing poverty, and providing rewarding work opportunities for young women, in a context of Zero Tolerance to sexual harassment and gender based violence.

Adopting a nil cap on SEVs sends a positive message to girls and young women and offers an opportunity to look at the wider picture of potential for women and girls, including lesbians. This is the only choice compatible with legal obligations to promote 'good relations' between communities with protected characteristics', and with the City's Zero Tolerance strategy.

United Sex Workers (USW) Union statement to Bristol City Council Licensing Committee on the proposed nil-cap policy

Today, the licensing committee has been provided with an opportunity to take a progressive, evidence-based approach to SEV licensing, which protects the rights of the workers at its core. Instead of restricting the choice of workers over where and under what condition to work, all licensing schemes should center workers, and promote access to worker protections, union recognition and collective bargaining. We urge the committee to listen to the expertise of the workers who will be most affected by this proposed policy and are most familiar with their own working conditions, the very same workers who have comprehensively and repeatedly explained the harm they will face if this policy is implemented for the last two years.

The nil-cap policy is an issue of safety, the safety of the workers, the majority of whom are women, who work in Bristol's two operational SEVs. There is no evidence supporting the claim that the presence of SEVs causes, or even correlates with, VAWG either in a specific geographical area or in general. In cities where nil-cap policies have been implemented, there has been no reduction of violence against women, yet the risk of violence sex workers face has only increased. As the drug industry shows, simply making something illegal does not eliminate the economic need of those who provide it, it simply makes it more dangerous. Iceland, which has banned strip clubs, has several unregulated strip clubs and has one of the highest VAWG rates in Europe.

Forcing over one hundred workers into unemployment and poverty within a cost of living crisis however, is nothing short of an act of violence. Just this month, Bristol Council voted to pass a motion acknowledging the cost-of-living crisis, recognising that it disproportionately affects women. Bristol has one of the highest rates of people claiming out-of-work benefits, with female applicants far outnumbering men. Strippers work in SEVs out of economic necessity, and as the very discussion around this policy evidences, if the nil-cap is implemented, they will struggle to transition into other work due to stigma; alongside the impact of the cost-of-living crisis, the housing crisis, the gendered impact of benefit cuts, childcare and studying obligations, disability-related needs the decimated job market, and rising inflation.

Strippers have emphasised that many would instead have to work at unregulated venues and private parties which do not benefit from established security and safety measures that make the clubs safe for them to work in. Stripped of their legal workplaces, they may have to turn to riskier and criminalised sex work to survive. In order to avoid poverty or dangerous working conditions, those that can afford to do so may have to uproot their lives and move away from their families and support networks. Removing women's financial independence could force them to rely on a partner, leading to greater risk of abuse.

It is not within the committee's remit to decide where and in what job women can or cannot choose to work. It is our belief a nil-cap would constitute indirect gender discrimination and violate the public sector equality duty, contrary to the Equality Act 2010. If a nil-cap policy is

adopted, we will be assisting our members in pursuing a judicial review challenge of the policy. We have already commenced judicial review proceedings against Edinburgh City Committee in respect of its adoption in March 2022 of a nil-cap.

The nil-cap policy is draconian in both eroding the rights of workers and of women, and risking the safety of women for no discernible pay off other than causing harm to sex workers. It is a policy that lacks any base in evidence, and any public support outside of a minority of pressure groups more concerned with respectability politics than women's safety. Public consultations in 2019 and 2022 both showed unequivocal opposition to a nil-cap (66% & 88% respectively). Despite there being no drive from your residents for a nil-cap policy, it is the taxpayer who has funded both consultations, and the SEV project beginning 2019. The Committee paid barrister fees of £9,500 to advise in advance of this hearing. This is money that could have been better spent addressing issues like Bristol's housing crisis, or making meaningful attempts to tackle VAWG, instead of attempting to further remove the very few rights a marginalised workforce have access to.

Dear licensing committee,

As a disabled person, being able work in the strip clubs in Bristol has been life changing to me. When my disability forced me to leave university, being able to work in the clubs when my health allowed meant i was able to remain financially independent and survive without a student loan, and was able therefore able

to remain living in Bristol. My health means i wouldn't be able to work in any other industry as i need the flexibility and freedom that stripping provides, as often times i am physically bed bound and unable to move due to chronic pain and fatigue, or am experiencing autistic burnout and severe mental health issues that stop me from functioning. In no other job would i have the ability to rest when i need, without loosing my job. My mental health especially has been something that has severely affected me for as long as i can remember, and has impacted my education, social life, and ability to hold down a job. I have never seen a future for myself that didn't end in poverty, hospitalisation, or suicide, because i never thought i would be able to survive in a world designed for neurotypical, mentally well, able bodied people. Working in strip clubs has made me realise i do have the means to survive, and not only just survive, but provide myself stability and opportunities for the future. To impose a nil cap and take away the workspaces in which we feel safe would take away accessible work for disabled people, and so many other marginalised women and people, specifically during a housing and cost of living crisis. Removing our work spaces would not remove our need for the industry, it would just further limit our options in a world that is already limited to us. I have always felt incredibly safe working in the clubs here, and although my reasons for being in this industry are purely out of survival, i feel incredibly lucky to have found a form of work that i feel comfortable and protected doing. The thought of loosing that absolutely terrifies me, and i don't know what i would do without it. It is disgusting to me that so called 'feminists' who refuse to listen to the voices of the people working in SEVS, and ignore the opinions of the general public that overwhelmingly disagree with a Nil Cap, can so boldly try and take away our livelihoods and safe workplaces, whilst claiming to want to fight violence against women and girls. Regulated SEVS are a form of harm reduction, and without them vulnerable people, largely women, will be pushed into unsafe, unregulated conditions, without the safety and security the clubs provide. Enforcing a Nil Cap is an act of violence against women, not a fight against it.

Scarlett

Dear Licensing Committee,

In March last year, this council voted to send the decision over whether to implement a nil cap to a public consultation. This was despite 2/3 of the public opposing the closure of SEVs just two years previously. Both consultations have been expensive, costing thousands of pounds and taking up precious time. In his election manifesto, the mayor promised to close the clubs if he was elected, and he has certainly tried. He has used sex workers as a political pawn, throwing them under the bus to appeal to council-funded and unrepresentative feminist groups.

Anti worker groups often focus on the sex industry being exploitative to the women who work in it. It is true that exploitation occurs - as it does in all industries. However, somehow the solution is never to abolish other industries or to tell their workers to just get another job. Instead, most people recognise the workers' need to fight for better working conditions and fairer compensation. The Health And Safety at Work act of 1974, which ensures the right to a safe workplace, includes self employed workers. And regardless of what some people may think - sex work is work. SEV dancers have worker status as set by the outcome of *Nowak v Chandler* in 2019. It is time this was respected and upheld.

This council recognises harm reduction to be the best approach to cutting the negative effects of drug use. This principle should also be applied to our jobs. The BWC claim that there is no evidence of sex work being pushed underground where nil caps are present. This is simply untrue and can easily be debunked by speaking to sex workers who have worked underground during the pandemic or in nil cap cities.

Sex work is a predominantly female industry, with a disproportionate amount of workers being amongst the most marginalised in society. This council claims to be committed to supporting working class mothers, disabled people, and the lgbtq+ community. The irony in attacking the livelihoods of a workforce made up of these demographics is not lost on us. This is compounded by a cost of living crisis that this council has recognised will cause disproportionate suffering to women and disabled people. Meanwhile, our child poverty rate is the highest in the South West. Disability payments, child support, and universal credit are insufficient to even cover most people's essential living costs. Taking away women's financial freedom will open them up to violence as they will be forced into working in less safe conditions. Financial control is also present in 1/3 of domestic abuse cases, with women forced to be economically reliant on a partner.

Since the current SEV licensing was set out in 2011, there have been no licensing breaches at either of the 2 clubs. There is an extensive set of conditions that the clubs have always adhered to. A significant number of Bristol dancers are members of the United Sex Workers and we hope that going forward, the council works with the dancers to create a progressive SEV policy

that centres the workers' experience and voice, as dancers in Camden have already done with the help of the union.

The past year and a half has significantly affected our members' mental health. This process has gone on for far too long. We hope this committee respects democracy and allows them to work in peace, without subjecting them to this again. This decision needs to be made with regards to workers safety, not people's personal discomfort and moral objections.

Kind Regards,
The Bristol Sex Workers Collective

Dear licensing committee,

Dancing has given me financial freedom. It has also allowed me to support my chronically unwell mother as she recovers from the financial repercussions of the pandemic.

In the 5 years I have lived in Bristol, I have been sexually harassed on many nights out, like virtually every single person I know. And the main culprits have often been the same venues in certain areas. This council should be refocusing the thousands of pounds and countless man hours they've spent running 2 consultations in 3 years into tackling the high rates of violence against women in nightclubs and on campuses.

The argument that SEVs pose a threat to non sex working women is not only untrue and lacking evidence, it is also cruel as it blames sex workers for the violence carried out by men and suggests that we do not also deserve protection.

Unrepresentative minority feminist groups do not speak for all women and they do not speak for the 5400 people that said they disagree with a proposed nil cap. I cannot overstate the devastating impact a nil cap will have on the people in my community. I hope this council respects democracy today and centres the workers going forward by working with us to create a more progressive policy. Bristol has always been a progressive city and it's time for the treatment of SEVs to reflect that.

Kind regards,
Layla

31

Please find below a statement which I would like to read out during the public forum section of the licensing committee meeting tomorrow.

Thank you

Statement:

My objections to SEVs have always been on the basis that they reinforce gender inequality and contribute towards negative attitudes towards women and girls. However well run a club is deemed to be, their very presence in a city centre, licensed by the council, speaks volumes about the status of women in society still.

Under the Public Sector Equality Duty, you have a responsibility to make decisions that protect all women and therefore I urge the committee to listen to the experts and to support a nil cap. I would also like to remind the committee that wanting to minimise negative attitudes and violence against women and girls is not, and should never be considered, a “moral argument”.

I would also like you to understand how hard it is to stand here and speak to you today. I have personal experience of being targeted for supporting a nil cap. Just over a year ago, a small animal charity at which I'm a volunteer was contacted separately by two lap dancers who tried to get me sacked as a volunteer there. This was an incredibly upsetting incident for both me & the charity and I had to send a cease & desist email to the two women involved. However, I am sympathetic to the worries of women who may need to find alternative work if a nil cap is implemented and I understand the dynamic of wanting to blame those advocating for this. If a venue loses its SEV licence, it would still have a premises and alcohol licence and could run as a different type of establishment – one that is welcoming to all and one that could still employ a large number of the people who are employed by the clubs now, with support for those who couldn't transition into a new role.

I would like to know:

1. Why are the lawyers, who are paid vast sums by strip clubs to represent them (many appearing to be on 'retainers'), *also* providing 'training' to councils, including a providing a recent briefing to Bristol?

These clearly are not independent nor impartial individuals.

Whatsmore, they are on the record for **frequently misdirecting councils at licensing hearings**. This is despite the fact that, under SEV legislation, it is unlawful to knowingly provide false information.

Yet strip club lawyers routinely misdirect councils that:

- a) There must be a **CHANGE in location in order to refuse a license**. THERE DOES NOT.
 - b) There must be some kind of **'EVIDENCE' (of harm, impact or something else)** in order to refuse a license. THERE DOES NOT.
 - c) An obscure case in Afghanistan proves that **equality law is 'irrelevant to strip clubs'**. INCORRECT.
 - d) The barrister who represents Bristol's clubs even made public the name of an objector, despite reassurances this would not be done because of the abuse she may receive. If these are the legal experts who advise the council, lawyers who cannot even adhere to the most core and basic tenant of the legal profession – confidentiality – **how on earth are they fit to advise the council on anything?**
2. Why, at the same time have no meetings with women's equality experts or violence against women groups been held? Safe and Equal Bristol's comprehensive report on the harm of SEVs has not even been made publicly available. *Has it even been read?*

Not Buying It has also provided comprehensive information about the harms of the industry:
<https://notbuyingit.org.uk/stillstrippingtheillusion>

And the impossibility of creating an Equality Impact Assessment (EIA) to mitigate these harms: <https://notbuyingit.org.uk/stillstrippingtheillusion>

All this too has been steadfastly ignored. Why?

it's like buying a piece of meat"

"It's great to have that kind of power and control"

"With all this sexual harassment stuff going around these days, men need somewhere to go where they can do and act like they want"

"You are never allowed to touch the girls .. the anger and frustration builds up inside you .. it grabs your throat"

These are quotes from punters, via Safe and Equal Bristol's report on SEVs.

How can you possibly ensure these men behave like 'Gentlemen' inside a strip club? (by the way there was a sexual assault so serious at a Bristol club it resulted in a court case).

Even if you somehow magically can – you can't possibly control their behaviour or their attitudes when they leave. And they leave drunk, sexually aroused and with a huge sense of sexual entitlement.

There is abundant evidence including from the Home Office and UN that the attitudes strip clubs instil are totally incompatible with your **LEGALLY BINDING** equality duties – which apply to *all* women, not just those in the clubs:

- MRI scans show that objectified women are viewed with the part of the brain that recognises objects/things NOT human beings

- Objectification is linked to severe intimate partner violence

- Men who objectify women are less likely to view rape as rape

- 75% of rapist state sexual entitlement was their prime motivator

- Male entitlement is the most common motivator for rape

- Sex buyers are more abusive towards women

- Strip clubs drive the demand for prostitution

- 1/3 of Scottish sex buyers accessed prostitution via strip clubs

- Most lap dancers go on to start selling sex whilst in the strip industry

- “Lap Dancing Groomed me for Sex Work”: Bristol woman

PCC statement for submission and reading to Licencing Committee hearing on SEVs nil cap on July 28th 2022

- Over my first year in office I have held engagement meetings with many people from many different communities.
- This has involved conversations with members of Bristol's business community – including the owners and employees of Bristol's licensed Sexual Entertainment Venues.
- It has also included other groups and individual stakeholders with an interest in the licensing of these venues – such as the Bristol Women's Commission.
- I agree that women should be able to do what they want, when they want, how they want
- We need to be empowering women to make decisions that empower themselves socially, financially and culturally.
- However, as part of this empowerment, agencies need to focus on a bigger conversation around changing the behaviours of men in order to make our communities safer and society a more equal place to live for all women and girls.
- After the many conversations I've had, with groups and individuals who have a range of varying views, the one thing that is clear to me is that the power in the dynamic within this industry is firmly with the purchaser.
- We have to look at wider issues regarding misogyny and violence against women.
- I am in agreement with Bristol Women's Voice and Bristol Women's commission that these venues reinforce gender stereotypes and normalise the objectification of women.
- This is why I added my name as a signatory in support of the Nil Cap campaign.
- Along with the other signatories, I want our communities to be a fair and equal place that does not tolerate violence against women and girls.
- As part of this complex campaign, I'm aware that opinions of strip club workers have been pitted against the position of women's right advocates – this is unfortunate and does not meet either group's needs.
- SEVs in Bristol are treated as part of the night-time economy and normalise the purchase of women's bodies.

- I'm aware that the two existing SEVs in Bristol are compliant with the current Bristol City Council licencing regime and the performers I spoke with expressed that they felt safe and in control working within these premises.
- This isn't about removing individual women's rights to earn a living nor is it about making women responsible for men's behaviour.
- It's about changing behaviours of men and starting conversations to make our cities a more equal place to live – it is only by taking such bold preventative steps that we will ever turn the tide on male violence against women. It is part of a much bigger cultural shift. We shouldn't lose focus of the bigger picture.
- I know some of the dancers I spoke to expressed concerns about wider issues of unregulated environments that some women work within.
- The risk of more women working in these unregulated environments as a result of a nil cap coming into effect is concerning.
- Should a ban on all SEVs come into effect in Bristol, I would like to see all the partners involved working together on a comprehensive exit strategy that offers support and advice services to those impacted

PCC Mark Shelford
Avon & Somerset Constabulary.

Please ensure these documents are included within the documentation and have been read in full by the committee before any decision is made:

Safe and Equal Bristol's report on SEVs:

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

Short briefing on SEVs: <https://notbuyingit.org.uk/stillstrippingtheillusion>

Legal Briefing on SEVs/Equality Law: <https://notbuyingit.org.uk/striplegal>

EIAs & strip clubs: <https://notbuyingit.org.uk/eia>

The founders of our women's rights group, Not Buying It, ensured SEV legislation was created and have worked closely with survivors of the strip trade for over a decade. As such, we are expert in the realities and harm of the industry as well as SEV legislation and equality law.

And we believe this consultation and any decision that enables the strip industry will be found to be **breaching equality law and SEV legislation**, just as your council has been warned of over previous drafts.

Whatever claims are made by the sex trade lobby, the fact is that you are **unequivocally entitled to introduce a zero policy**, as is stated in Home Office guidance to SEV legislation, as reaffirmed by judges and other legal experts and through case law. This is regardless of whether strip clubs already exist: (<https://notbuyingit.org.uk/striplegal>)

By not introducing such a policy, Bristol Council yet again faces the prospect of creating an unlawful policy.

Bournemouth, Christchurch and Poole (BCP) Council is currently being **taken to the High Court precisely because it appears to have written its policy around the presence of existing clubs.**

BCP is further being challenged because it **ignored the harm of the strip industry.** Whilst **Sheffield City Council has already lost 2 successful High Court** challenges on these grounds.

Bristol City Council too could face challenge in the High Court if it is:

- a) **Not paying due regard to equalities and violence against women groups**
- b) **Writing policy around existing strip clubs**
- c) **Giving undue weight to those in, representing or supporting the strip industry with a clearly highly vested interest to maintain, or even expand, the strip and sex trade and who are clearly informed by misinformation, bias and fear mongering.**

no@notbuyingit.org.uk

www.notbuyingit.org.uk

I have lived experience of the sex industry and now work with support groups for women from the industry. I have interviewed close to 100 women who have escaped the sex industries including lap dancing.

You need to know that women in lap dancing show denial and cognitive dissonance – this is when you believe something which at the same time you know is not true. They show ‘higher loyalties’ to the club and extreme condemnation of all who object.

Many are victims of abuse, including childhood abuse. Lap dancing seems ‘empowering’ because you feel you are now being bought ‘on your terms’.

And all have been groomed by society so that their entire sense of self worth comes from being sexually attractive to men. So being paid for it is surely the height of empowerment.

Some feel utterly worthless and that they can’t possibly do anything else.

This explains why lap dancers are telling you they can’t possibly do anything other than strip – even though at the same time they tell you how ‘empowered’ stripping has made them, that they already have other jobs, degrees. Even though there are numerous other job opportunities in Bristol.

It’s why they tell you it’s ‘the only flexible work’ that can possibly suit them. Even though clubs dictate exactly which nights they may work, what they must wear, how they must behave. Even when they must work all night in emotionally and physically exhausting work

and often not make a penny. Even though they then have to switch to 'day time' living and then take on their caring responsibilities, go to their other job or their university studies.

It's why they are telling you that the industry will 'go underground' even when the owner of Bristol strip clubs has long been sending lap dancers to 'private parties' in men's homes. And many lap dancers, including at Bristol, already work in other branches of the sex trade and only do so because they were stripping.

This is why you must end this deeply harmful industry AND why you must support all lap dancers emotionally and practically when you do.

LF

Thank you for the opportunity to respond to Bristol City Council's SEV policy review.

I am making this submission as a woman and as a resident of central Bristol. Although I am now semi-retired, during my working life I undertook a number of research projects during the late 1990s and early 2000s, for the Department for Transport into crime against women and their perceptions of safety on public transport, while waiting for public transport, and in the pedestrian environment.

As a woman, the existence of SEVs is personally offensive to me. The notion that women exist to provide sexual entertainment for men runs directly counter to equality and mutual respect between men and women. SEVs are exploitative and degrading to the women who work in them and their existence sends a message that is oppressive to and disrespectful of all women.

The presence of SEVs in Bristol makes a mockery of the 'it's not OK' posters that I have seen around Bristol's Women's Safety Charter.

As a resident living in central Bristol, I want to be able to feel confident walking out at night. I want my daughter and her friends – young women in their twenties – to be able to walk through the city centre late at night without anxiety or intimidation. Bristol's own Women's Safety Charter recognises that 'being out at night can induce anxiety for many women, with most women surveyed having experienced some level of harassment'. In my view, that risk is heightened by the presence of men who are in the area specifically for sexual entertainment.

I would like to see the Council demonstrating its commitment to women's equality by taking active steps to support those women working in the sex entertainment industry to find employment that is respectful of them as women, financially and emotionally rewarding, and sustainable into later life.

I therefore fully support the proposal for a nil cap policy on SEVs in Bristol because their presence is harmful to women's equality, safety, and enjoyment of life in the city after dark.

Julia Stafford

In Bristol, the sex trade lobby have waged what can only be described as a campaign of threat, intimidation and censorship:

1. A local woman has been **cyber stalked** by members of the local sex worker collective with attempts to get her **dismissed** from the charity she supports. **Pornographic images** were also placed on the charity's facebook page.

2. Local and national organisations, their staff and volunteers have been **vilified, libelled and threatened including via the media, in books and via several threats of legal action and even in court cases.**

3. A **libellous petition based on misinformation and fear mongering**, targeting local MPs and other public figures has gained 1000s of signatures, fuelled by extensive one-sided media coverage. Similar hysteria and misinformation has been directly spread by the *owner* of Bristol's strip clubs.

4. Now the **sex trade lobby is threatening the council with legal action** should it dare to introduce a zero policy on the absurd grounds that doing so is somehow anti equalities, despite the exact opposite being true.

Edinburgh Council was similarly threatened after it introduced a zero policy, although **no proceedings appear to have been initiated** within the required 3 month time frame.

The sex trade lobby is literally trying to hold councils to ransom.

Yet if you bow to this pressure you will be **breaching SEV and equality legislation.**

The legal action you *should* be concerned about is not by the sex trade lobby but by local people. As they are the only ones with the law on their side.

Speaking as a man who has worked for the last 15 years challenging male violence against women, I would like the committee to consider the issue of how the objectification and commodification of women affects the attitude and respect which men have towards women in their lives. In my opinion any opportunity provided for men to pay for "sexual entertainment" leads to a feeling of entitlement and expectation from men and directly leads to their blurring issues of Consent and lessening in the minds of those men of a woman's right to say No. This has direct consequences for sexual harassment, and probably sexual assault.

Yours sincerely

Chris Green Founder White Ribbon Campaign
Co-Founder Make Allies Challenging Sexism

--

Chris Green O.B.E. (Equality)
Founder White Ribbon Campaign UK,
UN Leader of Men

I give permission for a member of Bristol Womens Voice to read out this statement

Thankyou Chris Green from Male Allies Challenging Sexism

In 2004 I founded the White Ribbon Campaign in the UK, working to engage men in challenging men's violence against women and girls, and was active in the organization until 2020.

In the past, the City of Bristol has been one of many important supporters of this work, becoming accredited to White Ribbon standards as early as 2013.

Because of the important message that the presence of sex entertainment venues gives about the objectification of women and girls, white ribbon accreditation has as a requirement that local authorities must be working towards achieving a zero cap on sex entertainment venues. Although the authority may no longer be accredited to White Ribbon, I would expect the council still to be upholding the same standards.

Bristol must have regard to its public sector equality duty that requires it to consider the impact on all women of the existence of this kind of establishment based on male sexual gratification.

Paying for lap dancing normalises the practise of men paying for sexual services which has an impact on demand for other aspects of the sex industry, and on the local community.

I also write because it is unusual for men to publicly declare their opposition to sex entertainment venues. It is easier to do nothing, to carry on with our existence in an unequal, dangerous, discriminatory world for women and girls. Yet I am aware that

when I ask male friends, or when women challenge my male friends about the presence of sex entertainment venues, they agree that such venues contribute to the culture of objectification.

Derogatory and abusive treatment towards women in the lap dancing industry is extremely common. Workers in the industry, once they have left, and can speak freely reinforce this understanding. "If a customer tried to grope or verbally attack us during a lap dance we were expected to defuse the situation ourselves".-quoted in Stripped, the Reality of Lap Dancing.

For these reasons I would hope that the committee will reinforce a commitment to a nil cap on sexual entertainment venues.

Chris Green OBE (Services for equality)

Best wishes

Chris Green

I am writing to express my support for the two sexual entertainment venues (SEV's) in Bristol. There is a licencing committee meeting, where councillors will discuss the future of SEV's.

I would like to give my support to the two venues currently in Bristol, Urban tiger and Central chambers. I have worked at the clubs for the past seven years and can honestly tell you that both clubs are run to an exceedingly high standard, all the women who work there are completely there out of their own choices to work in an industry which they truly love. There is nothing illegal or unlawful about nude dancing, it is a form of entertainment of which there is a very high demand for in the Bristol area, Both clubs are perfectly situated in the town centre near other bars, clubs and are a huge part of the night time economy and diversity of Bristol.

All the women who work at the clubs rely on these safe regulated environments in order to be able to do our jobs, at both clubs there are very strict safety rules and protocols, which all members of staff abide by. All the management and owners are very professional and make them the most well run strips clubs i have ever worked at.

The men and women customers treat the dancers with the utmost respect and enjoy visiting the clubs as they are a place to have a great night out, where the customers and dancers feel safe, looked after and there is very little to no trouble at the venues at all, the security staff are some of the best in bristol and any customers behaving inappropriately are removed from the venue immediately. I have never once felt disrespected whilst working there, i always feel like the customers, managers and owners treat me with more respect than I have ever felt in any other job role I have ever done. I have worked in other jobs where I have felt a lot more disrespected as a woman than I have ever felt working as a dancer.

There is no violence or trouble at the venues, most people come in there so they can have a brilliant night out in a safe and controlled environment.

The renewal of the licences means everything to myself and the other dancers, we believe that women should have the choice to work in the legal and regulated industry in which they choose, not be forced in to unemployment by the minority of people's beliefs who simply don't like strip clubs, who find any excuse under the sun in order to try and justify their negative beliefs about strip clubs. The majority of Bristol are very supportive of strip clubs and dont have any objections to us being there, which has been proved by surveys and research. Working at the clubs has enabled me to live an amazing and fulfilling life where i can fully support myself financially, get a mortgage by myself and has given me the time to put work in to my bespoke dressmaking business. I can honestly say that being a dancer

at the clubs is my dream job. I look forward to going to work and feel safe, respected and grateful that myself and other dancers have such a well run establishment to work at.

Without the licenced clubs, all the people who rely on the clubs for work would be threatened with unemployment, and lose their entire careers, the impact of this would be detrimental as dancers would be given no choice but to work in unsafe unregulated venues, which would put dancers in potentially dangerous situations.

There is countless evidence from the police that the clubs are safe and cause minimal to no trouble compared to other city centre bars and clubs. There is no evidence of violence related to the clubs or the way in which male or female customers view women inside or outside of the clubs, and there is no evidence that strip clubs cause wider inequality towards women. There are far worse problems in Bristol and the strip clubs are not one of them.

I fully support the renewal of both Urban tiger and Central chambers licences. Say no to nil cap. Let us work in a safe and regulated environment.

Phoenix



To Whom It May Concern

RE: SEX ESTABLISHMENT POLICY MEETING – 28 JULY 2022

BARBI represent over 450 night time economy venues across Greater Bristol and over 11,000 workers. We strongly oppose the introduction of a Nil Cap on SEV venues for the following reasons:

The SEV's in Bristol are regulated and safe.

Evidence shows that violence against women takes place in a major nightclub in Bristol close by, not at the SEV venues.

Putting up to 100 staff out of work, including dancers, security staff, bar staff and cleaners whilst still trying to recover from the COVID pandemic and after Bristol City Council have announced a cost of living crisis seems ludicrous.

Strippers should not be blamed for the violence of men. The emphasis needs to be on educating men rather than than laying blame on the workers.

The relentless campaign by Bristol Women's Voice and their associated organisations is from a moral standpoint. BARBI is extremely concerned that a council funded organisation seems to have so much power and influence in the city. Some of their funding is to promote diversity and inclusion, however they are not allowing access for those that wish to join to do so. Their exclusionary and radical views are causing a lot of anxiety across the industry – what will they look to close next? Certain types of music?

Should you require any further information please do not hesitate to contact me. I will be in attendance at the hearing on 28 July 2022 and wish to read my statement.

Best regards

Brendan Murphy
Director, BARBI

brendan@barbiebristol.com

BARBIE Group Ltd, c/o Raw Space, 111 Gloucester Road, Bristol, BS7 8AT

info@barbiebristol.com 0117 2140098

Company Number : 12622427

Dear Bristol City Council,

Can I please request to address the council meeting tomorrow.

I am an Associate Professor in Law at the University of Bristol and have been researching the regulation of women's labour, including sexual services, for the past 15 years. I specialise in labour law, public law and gender and law subjects. I have conducted extensive research in the UK and globally about the best way to protect people who exchange sexual services for benefit, cash or otherwise. As a result of this research, I am firmly of the view that, regardless what your moral position on this issue might be, the best way to protect those involved in this type of work or activity is not, through criminal or public law, to close their workplaces. It is at best a band aid on a much wider set of issues, many of which - including poverty - those who work in SEVs are intimately acquainted with.

For this group of workers, closing SEVS will restrict their ability to organise and demand their rights at work, which is an activity that is currently gathering steam across the UK and globally. Precarious gig workers are demanding their rights at work and strippers are part of this group of workers. The only reason, I believe, that they are singled out and treated differently is due to either a moral stance against sexual services, or a belief that strippers are victims of sexual exploitation. To this I would say that we regularly sell our labour in immoral conditions and patriarchy and sexual exploitation are not confined to the four walls of the strip club. This is not okay, nor should we view it as such, but closing SEV workplaces WILL NOT make these issues disappear. Rather, it will drive the striping workforce underground, into unemployment and other, likely worse paid jobs.

I urge you not to exercise your powers to close or cap the number of SEV clubs and instead continue to protect and promote the rights of workers in Bristol, as well as extend social welfare support, including housing, to those who need it. These are the strategies that will protect strippers. Closing their workplaces will only make their lives worse.

Yours sincerely,

Dr Katie Cruz

Dr Katie Cruz
Associate Professor in Law
Deputy Research Director | Co-Director of the Centre for Law at Work
University of Bristol
3.61 Wills Memorial Building
Bristol, UK

Dear Democratic Services

Please find below my statement for Thursday's committee. Can you please acknowledge receipt?

Many thanks,
Helen

Dear Colleagues

I am making this statement in a personal capacity, but also as the Cabinet Lead on Women, and the Women Safe City.

As you know, the issue before you has taken a long time to come to your Committee, and in that time, some hardline positions have been taken, but I hope that you have open minds in listening to the debate, and taking all views into consideration.

The consultation results, numerically, are only part of this background, but the content, the opinions and the evidence in those consultation responses is what is really important.

Let me be clear, I wholeheartedly support the nil cap. I support it as a Councillor, but I also support it as a woman, living in the city for many years now, and active in women's issues over that period.

To me it is incomprehensible that we are working towards a "Women Safe City", with safe environments for women including in the night-time economy, (where, incidentally, some excellent work has happened recently, acknowledged with additional funding from the Home Office) and with our Chief Constable Sarah Crew, and PCC Mark Shelford, (with some nationally leading work on tackling Violence Against Women and Girls) but at the same time be prepared to licence strip clubs, when all the evidence shows that their existence fosters objectification and misogyny, at the least, and sexual violence in society at the worst.

I hope that all Members have had a look at the excellent report from Bristol Women's Commission, [SEVReport2021FINAL.pdf \(bristolwomensvoice.org.uk\)](https://www.bristolwomensvoice.org.uk/SEVReport2021FINAL.pdf) and carefully read the research base for their conclusions.

In the lead-up to this meeting, with all the coverage it has received in the local media, I was particularly interested in one comment to a story on Bristol 24/7 from a man, who said that like many men, he had no interest in going to such a venue, but that he thought it was obvious that having the clubs there as an option for male entertainment at all, was bound to add to an environment of the objectification of women and girls, and as such, should not be part of the city's "offer".

Please listen to those voices, and do as Edinburgh has done most recently, and other Local Authorities are doing, and confirm Bristol as a place where we can all feel, and be, treated equally, and most importantly safely.

Thank you,
Helen

Cllr Helen Holland
Labour Councillor – Hartcliffe and Withywood

Cabinet Member for Adult Social Care and Integrated Care System
Women and women safe city

Bristol City Council

I have lived experience of the sex industry and now work with NGOs that support women from the industry, including from lap dancing.

I want to address the absurd idea that it is 'anti equalities' to shut strip clubs. Actually, it is the industry that is totally anti equalities.

Take its employment model. Only lap dancers (women) are deemed 'self-employed', whilst all other staff (mostly men) are employed with guaranteed income and employment rights.

This means strippers must:

- **PAY to work** each night (this can be £100 or more)
- They then **Work for Free**
- They only make a penny when a man buys them for a **private session** (probably £40 in Bristol clubs)
- But clubs always have **far too many lap dancers to punters** – making it hard to get these private 'dances'
- Strippers must then **pay a portion of their income back to the club**
- Many clubs also **fine lap dancers** on a whim (which, of course, all workers and clubs always deny)

So, in fact, it is hard to make good money, sometimes any money, or even break even. One research study found that **70% of lap dancers actually lose money.**

At the same time women in the industry will vigorously deny this and even show 'dissonance' –believe something which at the same time you know is not true.

That is how we cope in the sex trade. I should know, that is what I did. That is what all the women I support who have escaped the industry did.

I also know that women who struggle to make money lap dancing are extremely vulnerable to harassment outside the clubs and to offers from men who attend them to earn larger sums by meeting them or their associates in person, because these women are already involved in the sex trade.

I've never heard of a high-roller client at a strip club, who can bring celebrity associates in, being barred from the premises for procuring women this way, but women I know who succumbed to such offers must of course deny that it happened, or be sanctioned by a club that continues to deny that it even occurs.

"Equalities" they say?

They would, wouldn't they?

E

We support survivors of the sex industry, including lap dancing.

Based on this we are expert in the harmful *reality* of stripping – which is invariably vehemently denied whilst in it, as a necessary survival mechanism.

Being objectified and objectifying yourself is so harmful that psychologists view it as a form of *trauma*. This is true regardless of whether women chose it. But this is the entire premise of lap dancing.

Feigning desire and interest in men, some of whom might actually repulse you, night after night is equally harmful. Providing this kind of ‘girlfriend experience’ is one of the hardest parts of the job, our survivors tell us. But this too is absolutely integral to lap dancing.

On these grounds alone, whether or not any ‘rules are broken’ (and invariably they are), the industry is incompatible with women’s human rights, mental or physical well being or with equality.

The idea that closing strip clubs will ‘drive the industry underground’ is also nonsense – particularly when the owner of Bristol’s two strip clubs is already supplying naked women to ‘private parties’ in men’s homes!

It is the strip industry that feeds the underground industry, *not* closing it.

The fact that workers at the club feel unable to do anything other than stripping shows how vital it is that you provide practical and mental health support to these women right now – and most especially when you close these clubs.

GH

July 27, 2022

Statement about the price and damages caused to women strippers as a result of sanctions carried out against the activity of strip clubs in Israel

by Argaman Alliance

We are Israeli strippers who have worked in strip clubs over the past few years. We chose this work independently as part of our plans for the future. We have the experience and expertise to deal with most of the challenges our work presents us. However, in the last 4 years we have had to deal with an increasing flood of police raids, stigmatization of us in the media, and unprecedented interference by the authorities in our lives with the guidance of the state attorney determining what we are allowed and not allowed to do with our bodies. The process reached its peak in February 2020, when the police closed the clubs where we worked without prior notice and without being offered any alternative. We were left without a livelihood and some of us also without a social safety net.

The excuse for closing the clubs was to protect strippers, but the results were devastating for us. There are mothers among us and those who support their family members. Therefore, the loss of livelihood hurts not only us but also the children and elderly we support. The financial anxiety is difficult, but no less difficult is the feeling of being wiped out. Throughout this process our voice was not heard. We were excluded from the discussions held by the state authorities about us and our bodies, as well as from making decisions that severely hurt us and our families.

We are strong women with different life experiences, interests and skills. We managed, despite many obstacles, to achieve financial independence and achievements in our lives and we are proud of it. The new policy in Israel robs us of basic rights and freedoms, primarily freedom of occupation, freedom of expression and the right to our own bodies. The worldview embodied in this policy denies our very existence as human beings with discretion and the ability to act in the world and is like dehumanization.

The chronology of the sanctions against the strip clubs

- Following pressure from radical women's organizations, during 2017, police sanctions began against the clubs that had private rooms on the grounds that they were used for the purposes of prostitution services.

- The lobby who led the fight for closing the strip clubs put a lot of pressure on the authorities and enforcement agencies to provide evidence of acts committed in the clubs. For example, in a position paper from December 2017, the lobbyists called for "Increase covert and proactive investigative activities to gather evidence - both administrative and criminal." As a result, the clubs became the focus of repeated police investigations and raids as the effort to produce evidence focused on the strippers themselves. In undercover police operations, policemen arrived at the club as customers and ordered private dances with all that implies. Many women describe the police raids as a frightening and even traumatic event. Strippers who raised their voices against police officers were tied up and even taken to the station in handcuffs. Many women reported humiliating treatment and violations of basic rights.

Both in the police raids and in the investigations for giving testimony, the women were not given a detailed explanation of their rights and they had no one to consult with. Women who were invited to testify at the police without a warrant did not know that they were allowed to refuse and that they were not required to answer all the police's questions. Women were held all night at the station and during the night they underwent lengthy interrogations, under psychological pressure, in an attempt to get them to admit that they had given paid sex services in the club or to testify against their friends for having given sex services in the club. A number of women testified that the police put strippers in an identification order for customers, when the customers were asked to point to strippers who offered sex services. A number of women who were invited to testify in January and February 2020 were required to hand over their bank account details to the police. Since they did not receive an explanation of their rights, they agreed to the request.

- In the amendment to the directive of the enforcement policy for offenses related to prostitution dated April 2, 2019, the state attorney stated that lap dancing will be considered an act of prostitution. Following the publication of the lap-dance directive, strippers were ordered to refrain from lap-dance. In its place, they began to offer side-dancing, dancing next to the client, while the stripper was being careful not to sit on the client's lap. For the purpose of enforcement, increased use is made of video cameras that record the strippers during their work, when the police have free access to the documentation.

The lap dance ban had two significant consequences: First, there was a dramatic decrease in the income of the strippers. Secondly, the side dance requires

considerable physical effort and creates a lot of strain on the knees. As a result, strippers reported knee and back pain after each shift. The physical effort together with the care to avoid contact with the client significantly affected the enjoyment of the work.

- On February 10, 2020, the police issued closure orders to all strip clubs operating in Tel Aviv. Since the clubs were closed, most of the strippers have not been able to find an alternative job that suits their needs and most of them have suffered from a lack of livelihood even before the corona crisis. Some worked as waitresses, cleaning or taking care of children or the elderly, but the salary was not enough for rent and supporting family members. Others turned to work in sex cams on the Internet, striptease in private homes or sex work in discreet apartments. They report that unlike their work in strip clubs, these jobs force them to do things they don't want to and put them in danger, since in private homes they don't have the same security and protection mechanisms that exist in clubs.

Scarlett, who worked for 7 years as a stripper at the club, described the situation 8 months after the closure as follows: "Most of us have been working and supplementing income in the private sector for a long time or living off savings like me, I haven't worked since the closure. I'm not ready to enter into this consciousness of slavery that exists here, maximum work minimum pay. I feel at the disadvantage of work. I'm one of those who work all the time. And I miss it with an intensity that I can't even describe to you. The injustice they did was not really perceived. The club was the safest, most supportive, happiest environment there is!! I was happy I made a living without being accountable to anyone. They expect me to go to NGOs like a person in need. No thanks, it's not for me."

To sameise: The women's radical organizations pushed the authorities to close the strip clubs - from today to tomorrow, and forced 100 women, from today to tomorrow, to drop - suddenly and without any preparation, from a financial income of thousands/tens of thousands of shekels per month, to zero financial income.

The women's radical organizations forced them from one day to the next - to become aid recipients. Decide for them that the humiliation of dancing in the lap of a smelly man is not in their best interest, but the humiliation of being supported by welfare and relief and receiving a psychiatric allowance is in their best interest.

The women's radical organizations came and played in the lives of 100 strippers. They robbed them of control over their lives for their "good".

Below are quotes from several women telling in their own words how the sanctions against the strip clubs affected them. (All were written in July 2022)

Almost 30 years old. Married (Was single by Feb2020). A medical degree student: "about a year before the infamous law passed, it seemed like the activist organizations had locked in on strip clubs, it was an easy target. We started getting protesters outside our doors, and after we asked them to leave us to our work, they would exclaim that our opinion doesn't matter and they're there to liberate us from our chains. The first thing that happened is that they closed the VIP rooms. it was a serious hit on our income. Some girls weren't ready to take that hint, so they would take the clients to the bathroom, the manager's office, or sometimes in hotel rooms or their own homes to compensate for the loss. then, the raids started...the first time, the officers walked around all smug and heroic, thinking that they managed to liberate us, they finally caught the horrible abusers and women enslavers, and now we'll go free, become the engineers and doctors we were meant to be, only to come back after a week or a month to discover the same girls working the same club claiming, they never wanted to be liberated, it's their choice to work in that club. That's when the officers became more violent and aggressive. If we weren't going to change our minds with their acts of heroism, they'll coerce us into leaving with violence. if our work failed to provide us with the suffering they believed to come with the territory, they were going to supply it. Slowly and steadily working became increasingly more challenging as more and more restrictions were put on the job, making it harder. Lap dances became illegal, and with it all forms of contact between the worker and the client, it meant that now we had to spend our time hovering over the men, or dancing standing up, spending long shifts on our legs, tiring our backs and knees instead of resting calmly on a guy's lap. Many girls decided it wasn't worth the pain, many turned to prostitution, working in parlors. Some used the club to find clients for private escorting after the working hours. I decided to start working as a dominatrix, having to find my own clients, sorting through them, renting out a place, inviting strange men over with no security. working in the club gave me a center, it pushed me to be better and keep a healthy routine. without it, my life started to slowly crumble. when that line of work stopped being an option, I had to get accustomed to a much lower standard of life, leading to depression and almost lead me to commit suicide. As a part time dominatrix I took risks since I had to work out of my own apartment with strange men that I don't know. I earn less. I was a student, but since I dropped out of school unable to pay my tuition or rent. I miss my job. it was fun and profitable, it let me evolve as a person and live a better life. In my past I was a PR secretary (hated it), worked some minimum wage stuff... "

35 years old. Single. Has an Academic Degree: "When the law banning lap dance started, I felt that it really interfered with my work. that they interfere with and control my freedom of movement and expression and that I have to put in much more effort and work in a way that is much less comfortable and organic for me. I had no choice but to adapt to the new way of working, and despite the loss of comfort and the drop in income, I was happy to continue working in an environment that I love and am used to. I worked during the day usually from 17:00 to 22:00 or 23:00 and if I wanted a night shift then I also worked at night. Then they closed the clubs in one fell swoop. This is one of the most difficult events in my life. My stability was dropped from under my feet in an instant. Both the financial aspect and the emotional aspect for me were undermined because the workplace was a warm home and a social framework, belonging and community for me. Since the closure I have been working in online cams and striptease in the private sector. Today I earn less. After the closing I received no assistance in finding a new job or vocational training. I really want to go back to work at the club and if it was possible, I would go back right now. The closing of the clubs was a bad turning point in my life, uncertainty and instability. I don't want to change course. I don't want ideas and occupations that I don't want to be imposed on me. I miss working at the club and wish to go back to work for them. I have worked in a variety of jobs throughout my life. I am an academic with two degrees and I have worked both in my field of study and in educational and teaching institutions, as well as working as an instructor and assistant in the framework of work in special education. The work in stripping did not contradict my other actions, but on the contrary, it complemented and contributed to my development on many levels and allowed me to both learn and realize my dreams and my creation. I was engaged in stripping at the same time as my projects in the field of art and thus I experienced financial independence and self-fulfillment. I was able to improve my lifestyle thanks to this occupation more than any other occupation that I have engaged in in my life. Thanks to the work in striptease, I was able to support my family during a crisis due to the medical condition of my late mother and during her illness I was able and privileged to be by her side, take care of her and feed her. Something I could only do thanks to the financial freedom I had".

27 years old. Single. Has an Associate Degree: "I was very sad after the closing. When I worked I earned amazingly. My life was very good. All thanks to the discipline, I didn't have to do other things for the money, I earned it by working shifts at the club, I had financial freedom. I enjoyed every moment, I worked 25 days out of 30 a month by choice. Sometimes even a full month. After the clubs closed, I lived with my parents. I had nothing. I took it very hard. Like your stocks fell. Today I earn less. After the closing I received no assistance in finding a new job or vocational training. I would like to go back to working as a

stripper. I had a good time. I had fun. I earned well. I loved what I did very much. In the past I worked in regular jobs. Mainly waitresses, clothing stores, gas stations, an agent of luxury cars, but the pay was never as rewarding as the work in stripping!"

29 years old. Has an Associate Degree: "The closing of the clubs affects me both mentally and financially very much! Today I earn less. After the closure I received no assistance in finding a new job or professional training even though I contacted aid organizations. I would very much like to return to work in stripping both to fulfill myself financially and to return to the work I loved so much. In the past I've worked almost every possible casual job, including an alternative detention instructor."

35 years old. Single. Has an Academic Degree: "When the clubs were closed, I became depressed. Since then, I have been working in WEBCAM. Today I earn less. After the closing I received no assistance in finding a new job or vocational training. I miss work very much. When I was a stripper, I felt vital. I flew for life. In the past I worked as a waitress, a medic, a multidisciplinary holistic therapist."

33 years old. Single. Academician: "The closing of the clubs caused me a lot of financial anxiety and uncertainty to this day. Since then, I improvise all kinds of jobs. Today I earn less compared to what I earned as a stripper in clubs. After the closing I received absolutely no assistance in finding a new job or professional training. I would like to go back to work in clubs. I really liked the job. Gave me a lot of peace, fun, and interest. I miss it"