

**ANGUS COUNCIL**

**CIVIC LICENSING COMMITTEE – 9 JANUARY 2020**

**LICENSING OF SEXUAL ENTERTAINMENT VENUES**

**REPORT BY THE DIRECTOR OF LEGAL AND DEMOCRATIC SERVICES**

**ABSTRACT**

The purpose of this report is for the Civic Licensing Committee to consider recommending to Angus Council that it pass a resolution in respect of the licensing of sexual entertainment venues in the Angus area in terms of Section 45a of the Civic Government (Scotland) Act 1982.

**1. RECOMMENDATION**

It is recommended that the Committee:-

- (i) note and consider the responses received in relation to the consultation exercise which was carried out between 6 November 2019 and 16 December 2019;
- (ii) in light of those responses, determine whether the Committee is minded to recommend to Angus Council that it pass a resolution to require sexual entertainment venues to be licensed;
- (iii) if the Committee is minded to recommend to Angus Council that it pass a resolution to require sexual entertainment venues to be licensed, instruct the Director of Legal and Democratic Services to prepare a report to Angus Council recommending that the resolution as contained at **Appendix 1** be passed and that it come into effect one year after the resolution is made;
- v) in the event that a resolution is passed by the Council, instruct the Director of Legal and Democratic Services to:-
  - a) consult with groups who may have an interest in this matter including, but not limited to, Police Scotland, Violence against Women Partnerships, Angus Women's Aid, Angus Community Planning Partnership as well as the public in relation to the formation of a Licensing Policy Statement
  - b) report back to this Committee providing a proposed note of application process for approval by the Committee, including application forms, guidance and a draft Sexual Entertainment policy statement.

**2. REPORT**

- 2.1 At its meeting on 31 October 2019, this Committee agreed to instruct a public consultation in respect of the proposed licensing of sexual entertainment venues following a change to the Civic Government (Scotland) Act 1982 which introduced the option for local authorities to licence such premises.
- 2.2 The consultation was advertised online on the Angus Council Have Your Say section of its website as well as on the Council's social media including Facebook and Twitter. Additionally, various parties were written to so that they were alerted to the consultation and these parties included Police Scotland, Violence against Women Partnerships, Angus Woman's Aid, Angus Community Planning Partnership, Community Councils, the Angus Child and Adult Protection Committees, Elected Members and the NHS.
- 2.3 There were a total of 7 responses received in relation to the consultation and these responses are included at **Appendix 2**.
- 2.4 The Committee require to consider these responses and determine whether sexual entertainment venues ought to be licensed within Angus. If the Committee is minded to recommend to Angus Council that it pass a Resolution introducing licencing for sexual

entertainment venues then a report is required to be submitted for consideration to the full Council who will determine whether to pass the Resolution. The Resolution requires to be published in a local newspaper at least 28 days before the Resolution comes into effect which can be no earlier than one year after the Resolution is made.

- 2.5 If the Resolution is passed, the Act requires the Committee to agree to a Sexual Entertainment Venue Policy Statement and it requires this to be created in consultation with interested groups.
- 2.6 If the Committee is minded to recommend to the Council that the Resolution be passed and Council subsequently pass this, it is suggested that a further report be submitted to this Committee recommending a process for applications, including details about the application forms and fees. Furthermore, this report will provide, for the Committee's approval, a draft Licensing Statement which is required in terms of the Act. The draft Licensing Statement will be prepared in consultation with interested groups as set out in the Recommendations.

### **3. FINANCIAL IMPLICATIONS**

There will be a resource implication in terms of staff time in relation to establishing a new licensing regime. This time is being met from existing budgets.

If a Resolution is passed then an exercise will need to be undertaken in respect of determining fees associated with the SEV application process.

### **4. HUMAN RIGHTS IMPLICATIONS**

The matters within the report potentially engage the right in respect of freedom of expression (Article 10) which the Committee ought to be mindful of.

At present, there are no SEVs in Angus at and the Council is not aware of any proposal for an SEV, so the adoption of a Resolution will not prejudice any existing businesses or workers.

### **5. EQUALITIES**

The Committee ought to have regard to their obligations in terms of the Equality Duty under the Equality Act 2010.

If a Resolution is passed then a full equalities impact assessment will require to be carried out as part of the development of the SEV Policy Statement through consultation and evidence gathering. This assessment will be presented with any future report for information.

**NOTE:** No background papers as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to any material extent in preparing this report.

**REPORT AUTHOR:** Nannette Page, Team Leader

**EMAIL DETAILS:** [LEGDEM@angus.gov.uk](mailto:LEGDEM@angus.gov.uk)

**DRAFT RESOLUTION**

That Angus Council has, having consulted with the public, resolved in accordance with section 45(1) of the Civic Government (Scotland) Act 1982, to adopt a resolution that, with effect from one year after making of this resolution, the following activity, *viz*:-

- a. The use of any premises at which sexual entertainment is provided before a live audience for (or with a view to) the financial gain of the organiser

shall require to be licensed by Angus Council in accordance with the provisions of Schedule 2 of the Act and shall be regulated by those provisions.

**CONSULTATION RESPONSES****1. ANGUS VIOLENCE AGAINST WOMEN PARTNERSHIP**

Angus Violence Against Women Partnership (AVAWP) is the multi-agency strategic forum for progressing the national Equally Safe strategy at a local level.

Equally Safe is the joint strategy of the Scottish Government and COSLA for preventing and eradicating violence against women. The vision of Equally Safe is “*A strong and flourishing Scotland where all individuals are equally safe and respected and where women and girls live free from all forms of violence and abuse – and the attitudes that help perpetuate it*”.

All Violence Against Women Partnerships are expected to use Equally Safe as a reference point in conducting their work and have a strategy in place to demonstrate how this will be delivered locally. Equally Safe includes in its definition of Violence Against Women and Girls ‘commercial sexual exploitation, including prostitution, lap dancing, stripping, pornography and trafficking;’

AVAWP therefore believes that all forms of commercial sexual exploitation, including prostitution, trafficking, pornography, lap dancing, pole dancing, strip clubs etc, are inherently harmful and exploitative of women and we reject the notion that lap dancing and pole dancing are legitimate forms of entertainment.

**1. Should Angus Council require Sexual Entertainment Venues (SEVs) to be licensed?**

AVAWP believes that such SEV are in direct contradiction of our policy on commercial sexual exploitation, the Scottish Government’s Equally Safe Strategy and the UN Declaration on the Elimination of Violence Against Women, particularly articles 1 – 3. AVAWP recognises the harm done to women and girls by sexual violence, abuse and exploitation. By setting the number of licenses they will grant at **zero (0)** the licensing committee would make significant steps forward to ensure that their approach to gender based violence is in line with national and local strategy and policy. Furthermore, it reinforces and demonstrates the aspirations for Angus as a whole by demonstrating a commitment towards equalities and makes evident that they take seriously their obligations under the public sector equality duty.

**2. If the council decide to require SEVs to be licensed, what matters should be taken into consideration in developing a Sexual Entertainment Venue Policy Statement?**

AVAWP believe that there is a need to consider Human Rights within the licensing regime and that the focus should be on the rights of women contracted in clubs and women as part of the broader general public. The focus should not be on

Article 1, Protocol 1 of the European Convention of Human Rights for the owners and operators of SEVs. This emphasis has discouraged many local authorities in England and Wales from setting nil values when in reality the risk of legal challenges may be relatively low.

As well as considering Article 1 we believe the guidance should also consider the impact of SEVs on women's rights, in particular

- Article 2 (right to life);
- Article 3 (right to be free of inhuman and degrading treatment);
- Article 4 (right to be free from slavery and servitude);
- Article 14 (right to protection from discrimination).

The legally binding Public Sector Equalities Duties (PSED) requires local authorities to seek to promote equality, promote 'good relations' between women and men and The PSED states that a public authority must, in the exercise of its functions, have due regard to the need to -

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

The PSED must legally be abided by when creating and maintaining SEV Licensing Policy and in the granting or renewing of licenses for SEVs.

Any framework developed around SEV's should also consider the following:

In terms of the location of SEV's we believe local authorities needs to look at issues of their localities and consider a range of issues such as:

- the location of schools
- the location of places of worship
- the location of heavily residential areas
- whether there have been incidents involving anti-social behaviour, sexual assaults or more minor harassment reported in any particular area
- whether there have been incidents of human trafficking or exploitation locally.

If Angus Council decides to license SEVs then it must claim a certain level of responsibility for women's safety in these establishments and include license conditions that will help mitigate the harm caused by this form of exploitation. We believe here should be a set of **mandatory** conditions held within the local authority policy statement on SEVs. The focus must be on the requirements of the SEV operator and not a set of expectations on individual performers to regulate their own working environment nor manage paying customers inappropriate behaviour.

Conditions should be focused on protecting the women contracted as lap dancers and should include:

- *rules to be displayed at appropriate locations within the venue of customer conduct that is deemed acceptable e.g. customers to remain fully clothed at all times*

- *list of full names, dates of birth, nationality and contact details (address or telephone number) for all performers to be available on the premises for immediate production if requested by Police or local authority officers.*
- *ensure immigration status is in order and performers have not been the victims of human trafficking*
- *employment of security guards*
- *use and storage of CCTV*
- *provision of hygienic changing facilities and a toilet with access to hot water exclusively for the use of the performers*
- *set break times for performers*
- *the provision of a break room exclusively for the use of the performers*
- *performers to be escorted by security to nominated taxi or to their car at end of shift*
- *No full nudity – performers must be partially clothed in performance area and performers to remain clothed outwith performance area*
- *no physical contact between performers and customers with a distance of 1 metre*
- *no private secluded booths or areas*
- *customers are to be fully clothed at all times*
- *license holder to ensure customers do not offer payment in return for sexual favours*
- *license holder to ensure customers do not offer any form of contact details to performers*
- *license holder to ensure no one engages in any unlawful activity within SEV*
- *no photographs or video recordings to be taken.*

## 2. WOMEN'S RAPE AND SEXUAL ABUSE CENTRE, DUNDEE AND ANGUS



### **Angus Council Consultation on the Licensing of Sexual Entertainment Venues (SEVs)**

#### **About The Women's Rape and Sexual Abuse Centre (WRASAC)**

The Women's Rape and Sexual Abuse Centre (WRASAC) was established in 1984 and supports women, children and young people who have experienced rape, sexual abuse and exploitation at any point in their life across Dundee and Angus. We work with survivors in a way that is trauma informed, and recognises a gendered definition of sexual violence, abuse and exploitation. This is based on the United Nations Declaration on the Elimination of Violence Against Women which states that:

*'Gender based violence is a function of gender inequality, and an abuse of male power and privilege. It takes the form of actions that result in physical, sexual and psychological harm or suffering to women and children, or affront to their human dignity, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life.'*

*By referring to violence as 'gender based' this definition highlights the need to understand violence within the context of women's and girl's subordinate status in society. Such violence cannot be understood, therefore, in isolation from the norms, social structure and gender roles within the community, which greatly influence women's vulnerability to violence.'*

Through our Vice Versa project WRASAC works specifically with women involved in prostitution and those who have been exploited through this work we are clearly see the links between child abuse, childhood neglect and domestic violence to women's involvement in prostitution.

These factors, along with poverty, lack of stable but flexible employment to accommodate caring responsibilities, zero hours contracts, addictions, homelessness, trauma and mental health issues create vulnerability and inequality, which is exploited through men's payment for sexual activity.

WRASAC believes that all forms of commercial sexual exploitation, including prostitution, trafficking, pornography, lap dancing, pole dancing, strip clubs etc, are inherently harmful and exploitative of women and we reject the notion that lap dancing and pole dancing are legitimate forms of entertainment.

### 3. Should Angus Council require Sexual Entertainment Venues (SEVs) to be licensed?

The Women's Rape and Sexual Abuse Center believes that it is appropriate to license sexual entertainment venues and we would request that venues operating specifically for sexual entertainment in Angus be set at 0.

The Scottish Government's current strategy on ending Violence Against Women and Girls notes that Commercial Sexual Exploitation causes harm to all women, by sanctioning objectification of women's bodies, and further notes that this harm to women collectively happens regardless of whether individuals claim liberation or empowerment from the activity. SEVs are not conducive to a society which values and respects women and rejects the commodification of women's bodies. They are also places which offer poor employment conditions to the women working within, and which seek to exploit men as customers, as well as women as the 'product'.

WRASAC believes that such SEV are in direct contradiction of the Angus Violence Against Women's Partnerships (of which Angus Council are a member) policy on commercial sexual exploitation, the Scottish Government's Equally Safe Strategy and the UN Declaration on the Elimination of Violence Against Women, particularly articles 1 – 3.

4. What impact do you consider a SEV might have (such as on you or on the area you live)?

Our main objection to the granting of licenses to sexual entertainment venues is the impact on the lives and safety of women and girls across Angus.

Campaigning organisation, Object, have clearly defined the harm to women and girls that is exacerbated by the presence sexual entertainment venues in towns across the UK.

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

The provision of visual entertainment for the purpose of sexual stimulation serves only to increase the sexual objectification of women and girls and to normalise the sexualisation of girls from a very early age. The normalisation and acceptance of this process of sexualising girls is seen as major online retailers are selling pole dancing kits with paper money in their 'toys and games' section thus encouraging attitudes about pole dancing that view it as 'fun' or 'chic' or even as 'healthy exercise'.

[https://www.amazon.co.uk/Re-creation-Group-Plc-PEEKPD/dp/B000EW3PJ2/ref=sr\\_1\\_2?keywords=pole+dancing&qid=1566310426&s=kids&sr=1-2](https://www.amazon.co.uk/Re-creation-Group-Plc-PEEKPD/dp/B000EW3PJ2/ref=sr_1_2?keywords=pole+dancing&qid=1566310426&s=kids&sr=1-2)

Research studies carried out by a number of institutions since 2000 have shown the harm to women and girls caused by the presence of strip clubs, lap dancing clubs and other sexual



entertainment venues in their locality. Kelly et al (2007) found that the presence of sexual entertainment venues in localities increase the demand for prostitution services<sup>1</sup>

A 2003 study carried out by Eaves Housing for Women in the London Borough of Camden found that there was a 50% increase in sexual assaults in the borough after the rapid expansion of lap dancing clubs.<sup>2</sup>

Research commissioned by Glasgow City Council in 2004 from the Child and Women Abuse Studies Unit at London Metropolitan University<sup>3</sup> found that it was common for clubs to ignore the regulations, particularly the 'no touch' rules. Researcher Julie Bindel identified the increase in the number of clubs as "the fastest growing area in Britain's sex industry".

The study states that "*approximately half of customers in Glasgow went to clubs looking for sex. 25% claimed they had sex with a dancer on the premises.*" It continued, "*It can be concluded from the body of evidence that some lap dancing club owners and managers create conditions in which prostitution is likely to occur.*"

Bindel's research defines the variety of 'dances' that are offered in clubs and performed in the public areas and in enclosed booths.

**Pole dancing:** a 'cabaret' performance in the main club area and is most commonly what the public who are unfamiliar with these establishments presume is sole practice within the club.

**Table dancing:** performed near the customer's seat with dancer's breasts eye level to the customer

**Couch dancing:** dancer stands over the customer who sits on a couch, with her breasts hanging over him

*"the US version of lap dancing requires the dancer to straddle the man's lap and grind or brush against him. A variation includes the woman dancing between the customer's legs while sliding down the chair so her thighs are rubbing the customer's genitals as she moves. This is also known as 'friction dancing'."*

The practices, above, mean that women are not protected by the 'no touch' rules that are supposed to be adhered to by customers in clubs. The closed booths where private dances take place are supposed to protect customer confidentiality but serve only to expose women to physical and sexual assault and create an environment where prostitution can happen. The practice of women paying to work in the clubs and the number of dancers to customer often leave women with little choice but to offer sexual services so that they do not end the evening/week in debt.

Lap dancing, table dancing and pole dancing are variations of the same routine and tend to occur in the same venue as do stripping and erotic dancing. Women working in clubs are regularly physically, verbally and sexually assaulted and stalked and are also regularly

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<sup>1</sup> Coy, M, Horvath, M & Kelly, L (2007) *It's just like going to the supermarket: Men talk about buying sex in East London* London: Child and Woman Abuse Studies Unit

<sup>2</sup> Eden, I. (2003) *Lilith Report on Lap Dancing and Striptease in the Borough of Camden*, London: The Lilith Project, Eaves Housing for Women

<sup>3</sup> Bindel J (2004) "Profitable Exploits: Lapdancing in the UK" CWASU, London Metropolitan University

propositioned for sex. Women involved in lap dancing clubs often use drugs and alcohol as a way of dealing with the impact of their work.

The Women's Support Project in Glasgow has produced a number of resources on the subject of commercial sexual exploitation. In their paper *Adult Entertainment or Exploitation* a 1998 study is quoted. *"Holsopple conducted interviews with women who worked as strippers. All of the dancers interviewed had suffered verbal harassment as well as physical and sexual abuse while at work. All had been propositioned for prostitution and three quarters had been stalked by men from the clubs they worked in."*<sup>4</sup>

We have concerns that the existence of SEVs creates areas where women may not be comfortable to go – creating divisions and exclusion.

The Royal Town planning Institute found that *"In relation to the 24-hour economy policy, ensure that the views of women are considered. Evidence shows that in certain locations, lap-dancing and exotic dancing clubs make women feel threatened or uncomfortable"* and'. . . *"women describe feeling frightened, disempowered, violated, embarrassed, unsafe (particularly if men are around) and avoid certain streets at night where they know there is a lap dancing club."*<sup>5</sup>

This feeling of intimidation and avoidance measures women take, goes far beyond when the club is operating at night. As highlighted in the journal *Criminal Justice Matters*:- *"Women also reported avoiding certain streets and feeling frightened in the day time, when the clubs are closed. It is the existence of the clubs that causes women to feel alienated in public space at all times, and fearful of the threat of violence posed by the sexual objectification of women."*

The Institute goes on to explain If women feel threatened and uncomfortable by the presence of a strip club then their very presence amounts to a form of discrimination, as it prevents full access and freedom of movement by women in a city or area , *"If a woman, whether objectively justified or not, fears to use part of the town centre characterised by sex establishments, this may be argued to amount to discrimination, in that her access to the public infrastructure of the town is impaired in comparison to that of men. Where relevant these considerations ought properly to be taken into account by authorities at the decision-making stage, and possibly at the policy-making stage"*<sup>6</sup>

Violence against women is a continuous spectrum of violence that is damaging to women's physical, mental and reproductive health. The abuse, violence and objectification experienced by women working in these venues directly breaches women's human rights, in particular the 'right not to be tortured or treated in an inhuman and degrading way' and the 'right to respect for private and family life (including the right to physical and psychological integrity)'

As a violence against women organisation and direct service provider WRASAC recognises the harm done to women and girls by sexual violence, abuse and exploitation. By setting

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<sup>4</sup> Holsopple K (1998) *Stripclubs According to Strippers: Exposing Workplace Sexual Violence. From the women's support project publication 'Adult Entertainment or Exploitation'*.

<sup>5</sup> (Royal Town Planning Institute 'Gender and Spatial Planning Good Practice' Note, 2010, p. 87)

<sup>6</sup> (Jackie Patiniotis & Kay Standing (2012) *License to cause harm? Sex entertainment venues and women's sense of safety in inner city centres. Criminal Justice Matters 88:1, 10-12.*)

the number of licenses they will grant at zero (0) the licensing committee will make significant steps forward to ensure that their approach to gender based violence is in line with council strategy and policy. Furthermore, it reinforces and demonstrates the aspirations for the city as a whole by demonstrating a commitment towards equalities and makes evident that they take seriously their obligations under the public sector equality duty.

5. If the council decide to require SEVs to be licensed, what matters should be taken into consideration in developing a Sexual Entertainment Venue Policy Statement?

We believe that there is a need to consider Human Rights within the licensing regime and that the focus should be on the rights of women contracted in clubs and women as part of the broader general public. The focus should not be on Article 1, Protocol 1 of the European Convention of Human Rights for the owners and operators of SEVs, this emphasis has discouraged many local authorities in England and Wales from setting nil values when in reality the risk of legal challenges may be relatively low.

Kolvin, in a review of decisions by local authorities in England and Wales states *“Where a rational decision has been taken by the licensing authority in accordance with the principle of the statute, it is most unlikely that the decision will be held to have been a disproportionate interference with human rights.”*

Guidance by human rights law expert Dr James Harrison, Director of the Centre for Human Rights in Practice at the University of Warwick, confirms that refusal to renew is not a breach of human rights law for individual’s applying for a license.<sup>7</sup>

We would hope that the full wording of Article 1 is included- *‘Every natural or legal person is entitled to the peaceful enjoyment of his possessions. **No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.***’ (Article 1, Protocol 1, European Convention of Human Rights)

As well as considering Article 1 we believe the guidance should also consider the impact of SEVs on women’s rights, in particular

- Article 2 (right to life);
- Article 3 (right to be free of inhuman and degrading treatment);
- Article 4 (right to be free from slavery and servitude);
- Article 14 (right to protection from discrimination).

The legally binding Public Sector Equalities Duties (PSED) requires local authorities to seek to promote equality, promote ‘good relations’ between women and men and The PSED states that a public authority must, in the exercise of its functions, have due regard to the need to -

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

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<sup>7</sup> <https://coventrywomensvoices.wordpress.com/2011/09/23/sex-entertainment-venues-and-the-human-rights-act/>

The PSED must legally be abided by when creating and maintaining SEV Licensing Policy and in the granting or renewing of licenses for SEVs.

Any framework developed around SEV's should also consider the following:

#### 1. Locations

In terms of the location of SEV's we believe local authorities needs to look at issues of their localities and consider a range of issues such as:

- the location of schools
- the location of places of worship
- the location of heavily residential areas
- whether there have been incidents involving anti-social behaviour, sexual assaults or more minor harassment reported in any particular area
- whether there have been incidents of human trafficking or exploitation locally.

In addition we would suggest inclusions of

- women's refuges and shelters,
- support services and agencies dealing with any equality issue or protected characteristic
- supported accommodation or services for vulnerable young people or adults,
- support services and agencies dealing with any social or health issue eg housing, mental health, addictions, housing / homelessness
- any youth projects or community projects.
- prevalence of other forms of commercial sexual exploitation, including prostitution
- instance of reported crimes involving violence against women and girls

#### 2. Conditions

If Angus Council decides to license SEVs then it must claim a certain level of responsibility for women's safety in these establishments and include license conditions that will help mitigate the harm caused by this form of exploitation. We believe here should be a set of **mandatory** conditions held within the local authority policy statement on SEVs. The focus must be on the requirements of the SEV operator and not a set of expectations on individual performers to regulate their own working environment nor manage paying customers inappropriate behaviour.

Conditions should be focused on protecting the women contracted as lap dancers and should include:

- *rules to be displayed at appropriate locations within the venue of customer conduct that is deemed acceptable e.g. customers to remain fully clothed at all times*
- *list of full names, dates of birth, nationality and contact details (address or telephone number) for all performers to be available on the premises for immediate production if requested by Police or local authority officers.*

- *ensure immigration status is in order and performers have not been the victims of human trafficking*
- *employment of security guards*
- *use and storage of CCTV*
- *provision of hygienic changing facilities and a toilet with access to hot water exclusively for the use of the performers*
- *set break times for performers*
- *the provision of a break room exclusively for the use of the performers*
- *performers to be escorted by security to nominated taxi or to their car at end of shift*
- *No full nudity – performers must be partially clothed in performance area and performers to remain clothed outwith performance area*
- *no physical contact between performers and customers with a distance of 1 metre*
- *no private secluded booths or areas*
- *customers are to be fully clothed at all times*
- *license holder to ensure customers do not offer payment in return for sexual favours*
- *license holder to ensure customers do not offer any form of contact details to performers'*
- *'license holder to ensure no one engages in any unlawful activity within SEV'.*
- *no photographs or video recordings to be taken.*

### 3. Enforcement

It should be made clear that a license has mandatory operating conditions. The responsibility for ensuring that conditions are met lies with the SEV operators (license holders), rather than with the performers. It is the license holder's responsibility to ensure that their customers abide by the law and treat performers with respect. It is **not** the performers' responsibility to ensure the license holder or customer are abiding by these conditions.

Whoever is expected to carry out checks or enforce any licensing conditions attached to a SEV license must be trained in all equality issues and training on violence against women, gender equality and commercial sexual exploitation.

Consideration also needs to be given as to how performers can be included in these site visits / checks to ensure they are able to communicate any concerns they may have with license owners or customers breaching licensing conditions.

### 3.COUNCILLOR STURROCK

**From:** [ColemanD](#)  
**To:** [PageN](#); [KimmittL](#)  
**Subject:** FW: Consultation Information  
**Date:** 05 November 2019 13:27:19

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Dear Both,

I noted this in Law Licensing.

Best Regards,

Daniel

**Daniel J. Coleman** | Licensing Standards Officer | Legal and Democratic Services | Place  
Directorate | Angus Council | Angus House | Orchardbank Business Park, Forfar DD8 1AN | Tel:  
01307 49 1763 | email: [ColemanD@angus.gov.uk](mailto:ColemanD@angus.gov.uk)

*NB: Please note that I am unable to issue legal advice and what I say is for guidance purposes only. If you require legal advice you are advised to consult a solicitor.*

**The Licensing Department opening hours are:-**

MONDAY 0900 - 1700  
TUESDAY 0900 – 1200  
WEDNESDAY CLOSED  
THURSDAY CLOSED  
FRIDAY 0900 – 1700

*Although we are closed to public visits and incoming calls during the times specified above, we are still available by email.*

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**From:** CllrSturrock  
**Sent:** 05 November 2019 13:15  
**To:** LAWlicensing  
**Subject:** RE: Consultation Information

Why introduce a law for a situation the does not exist in Angus.

Cllr Ron Sturrock

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**From:** **KimmittL On Behalf Of** LAWlicensing  
**Sent:** 05 November 2019 13:10  
**To:** CllrBell; CllrBraes; CllrCheape; CllrDavy; CllrDevine; CllrDuff; CllrHands; CllrLawrie;  
CllrMacMillanDouglas; CllrMcDonald; CllrMcLaren; CllrMyles; CllrProctor; CllrSalmond; CllrSpeed;  
CllrStewart; CllrSturrock; CllrWann

Cc: PageN

**Subject:** Consultation Information

Dear Councillors,

Please find attached a letter relating to a consultation being undertaken in relation to Sexual Entertainment Venues which may be of interest. This is a public consultation so please feel free to pass the information on to people or organisations that you are aware of which may have an interest in this.

Kind regards,  
Lynsey

Lynsey Kimmitt | Solicitor | Legal and Democratic Services | Place Directorate | Angus Council | Angus House | Orchardbank Business Park, Forfar DD8 1AN | email: [KimmittL@angus.gov.uk](mailto:KimmittL@angus.gov.uk) [LEGDEM@angus.gov.uk](mailto:LEGDEM@angus.gov.uk) | Tel: 01307 49 1887

#### 4.ANONYMOUS

As someone with generally left of centre libertarian views, I wholly oppose the suggestion of a licensing scheme for SEVs, which will in practice become a prohibition scheme by default, particularly in light of the intentions of the Scottish Government "Equally Safe" scheme, which has a stated outcome of outlawing pornography, stripping, lap dancing and deliberately conflates these with human trafficking, defining these as "commercial sexual exploitation" and wilfully and deliberately ignores, removes agency from and dehumanises those who willingly undertake these career paths and some of whom enjoy the work, referring instead to these people as exploited victims, removing their autonomy as adults to give their consent to undertake this work.

This may be a long submission but I hope to highlight my concerns over what I feel are illiberal and potentially authoritarian undertones that have driven the demand for local authorities to have these consultations, a decision perhaps taken to test the waters for a full blown ban on SEVs and a future ban on material deemed to be "sexually exploitative" or "Pornographic" by the Scottish Government.

The Scottish Govt claims SEVs and pornography cause serious harm to women, girls and society in general and this justifies outlawing stripping, lap dancing, SEVs and pornography, despite evidence for their claims being lacking and often based on cherry picked reports, written from a single prohibitionist standpoint, despite a mounting level of evidence against the "Nordic Model", they also aim to emulate Iceland, holding up the Icelandic ban on SEVs as a desirable model for Scotland to follow, despite **no** other western nation (Including Sweden and Norway) following its example despite the Icelandic ban being in operation for many years and raising serious civil liberties and self determination issues.

Iceland also has a wholly different culture and history to Scotland and I feel it is wrong to import a restrictive policy in what comes across as an attempt to socially engineer the country by curtailing personal freedom and criminalising potentially vast sections of the adult populace. I also oppose this as these consultations appear to be an attempt to shift any backlash from the Scottish government to local authorities and to test the waters for a full blown national ban.

At the same time as wishing to criminalise SEV and pornography, the Scottish Government is intent on decriminalising the possession of narcotics, drugs which are all classified and controlled due to being proven to cause serious harm to their users and attendant damage to society, I think nearly everyone in Angus is very much aware of the scars that Heroin has left on our communities and would be appalled that it would be without criminal sanction to be in possession of a class A drug that has been proven to cause serious harm to the user and the community at large but someone in possession of something deemed to be "pornography" of any sort or those paying to see someone take off their clothes / paying to see a nude body (opening the frightening potential for outlawing of artist's life models) would be subject to the full force of the law likely including being placed on the sex offenders register (with all the stigma that attracts) and serious custodial sentences. This approach if it wasn't so serious and authoritarian in nature would be laughable, instead it has all the hallmarks of the beginnings of a manufactured moral panic, how long before historic works of art would be deemed "exploitative" under the proposed ban on "pornography" and thereafter destroyed or removed from public view to "protect women and girls" something that would amount to purges and censorship as happened multiple times in human history. I will not state when and which administrations for fear of being accused of labelling people as members of those groups when that is not my intention.

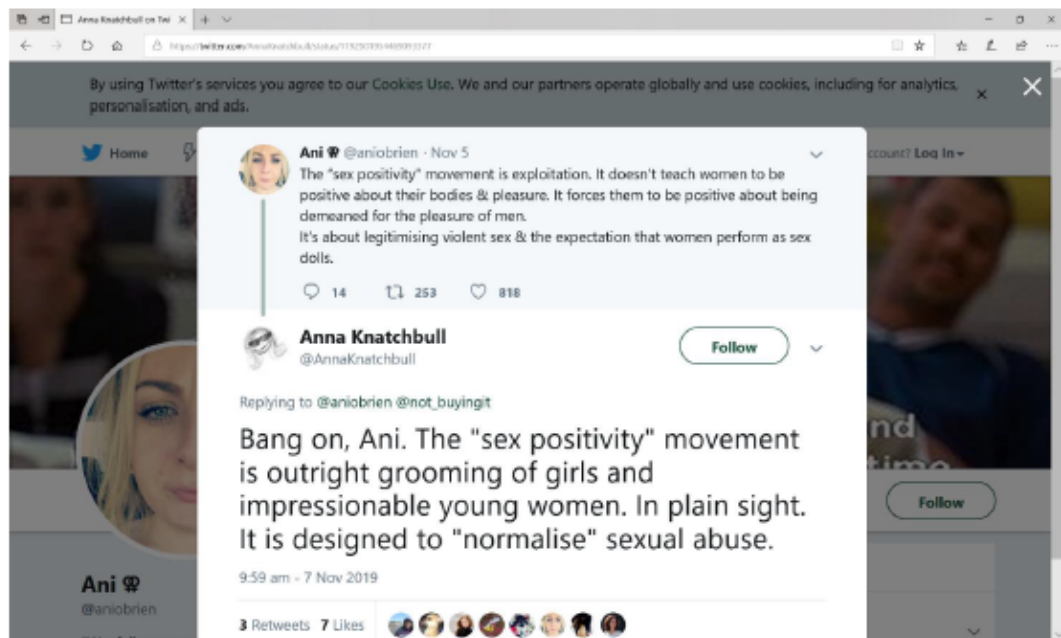
For the record I generally support the decriminalisation of drugs with treatment programs for addicts to address the many causes of addiction (many have suffered horrific childhood trauma for example), but not while an illiberal moral crusade to ban what some of its proponents deem to be "harmful filth" is being undertaken without genuine public demand for these measures.



I also note that it has been stated that the intention is solely to ban “exploitative sex”, however there is no definition of “exploitative sex”, which leaves open the strong potential for a constant increasing of its scope and leading to state interference in the private lives and consensual sexual practices of consenting adults, a prospect that concerns me very deeply.

Sex positive feminists appear to have been wholly excluded from the Equally Safe policy creation, for starters I see no reference to any input from “Feminists against censorship” - who spoke in the Scottish Parliament in 2010 strongly opposing a ban on pornography, a ban that was voted down not 9 years ago yet the Scottish government continues to attempt to drive one through, despite there being little or no public support for one, nor have any other feminist groups been included apart from sex-negative feminist groups such as Nordic Model Now, who seem to have been given a outsized role and importance in policy formulation and decision making despite being a grassroots pressure group with extremely strongly held but wholly one sided views, their twitter account for example retweeting users who strongly oppose those that question, oppose or refuse to implement the “Nordic Model”, which could suggest an unwillingness to consider alternative views or open mindedly engage in reasoned debate.

Note this retweet of comments made against those with sex positive views:



Hardly a massive outpouring of tolerance and makes allegations that are wholly false and defamatory in nature, when in reality the sex positivity movement generally seeks high quality factual sex education provision to improve sexual health and wellbeing of women and men, but yet is attacked by anti sex feminists in aggressive terms as shown above. The fact that Nordic Model Now retweeted this while advising the Scottish Govt on policy is deeply concerning given the serious nature of the false allegations levelled. I think this shows a serious error of judgement by the SNP for inviting Nordic Model Now to advise (and continue to advise) on the Equally Safe policy, in my view it raises serious questions about what vetting if any was done in regard to NMN and their views by the Scottish Govt, given NMN's central role in devising the Equally Safe policy, why has no one in the Scottish Govt noticed or taken any action over troubling views like the above being publicly promoted by a group appointed by them to advise on policy.

Furthermore there has been no involvement from any of the relevant workers collectives / unions, their views and experiences have been completely ignored by the Scottish Govt, seemingly viewing them collectively as exploited victims who cannot speak for themselves. Which is the very antithesis of feminism, however it is justified under the umbrella of this conduct is being carried out under the guise of “protecting women”, a convenient cover for to avoid criticism of what I feel will be the institution of illiberal and harmful restrictions that will not solve the issue of trafficking and will instead put those working in these industries (willingly or trafficked) at greater risk of harm and drive them underground, however they seem to be viewed as “collateral damage”, given the lack of direct engagement with them.

I am also wary of issuing too harsh a condemnation of some aspects of Equally Safe or making firm points in some areas, due to what I perceive as a chilling effect on free speech currently happening in Scotland, due to the ambiguity of “fair comment” under Scottish libel law for anyone who is not legally trained or sufficient financial means to defend such an action, particularly given the “mob mentality” on social media, particularly directed at those who voice opposition to Scottish Government policies. Whilst many aspects of Equally Safe are laudable in their aims, the conflation of stripping and pornography with human trafficking is in my opinion unacceptable and makes no distinction between those who are trafficked and those who willingly take part of their own free will, in fact ignoring their very existence.

Before I am accused of misogyny and promoting gender-based violence, “abuse of women” etc as I know some proponents of a ban on SEVs will likely do, I will firmly state that I have NO tolerance for trafficking or coercion. I will also in response to the expected : “I bet you wouldn’t be happy if it was your sister, wife, daughter, mother etc” reply with the following statement: My response to this offensive intimation that I would seek to control my female relatives is - I would trust ANY of them to make their own decisions, I believe they are more than capable of making their own choices and know their own minds, I value their independence, however I would let them know that I would always be there to listen, help and support them no matter what choices they made.

I find the implication that men are by default controlling abusers with a hold over women and that I would or should prevent my female relatives from doing work of their choosing that I may or may not agree with, to be reprehensible, grossly offensive, paternalistic and extremely anti-feminist, not to mention defamatory and sexist in nature. It also seriously calls into question the accuser’s commitment to feminist values, instead they appear more concerned with forcing their views and morals onto others, supporting using the power of the state to intimidate and criminalise large sections of the population to achieve their aims, while stoking up a moral panic to push through restrictive laws.

It’s not my place to tell my female relatives what they can and cannot do and I deplore those women who try to dictate what is acceptable or immoral to other women under the cloak of feminism, when in fact their attempt to exert control over the lives of other women is extremely anti feminist and authoritarian and being being a female in a position of power does not in my view entitle you to order other women around or denigrate them as “unwittingly exploited” or “brainwashed by the patriarchy”, something I find patronising and downright out of order when they have made an informed decision of their own free will.

I fully support women’s rights of autonomy and without question, their rights to do whatever job they choose: whether that be bricklayer, hairdresser, sailor, mechanic, stay at home parent, brain surgeon, chef, driver, pilot, porn actor, stripper or any other job for that matter. Accusing them of harming others and promoting harmful behaviour because of their job is no better than the reprehensible claim that a woman wearing “sexy” or revealing clothing was “asking to be assaulted



or raped". Society has rightly condemned attitudes like this time and time again, yet these claims are being dusted off and used to justify enacting authoritarian laws under the heading of "protecting women" and making them equal. As Benjamin Franklin once said "Those who would give up essential Liberty, to purchase a little temporary Safety, deserve neither Liberty nor Safety"

While our country is not perfect in terms of gender equality, we are far from being this chauvinist, misogynist hell that some would like to claim. For starters we have a female First Minister, a gender balanced cabinet, up until recently the last 2 leaders of the Scottish Conservative and Unionist party were female, the Scottish Labour party has had at least 2 female leaders in very recent history, the UK liberal democrats have a female leader, we have a large number of female MSPs and MPs (albeit more can always be done to encourage more to stand for election) and local authority councillors. We have had 2 female prime ministers and multiple senior female cabinet ministers including many of the recent Home Secretaries, our armed forces now allow women to serve in virtually all roles including the submarine service and the Royal Marines and we have women police officers at all levels including leading the Metropolitan Police Service.

I strongly support the rights of those male, female and anywhere in between on the gender spectrum who choose willingly to work in the SEV and Pornography sectors (and again note WILLINGLY without coercion or trafficking) to pursue their careers without harassment by the authorities, not be subject to criminalisation to salve the moral fervour of a small minority and not to be patronised by the morally outraged or prohibition minded sex-negative groups, who claim to speak for ALL women yet only represent the views of a very small section of both women and society.

I believe that those who willingly work in SEVs are intelligent adults with their own minds and more than capable of making their own minds up. Many do it as the hours are flexible and allow them to pursue study, care for family or simply to top up their income. Others enjoy the enhanced pay compared to other work, the interaction with the public and the acceptance of a range of body shapes and sizes, for some it's the only work available that pays the bills. Taking that work away will have serious consequences and do serious harm.

There are bad operators in the industry (as there are in other industries – try working in retail for starters and suffer ill health, you'll rapidly be subject to punitive sanctions and "absence management" before being dismissed) but this is no reason to indulge in an orgy of prohibition driven by moral outrage. The bad operators could be addressed and dealt with by building trust with the employees i.e. by not treating them like brainwashed imbeciles and instead treating them as grown adults with their own minds – for example I would suggest talking to some of the workers unions that have sprung up in Glasgow in response to the fear that these consultations are a precursor to shutting down their places of work, thereby removing their financial security and pushing them onto welfare and actually listen to the views and experiences of these ladies instead of relying on what is a one sided argument with some dubious claims made to attempt to silence those questioning the validity of this approach or in fact any opposition to this approach which has been solely derived from a single prohibition driven viewpoint, a viewpoint that removes the agency of these women working in SEVs and infantilises them.

We already have strict laws on the statute book to combat trafficking, rape, sexual assaults etc the problem is lack of lack of police resources and lack of trust between those who work in SEVs and other "sex" work and the police due to societal prejudice, attitudes within the police itself and fear of persecution by the authorities and being outed to their neighbours and ostracised by some in society who frankly can't mind their own business.

This ostracization that will only get worse with the relentless and in my view flawed push by the Scottish Government to pursue and expand on the flawed Nordic model from its original aim of

tackling prostitution in Sweden, a model already forcibly condemned by Amnesty international no less in a well-researched report and condemned by other academics and organisations (see <sup>1 2 3 4 5 6</sup>) for being seriously counterproductive and downright harmful even at efforts to tackle violence against women and human trafficking even when solely applied to prostitution, yet the Scottish Government wants to use the model to justify criminalising pornography and SEV's also and is wilfully deaf to the mounting evidence against the Nordic Model but yet will not put the brakes on and consider a wider range of voices out with their 2 chosen advisors – Nordic Model Now (strong supporters of censorship, prohibition (though they choose to use abolition instead) and even oppose surrogacy) and the Soroptimists, which in my opinion creates an echo chamber containing only one viewpoint, which is wholly unacceptable when drawing up laws and makes a mockery of the Scottish Government's oft repeated claim to seek consensus and consult on what they do, how can you have a debate when only one side is represented, how can you consult with only one restrictive prohibitionist option on the table? Particularly when mainstream majority groups and voices in the feminist movement alone, let alone society at large have been shut out entirely in favour of input from small group with extremely hard-line views, That's not democracy, its authoritarian and social engineering at its worst. I don't recall anything beyond a tiny minority demanding a ban on pornography for example in the last 12 years, yet this is stated Scottish Government policy.

The Amnesty report provoked a strong response from Nordic Model Now<sup>7</sup>, (Note the luridly coloured graphic at the top of the page inferring that Amnesty International are biased – which I leave the reader to draw their own conclusions over) who for example claimed it was unfair to study Norway and not Sweden, amongst other vigorously stated points, whose merits I will not offer comment on. However I found the graphic claiming Amnesty International to be biased as very distasteful, particularly in light of Amnesty's decades long advocacy in support of human rights and victims of abuses throughout the world, from a range of disparate cultures. I also felt that it was a reaction to someone pointing out flaws in the Nordic Model and that it was an attempt to discredit Amnesty International in the eyes of the public, others may disagree however.

The Home Affairs Select Committee at Westminster also conducted a review into prostitution and their review examined many models, finding flaws particularly with the Nordic model, the review can be accessed here :

<https://publications.parliament.uk/pa/cm201617/cmselect/cmhaff/26/2602.htm>

Nordic Model Now have rejected the review and have attempted to force the withdrawal of the report, recently due to the alleged actions of one member of the committee Keith Vaz, dubbing it the "Vaz Report", note one member of this cross party committee which included a member from the

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<sup>1</sup><https://medium.com/@aleknielsen/nordic-model-the-ongoing-criminalization-of-sex-workers-in-northern-europe-c1df02ba94ae>

<sup>2</sup>[https://www.amnestyusa.org/files/norway\\_report\\_-\\_sex\\_workers\\_rights\\_-\\_embargoed\\_-\\_final.pdf](https://www.amnestyusa.org/files/norway_report_-_sex_workers_rights_-_embargoed_-_final.pdf)

<sup>3</sup><https://www.thenation.com/article/amnesty-international-calls-for-an-end-to-the-nordic-model-of-criminalizing-sex-workers/>

<sup>4</sup>[https://www.nswp.org/sites/nswp.org/files/Swedish%20Law%20to%20Criminalise%20Clients\\_A%20Failed%20Experiment%20in%20Social%20Engineering\\_2012.pdf](https://www.nswp.org/sites/nswp.org/files/Swedish%20Law%20to%20Criminalise%20Clients_A%20Failed%20Experiment%20in%20Social%20Engineering_2012.pdf)

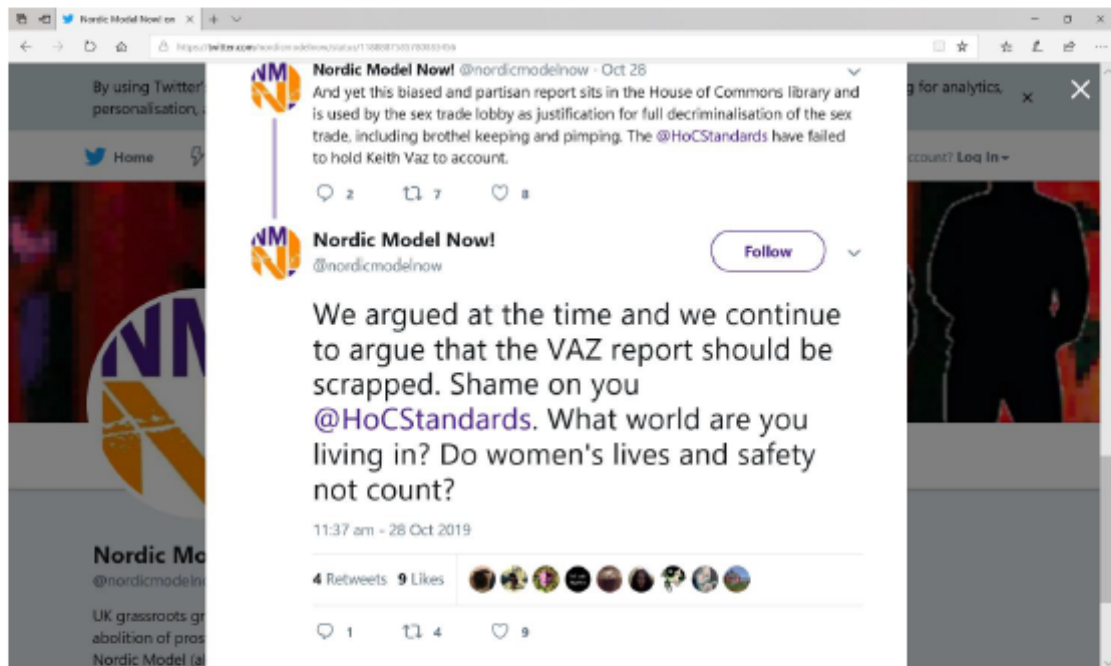
<sup>5</sup><https://www.nswp.org/sites/nswp.org/files/The%20Real%20Impact%20of%20the%20Swedish%20Model%20on%20Sex%20Workers%20Advocacy%20Toolkit%2C%20NSWP%20-%20November%202015.pdf#page=29>

<sup>6</sup><https://humboldt1982.files.wordpress.com/2012/12/dangerous-liaisons.pdf>

<sup>7</sup><https://nordicmodelnow.org/myths-about-prostitution/myth-amnestys-research-in-norway-has-proved-the-nordic-model-is-harmful-to-sex-workers/>



SNP, so therefore I believe it is unfair to describe the committee's report in this way. I've included some screengrabs of their tweets on the subject, to demonstrate the wording used by Nordic Model Now.



I believe any disorder in the community would not come from any proposed venue or its customers but instead from morally outraged pressure groups, sex-negative feminists and others intent on turning this country into something akin to Iran or Saudi Arabia where strict codes of behaviour are instituted into law and the power of the state and its agencies used to enforce compliance with the diktats handed down, denying others the right to decide for themselves or even to hear their viewpoint. This however should not justify a restriction on SEVs as otherwise it vindicates mob rule and justifies intimidation and criminal disorder.

From reading previous published studies it has been stated that SEVs generally have much lower rates of recorded disorder and requirement for Police attendance particularly when compared to public houses and nightclubs. Any potential disorder could be managed by for example requiring the venue to have an adequate number of trained door staff on hand as done by many nightclubs, security cameras where appropriate, a linkup between the health and social care partnership and the venue(s) to ensure that any venue was operating ethically and for the police to provide a liaison officer to provide a single point of trusted contact for any staff member to report concerns about other staff, customers or pressure groups harassing /stalking them etc (religious groups in particular have form for this sort of conduct in the USA in particular, where workers in SEVs have been followed home and intimidated with threats of violence and eternal damnation, threatening notes quoting bible verses left on their vehicles or posted through their doors etc – I hope however that people in Scotland are above that sort of intimidation and generally that has been my experience, but there is sadly always a minority who would indulge in this conduct)

I take a live and let live approach to life, provided someone does not attempt to force their views down my throat or compel me (or others) to comply with their moral code, then I have no issue,

however I take strong issue with those who demand others comply with their demands and abuse and denigrate those who refuse to meet their demands or even dare question their demands.

I find the suggestion of "bras and pants for the women and underpants for the men" as reported by local media to be out of step with the modern world and frankly outmoded, people wear more revealing outfits on the beach and in nightclubs (club Tropicana often being a popular theme), many pop performers such as Little Mix wear little more than underwear while performing on stage at venues such as Slessor Gardens in Dundee in front of the public, including children and as yet there has been no moral collapse in Dundee / Tayside after their performances, no surge in rapes and sexual assaults after their performances, nor any public outrage at their attire (well apart from a tiny perpetually offended minority)

I would concur that SEV performers dressing as schoolchildren is not in anyway acceptable particularly in the current social climate, but the line could be difficult to draw and enforce and would require very careful wording to avoid being overly broad in its definition to avoid abuse by those intent on making mischief, I would suspect that the occurrence of exotic dancers in SEVs wearing school uniforms is over stated compared with its actual occurrence rate (however I stand to be corrected)

We are all born naked and various courts in the UK have repeatedly ruled that nudity in itself is not a crime (with some exceptions) So I find the hang ups about nudity perplexing frankly, and it suggests that this country still has elements beholden to Benedictine views regarding clothing, given its ability to scandalise. If we accept and permit people to dance "provocatively" fully clothed (the (tame by modern standards) dancing of Elvis Presley was deemed scandalous by some in the 1950s, which demonstrates how far the attitudes of society have shifted), so why does it become such a major issue when someone is nude?

I also note there is no attempt being made by the Scottish government to outlaw boxing, mixed martial arts such as UFC etc despite these involving copious levels of graphic violence and often serious injury to the participants, who in boxing often come from deprived backgrounds and these young men use it as way to earn decent incomes. I fear we are becoming like the USA where anything that remotely be construed as related to sex is forbidden and "inappropriate" yet gratuitous levels of violence attract little or no comment. (For the record I do not oppose boxing or UFC/MMA, I'm just using it as an example to demonstrate the hypocrisy and pearl clutching being voiced by some in regard to this matter)

I would say that anyone who finds the idea of an SEV distasteful can simply avoid /not frequent the venue, allow the business to thrive or die on its own merits or failures. If it thrives then it demonstrates that Angus residents are using the business, if it fails then it demonstrates that there is no local demand.

If there is disorder associated with the premises, then like any other business the Police and Angus Council both have powers to address this, ditto for any other issues that may arise. The "ick" factor that some feel about SEVs should be no bar to their operation as otherwise it is shameless moralising and an attempt to turn back the clock to some imagined "purer" period in time. To put it perspective even in 1910 there were venues where nude dancers were performing "fan" dances to titillate the public, and even in early printed materials from several hundred years ago there were illustrations that were of an adult nature and "bawdy" texts, so this is not a modern explosion of immorality, instead something that society has lived with and consumed for hundreds of years.

Lady Chatterley's Lover is generally considered to be a non-controversial book today but on its release was referred to by some as "obscene" due to the descriptions contained within and led to a

court case which ruled it was not obscene, a claim of obscenity regarding this book would be seen as prudish today by the majority of the populace, especially when books like "50 shades of grey" are best sellers, stocked in supermarkets and popular with women of all ages even those of a more senior age bracket, proving that society is not as prudish and easily scandalised as some would have the public believe. Albeit I note that some sex-negative feminist groups in particular are virulently opposed to anything beyond the most vanilla of sexual contact between men and women, considering books such as 50 shades to be normalising sexual abuse and advocating for it and similar titles to be banned, some radical feminists oppose ANY sexual contact between men and women, judging it to be "exploitative" due to their perception of a massive gender power imbalance and their view that women cannot give consent unless the sexes are equal – a very minority view in society at large, but which alarmingly has gained traction in some circles, the same circles which have pushed for a ban for years on material showing the naked human form in any context, which they deem to be exploitative and pornographic in nature, even when said images are works of art. See the Manchester Art Gallery that removed a work of classical art because a feminist group deemed it exploitative and only reinstated the work due to public outcry over its removal and thereafter claiming its removal was only intended to be "temporary", I strongly suspect if there had been no outcry, the painting would have hidden away in storage, deemed "inappropriate for public display" and "offensive", with many other similar works removed also in short order.

It is no longer 1870, the public strongly oppose politicians and activist groups moralising or forcing their own personal religious or moral opinions onto the body public, perhaps some would like to live in Iran or North Korea where the authorities have complete control over the lives of the populace and can compel them to follow a strict code of behaviour via the use of "morality police" as in Saudi Arabia, however I personally would prefer to live in a free country where lawful businesses are not harassed or subjected to arbitrary criminalisation, nor their customers or staff bullied and intimidated by a morally outraged, anti feminist, sex negative minority.

## 5.DUNCAN YOUNG

**From:** [REDACTED]  
**To:** [LAWLicensing](#)  
**Subject:** Sex venues  
**Date:** 02 December 2019 18:19:57

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As a resident of Arbroath and Angus and as a community activist i feel those sort of places should not get to open in Arbroath or Angus as a whole because i feel it would open a door to organised crime gangs and it would destroy Arbroath and Angus reputation because they are degrading to humen beings so i do not support anything to do with the sex trade.

Yours sincerely

DUNCAN YOUNG



## 6.ANGUS WOMEN'S AID

**From:** [Anne Robertson Brown](#)  
**To:** [LAWlicensing](#)  
**Subject:** Civic Government (Scotland) Act 1982 - Sexual Entertainment Venues  
**Date:** 03 December 2019 16:12:44  
**Attachments:** [image001.png](#)

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Good Afternoon

I am writing on behalf of Angus Women's Aid to comment on the above.

In respect of the specific questions posed:

1. Should Angus Council require Sexual Entertainment Venues (SEVs) to be licensed?

**Absolutely yes. Whilst we condemn sexual exploitation of all forms the very possibility of premises being unlicensed and perhaps promoting the sexual exploitation of young women is a very real threat in Angus. We would campaign against such premises being opened however we would also argue that the safety net of strict licensing and inspection is needed.**

2. What impact do you consider a SEV might have (such as on you or on the area you live)?

**We are already seeing a dramatic increase in the number of young women reporting domestic abuse , including sexual abuse as a component of the domestic abuse they have experienced. At the recent "Rounding the Edges " event in Arbroath this was echoed by all agencies – statutory and non-statutory. Angus may not have a problem with on street prostitution but it does have a prostitution problem. SEVs will exponentially increase this .**

**We have a major issue in schools in Angus with misogyny and gender based violence. E.g. Up skirting/ non-consensual sharing of images etc. The consumption of pornography online has escalated. It is estimated that the average age of accessing pornography is around 8 years old. SEVs would provide an attraction to a cohort of young men and will lead to further exploitation of young women in Angus.**

3. If the council decide to require SEVs to be licensed, what matters should be taken into consideration in developing a Sexual Entertainment Venue Policy Statement?

**I would suggest that Angus Council requests the support of Angus Violence Against Women Partnership in drafting this.**

Regards

*Anne*

Anne Robertson Brown,  
Executive Director Angus Women's Aid (including AWARE & Angus MIA Service)

*Please note I work Monday, Tuesday, Thursday and Friday.*



**Angus Women's Aid delivering trauma responsive services to women and children since 1978.**

*Angus Women's Aid Supporting Women, Children and Young People in Angus affected by domestic abuse since 1978 because women have the right to a specialist domestic abuse service, including refuge and children have the right to be safe not scared.*

**#humanrightsdefenders**

**Secure email: [anne.brown@aware.cjsm.net](mailto:anne.brown@aware.cjsm.net)**

*(please use secure email if you are sending personal details of women, children or young people)*

Our office address is 7 Lindsay Street, Arbroath, DD11 1RP. Our office telephone number is 01241 439437.

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*Registered address: 15 James Street, Arbroath DD11 1JP Tel: 01241 439437*

[www.anguswomensaid.co.uk](http://www.anguswomensaid.co.uk)

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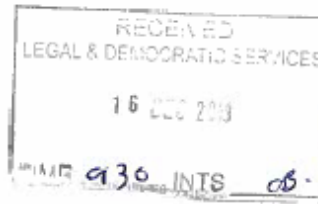
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*The views of the author may not necessarily reflect those of Angus Women's Aid*

10/12/2019

Your Ref: LK

Head of Legal and Democratic  
Services  
Angus Council  
Angus House  
Sylvie Way  
Forfar  
DD8 1AN



**POLICE  
SCOTLAND**

Keeping people safe

Tayside Division Headquarters  
West Bell Street  
Dundee  
DD1 9JU

Dear Sir/Madam,

**CIVIC GOVERNMENT (SCOTLAND) ACT 1982  
SEXUAL ENTERTAINMENT VENUES**

I refer to your correspondence dated 05 November 2019, in relation to the licensing of Sexual Entertainment Venues.

In relation to the questions contained within the consultation, I would like to submit the following response:

1. It is the opinion of Police Service of Scotland that it is important that Angus Council do require Sexual Entertainment Venues to be licensed. This is to protect people who work and frequent the premises.
2. It is possible that SEV's may increase criminality in the area, given that they request later operating hours and attract persons who may have consumed a large quantity of alcohol before attending. There may be issues with anti-social behaviour, including noise, litter and potentially violence.
3. It is of our opinion that requesting for these types of venues to be licensed would provide you with the opportunity to establish certain conditions to mitigate such anti-social behaviour within such premises.
4. Police Service of Scotland would request stringent background checks on companies or persons applying for this type of licence. We would ask you consider the demand for the SEV within this area and give consideration to the core operating hours. We would strongly suggest the installation of high quality CCTV is included within the licence conditions.

Yours faithfully

A handwritten signature in black ink that reads "W. Morrison". The signature is written in a cursive style with a large, stylized initial "W".

Wayne Morrison  
Angus LPA Commander  
Tayside Division