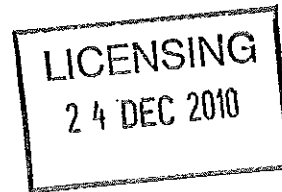


[REDACTED]
[REDACTED] Northampton [REDACTED]

21st December 2010

The Licensing Officer
Northampton Borough Council
Borough Solicitors Division
The Guildhall
St Giles Square
Northampton
NN1 1DE



Dear Madam or Sir

I am writing to OBJECT to the application for a Sexual Entertainment Venue Licence for the Urban Tiger Lap Dancing Club, Wellingborough Road, Northampton, NN1 4AA.

My objections are on the following grounds:

1. Lap dancing clubs promote 'sex-object' culture – the mainstreaming of the sex and porn industries

The growth of lap dancing clubs has fed into 'sex-object' culture – the mainstreaming of the sex and porn industries and the ever increasing sexual objectification of women and girls. With lax licensing laws leading to the number of lap dancing clubs doubling over the last five years, and a PR makeover branding lap dancing as glamorous and 'harmless fun', we have found ourselves in a situation in which major retailers sell pole dancing kits along with pink frilly garters and paper money in their 'toys and games section'¹, and leisure centres offer pole dancing lessons to girls as young as twelve². This has led to 25% of teenage girls seeing being a lap dancer as their *ideal* profession³.

2. Lap dancing clubs are linked to wider systems of prostitution

The working practices in lap dancing clubs 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

¹ Edén, I. (2007) *Inappropriate Behaviour: Adult Venues and Licensing in London*, London: The Lilith Project, Eaves Housing for Women.

² BBC News Online (2006), 'Children are Taught Pole Dancing' Tuesday, 12 December 2006, url: <http://news.bbc.co.uk/1/hi/england/tyne/6173805.stm>

³ http://www.manchestereveningnews.co.uk/news/s/161/161338_naked_ambition_rubs_off_on_teen_girls.html

As well as the structural conditions in lap dancing clubs which pressure many performers into offering extra sexual services, research further shows that, even if clubs do enforce a no touching rule, and even if there is no sexual contact between dancers and customers, **the presence of strip clubs in a locality increases demand for nearby prostitution services⁴.**

This places lap dancing on a continuum of commercial sexual activity, irrespective of whether the sexual exchange occurs within the club itself.

3. Lap dancing clubs create 'no-go' zones for women in the local vicinity

Research undertaken in the London Borough of Camden found a fifty percent **increase in sexual assaults** in the borough after the rapid expansion of lap dancing clubs⁵. Personal testimony reinforces the idea of a link between the expansion of lap dancing clubs and increased levels of sexual harassment for women in the vicinity.

The Urban Tiger is situated on a main thoroughfare into the town centre, close to shops and bus stops – men visiting the club often heckle and jeer at women on their way into or out of the club, causing women to feel unsafe and intimidated.

"Once I walked past [a local strip club] at closing time, when a stripper tried to discreetly leave the premises and a group of punters stood outside. On recognising her, they erupted into loud whooping and jeering as she ran across the road to get away. I found this behaviour completely intimidating and totally in keeping with the behaviour of the street sexual harassment that makes women feel uncomfortable on a daily basis... Punters are encouraged to engage the very attitudes and behaviour which are seen as disrespectful and intimidating to women outside strip clubs... It is vital that councils take this into account when considering applications, so that they can take appropriate measures to limit the normalisation, exploitation and legitimisation of sexism, in order that women feel safe and entitled to walk their streets without fear of harassment or abuse".

Sonia, resident who objected to a lap dancing club in Hackney.

In addition, the **UK Royal Institute of Town Planning** issued a Good Practice Note in December 2007 on the issue of lap dancing clubs and women's sense of safety⁶:

"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"

⁴ 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

⁵ Eden, I. (2003) *Lilith Report on Lap Dancing and Striptease in the Borough of Camden*, London: The Lilith Project, Eaves Housing for Women

⁶ Royal Town Planning Institute (2007), *Gender and Spatial Planning, Good Practice Note 7*, 10 December 2007

Links between the expansion of lap dancing clubs and increased levels of sexual harassment and assault led the **Women's National Commission** to include the need to regulate lap dancing clubs in their **submission to the UN Commission on the Elimination of Discrimination Against Women (CEDAW) 2005**:

"The use of women in degrading entertainment exacerbates violence against women...lap dancing and similar clubs must be regulated to ensure that local crimes against women do not increase"

4. Lap dancing clubs have a negative impact on women's safety in wider society

Lap dancing clubs normalise the representation of women as sexual objects who are always sexually available. They make sexual harassment seem normal, as what takes place within the four walls of a lap dancing club would be considered harassment in any other context.

The links between objectification, discrimination and violence against women are recognised at the international level by the legally binding **United Nations Convention to Eliminate Discrimination Against Women (CEDAW)**, which has repeatedly called on states – including the British Government - to take action against the objectification of women⁷.

Similarly the UK-based **End Violence Against Women** coalition has called on the UK Government to tackle the sexualisation of women and girls because it provides a 'conducive context' for violence against women⁸.

The links between the expansion of lap dancing clubs and an increase in the levels of sexual violence in society was raised by Glasgow City Council⁹ in response to research it commissioned into the impact of lap dancing clubs on the city:

"Images of women and 'entertainment' which demean and degrade women portraying them as sexual objects plays a part in 'normalising' sexual violence and contributes to male abuse of women being acceptable, tolerated, condoned and excused. Such entertainment runs counter to explicit commitments by a range of private, public and voluntary agencies to promoting women's equality."

5. Gender Equality Duty

Regulating the expansion of lap dancing clubs is an issue of equality, not morality.

Objections to lap dancing clubs are based on issues of equality, not morality.

⁷ 1979 Convention on All Forms of Discrimination Against Women (CEDAW) Article 5

⁸ Realising Rights, Fulfilling Obligations: An Integrated Strategy to End Violence Against Women (EVAW) 2008

⁹ Glasgow City Council report on the need for review of licensing legislation in the light of concerns re table dancing
<http://www.glasgow.gov.uk/NR/rdonlyres/0D19236F-808A-4467-96F7-6A9508C1F312/0/legtablic2.pdf>

The need for policy to be scrutinised in relation to gender equality was recognised by the Government in 2007, with the passing of the Gender Equality Duty. The Gender Equality Duty places a legal obligation on public bodies to take out Gender Equality Impact Assessments on all policy decisions to ensure that decisions do not have a negative impact on women's equality. Furthermore, the Gender Equality Duty requires public bodies to actively promote gender equality and work towards countering gender stereotypes.

Lap dancing clubs promote gender stereotypes and attitudes that say it is acceptable to treat women as sexual objects, rather than real people. They are linked to gender discrimination and sexual harassment in the workplace (as demonstrated by recent successes of sexual harassment cases in which use of lap dancing clubs has been recognised as linked to discrimination) as well as the creation of no go areas in the surrounding areas which reduce women's sense of security and entitlement to public space.

Highlighting these issues is not about morality, or 'having an issue with sex', it is about ensuring that local councils abide by their legal requirements to promote equality between women and men.

The NORTHAMPTONSHIRE Licensing Act 2003 draft Statement of Licensing Policy for Regulated Entertainment, Late Night Refreshment and the Sale of Alcohol (which I assume will be updated to incorporate SEV'S?) states the following:-

"Promotion of Equality

7.10 Over the last four decades, discrimination legislation has played an important role in helping to make Britain a more equal society. However, the legislation was complex and, despite the progress that has been made, inequality and discrimination persist and progress on some issues has been stubbornly slow.

7.11 The Equality Act 2010 provides a new cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

7.12 In implementing the Licensing Act 2003, associated legislation and guidance, this Licensing Authority is committed to ensuring that the obligations and duties within this legislation are met."

It would be inconsistent for Northampton Borough Council to grant any licences for Sexual Entertainment Venues as this would not comply with their stated equality duties.

Sexual Encounter Venues are part of an industry that markets women as sexual objects and promotes working practices that implicitly encourage men to expect and seek sexual services.

The **Gender Equality Duty 2007** requires local councils to assess the gendered impact that lap dancing clubs have on society as a whole.

The lap dancing industry is highly gendered, with men paying women to strip for them in the vast majority of lap dancing clubs - otherwise known as 'gentlemen's clubs'. The gendered nature of the industry makes the proliferation of lap dancing clubs relevant to the Gender Equality Duty making gender equality a factor which should be considered during licensing process.

The ever-increasing sexual objectification of women, facilitated by the expansion of lap dancing clubs, runs directly counter to efforts to achieve equality between women and men.

The more it becomes acceptable to view and treat women as sexual objects, the easier it becomes to disrespect women as a group. As stated by Chris Green, Director of the White Ribbon Campaign¹⁰:

Research into male motivations for visiting strip clubs found that men went to strip clubs to meet women who were not 'feminist' and who were willing to act in more 'traditional' ways¹¹.

Male customers also said that they wanted to 'let frustration out' at the ways in which they had been forced to monitor their behaviour towards women in the workplace¹² "With all of this sexual harassment stuff going around these days, men need somewhere to go where they can act like they want"

In this way, lap dancing clubs represent one of the last bastions of male privilege - a place that time forgot in relation to society's efforts to achieve equality between women and men.

Recent sex discrimination law suits against corporate use of lap dancing clubs, and top business women in *The Economist*¹³ blaming corporate strip club culture for the lack of female representation at high levels of business, demonstrate **the negative impact that lap dancing clubs have on women's equality in wider society.**

The *Sexism in the City* campaign spearheaded by the **Fawcett Society**, the UK's leading campaign for gender equality, further highlights the links between lap dancing and gender inequality as it calls on government and business to take steps to end commercial sexual exploitation, sexual objectification and sexual stereotypes as crucial measures to achieve equality between women and men in the work place¹⁴.

¹⁰ The White Ribbon Campaign works with men to end violence against women

¹¹ Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

¹² Frank, K. (2005) 'Exploring the Motivations and Fantasies of Strip Club Customers in Relation to Legal Regulations', *Sexual Behavior*, Vol. 34 (5), pp. 487 – 504

¹³ Jeffreys, S. (2008b) 'The Sex Industry and Business Practice', Seminar: School of Business, Ballara University, 21 May 2008

¹⁴ <http://www.fawcettsociety.org.uk/documents/SATC%20manifesto%20public.pdf>

6. The current coalition government supports moves to tackle businesses which promote the sexual objectification of women, including lap dancing clubs, as part of their work on violence against women.

The current **Home Secretary, Theresa May**, sent a powerful message to councils to take a bold stance against businesses which promote the sexual objectification of women when, in July 2010 at the Women's Aid Conference, she stated: "It is only when businesses appreciate their responsibility to end the sexualisation of women that some people will stop treating women like objects. And it's only when our communities stand up and say violence against women is unacceptable – that attitudes will really begin to change".

The Conservative Violence Against Women and Girls Strategy for London (2010 - 2013) explicitly refers to the links between lap dancing clubs, prostitution, trafficking and other forms of violence against women¹⁵.

7 Northampton's Central Area Action Plan

The Urban Tiger falls within the boundaries of Northampton's Central Area Action Plan. This plan presents a vision for the development of the centre of Northampton to 2026. An essential part of the overall strategy for the area should refer to the Gender Equality Duty which affects all decisions made by the Council. To this end surely an essential part of the area plan should be to eliminate all Sexual Encounter Venues within the area. The Urban Tiger lap dancing club is situated on the main road into Northampton town centre and is surrounded by shops, pubs and other local businesses. Women and children have to pass this club together with its offensive posters and publicity material in order to gain access to the central shopping area of town. This does not provide a good impression of Northampton to tourists and visitors to the town. The club is also situated close to the main bus stops for services into and out of the town centre - it is therefore very difficult to avoid or ignore it.

I would hope that the Central Area Acton plan will provide an ideal opportunity to clean up the centre of Northampton by ensuring a zero policy towards Sexual Encounter Venues and would urge the council to ensure that this forms an essential part of the policy.

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<http://www.london.gov.uk/sites/default/files/The%20Way%20Forward%20Final%20Strategy.pdf>

8. Rejection of the Sexual Entertainment Venue Licence would not lead to the Urban Tiger closing down.

In these difficult times no-one wants to see an established business having to close down. However, if the Urban Tiger had its application for an SEV licence refused, it would not have to close down, but could continue to operate on its premises licence as a licensed premises but without the element of lap dancing. **This would not lead to the loss of any jobs, as the Urban Tiger does not employ its dancers, but charges them a fee for the opportunity to dance in the club.**

Standard Licence Conditions

If Northampton Borough Council decides that it will issue a Sexual Entertainment Licence to the Urban Tiger or to any other lap dancing clubs then it is essential that standard conditions are imposed on those licences for the safety of the women performing in the clubs and for the prevention of crime. Other councils around the UK all impose conditions on SEV licences. Those standard conditions should include the following:-

1. Restriction of opening times to evenings only
2. The use of CCTV monitoring equipment throughout
3. Any external advertising of adult entertainment shall not include:
 - a) Any depiction of full nudity.
 - b) Any images of breasts, buttocks or genitalia.
 - c) Any depiction of overtly sexual or violent images or any other images which may give rise to concerns in respect of public decency or protection of children from harm.
 - d) Any overt wording such as 'striptease' 'credit crotch' or similar
4. Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting. Advertising will only be permitted on the interior and exterior of the premises. The use of ad-vans to advertise sexual entertainment venues is prohibited for public decency. No advertising allowed in media that is not exclusively aimed at adults -- this would exclude local 'family' newspapers for example.
5.
 - a) No persons under the age of 18 will be permitted on the premises.
 - b) Proof of age will be required from anyone appearing to be under the age of 25.
 - c) No performer or employee will be under the age of 18 and an employment record will be held on the premises. Adequate checks will be made to ensure compliance.

6.
 - a) No full nudity will be permitted.
 - b) There shall be no physical contact between the customers and performers.
 - c) Performers are to keep a minimum distance of 3 feet away from the customers. Notices outlining these conditions must be clearly displayed on the premises.
 - d) Performers will stop immediately and move away from any customer who is offensive or attempts to touch them and shall report such behaviour and any other inappropriate behaviour or breach of house rules to the management.
 - e) Performers will not take or give telephone numbers or business cards or in any way solicit themselves.
 - f) No dancing or entertainment shall be provided in dedicated private booths within the premises.
 - g) All performers will at the conclusion of their last performance, leave the premises and not return that day.

These conditions would go some way to protecting women working in lap dancing clubs and women in the wider community.

However, because of the negative impact that lap dancing clubs have on women's equality and women's safety as outlined above, I ultimately call on you to take a bold stance against the growth of lap dancing clubs by rejecting all applications for SEVs, and in particular, by rejecting this application by the Urban Tiger for a Sexual Entertainment Licence.

Yours faithfully

A large, dark, irregularly shaped redacted area covering the signature and name of the sender.

Northampton

A small, dark, rectangular redacted area covering the address.