

## LICENSING SUB COMMITTEE (SEV'S)

## MEETING TO BE HELD IN CIVIC HALL, LEEDS ON

THURSDAY, 14TH JUNE, 2012 AT 1.30 PM

## **MEMBERSHIP**

## **Councillors**

- S Armitage Cross Gates and Whinmoor;
- B Gettings Morley North;
- G Hussain Roundhay;
  - P Latty Guiseley and Rawdon;
  - B Selby Killingbeck and Seacroft;

Agenda compiled by: Tel No: Governance Services Civic Hall LEEDS LS1 1UR Helen Gray 247 4355

Ward	Item Not Open		Page No
		PRELIMINARY PROCEDURAL ISSUES	
		ELECTION OF CHAIR	
		APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS	
		To consider any appeals in accordance with Procedure Rule 25 of the Access to Information Procedure Rules (in the event of an Appeal the press and public will be excluded)	
		(*In accordance with Procedure Rule 25, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before the meeting)	
	Ward		Open         PRELIMINARY PROCEDURAL ISSUES         ELECTION OF CHAIR         APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS         To consider any appeals in accordance with Procedure Rule 25 of the Access to Information Procedure Rule 25 of the Access to Information Procedure Rules (in the event of an Appeal the press and public will be excluded)         (*In accordance with Procedure Rule 25, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before

## EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC

To highlight reports or appendices which:

- a) officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.
- b) To consider whether or not to accept the officers recommendation in respect of the above information.
- c) If so, to formally pass the following resolution:-

**RESOLVED –** That the press and public be excluded from the meeting during consideration of those parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information

**2)** To note that under the Licensing Procedure rules, the press and the public will be excluded from that part of the hearing where Members will deliberate on each application as it is in the public interest to allow the Members to have a full and frank debate on the matter before them.

## LATE ITEMS

To identify any applications as late items of business which have been admitted to the agenda for consideration

(the special circumstances shall be identified in the minutes)

		DECLARATION OF INTERESTS
		Members are reminded to declare any interests at the start of the hearing on each application for the purpose of Section 81 (3) of the Local Government Act 2000 and paragraphs 8 to 12 of the Members Code of conduct
		HEARINGS
City and Hunslet	10.4(1, 2, 3)	APPLICATION FOR THE GRANT OF A SEX ESTABLISHMENT LICENCE FOR:SILKS, 2 SOVEREIGN PLACE, LEEDS LS1 4SP
		To consider a report of the Head of Licensing and Registration on an application made under section 2 and schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 (the Act) for the grant of a sex establishment licence to premises known as Silks, 2 Sovereign Place, Leeds 1, to be used as a sexual entertainment venue.
		PLEASE NOTE Appendix B of the report is exempt from publication under Access to Information Procedure Rule 10.4 (1, 2 & 3)

#### **CONFIDENTIAL AND EXEMPT ITEMS**

The reason for confidentiality or exemption is stated on the agenda and on each of the reports in terms of Access to Information Procedure Rules 9.2 or 10.4(1) to (7). The number or numbers stated in the agenda and reports correspond to the reasons for exemption / confidentiality below:

#### 9.0 Confidential information – requirement to exclude public access

9.1 The public must be excluded from meetings whenever it is likely in view of the nature of the business to be transacted or the nature of the proceedings that confidential information would be disclosed. Likewise, public access to reports, background papers, and minutes will also be excluded.

#### 9.2 Confidential information means

- (a) information given to the Council by a Government Department on terms which forbid its public disclosure or
- (b) information the disclosure of which to the public is prohibited by or under another Act or by Court Order. Generally personal information which identifies an individual, must not be disclosed under the data protection and human rights rules.

#### 10.0 Exempt information – discretion to exclude public access

- 10. 1 The public may be excluded from meetings whenever it is likely in view of the nature of the business to be transacted or the nature of the proceedings that exempt information would be disclosed provided:
  - (a) the meeting resolves so to exclude the public, and that resolution identifies the proceedings or part of the proceedings to which it applies, and
  - (b) that resolution states by reference to the descriptions in Schedule 12A to the Local Government Act 1972 (paragraph 10.4 below) the description of the exempt information giving rise to the exclusion of the public.
  - (c) that resolution states, by reference to reasons given in a relevant report or otherwise, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
- 10.2 In these circumstances, public access to reports, background papers and minutes will also be excluded.
- 10.3 Where the meeting will determine any person's civil rights or obligations, or adversely affect their possessions, Article 6 of the Human Rights Act 1998 establishes a presumption that the meeting will be held in public unless a private hearing is necessary for one of the reasons specified in Article 6.
- 10.4 Exempt information means information falling within the following categories (subject to any condition):
  - 1 Information relating to any individual
  - 2 Information which is likely to reveal the identity of an individual.
  - 3 Information relating to the financial or business affairs of any particular person (including the authority holding that information).
  - 4 Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or officer-holders under the authority.
  - 5 Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
  - 6 Information which reveals that the authority proposes
    - (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
    - (b) to make an order or direction under any enactment
  - 7 Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime

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0113 2474095

## Report of the Head of Licensing and Registration

## **Report to the Licensing Sub Committee**

## Date: 14<sup>th</sup> June 2012

## Subject: Application for the grant of a sex establishment licence for:

## Silks, 2 Sovereign Place, Leeds LS1 4SP

Are specific electoral Wards affected? City and Hunslet	🛛 Yes	🗌 No
If relevant, name(s) of Ward(s):		
Are there implications for equality and diversity and cohesion and integration?	Yes	🛛 No
Is the decision eligible for Call-In?	🗌 Yes	🖂 No
Does the report contain confidential or exempt information?	🛛 Yes	🗌 No
If relevant, Access to Information Procedure Rule number: 10.4 (1, 2	& 3)	
Appendix number: B		

Tel:

## Summary of main issues

Members are requested to consider an application received for a sex establishment licence. The premises intend to operate under the terms of the licence as a sex entertainment venue.

## **1.0 Background Information**

- 1.1 The Policing and Crime Act 2009 amended the Local Government (Miscellaneous Provisions) Act 1982 Section 2 and Schedule 3 to introduce a new classification of sex establishment, namely sexual entertainment venues. This brings to lap dancing, pole dancing and other "relevant entertainment" into the same regime that has licensed sex shops and sex cinemas in the Leeds area since 1982.
- 1.2 Until now, premises have operated within the Leeds district providing sexual entertainment, primarily lap dancing under the terms of the Licensing Act 2003.
- 1.3 Leeds City Council adopted the provisions of Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009 on 19<sup>th</sup> January 2011 with effect from 1<sup>st</sup> October 2011.

- 1.4 In September 2011 Leeds City Council adopted its Statement of Licensing Policy for the Licensing of Sex Establishments. Members have been provided with a copy of the approved policy and this will be available for reference at the meeting.
- 1.5 From 1 October 2011 until 31 March 2012 operators of sexual entertainment venues were able to apply for a sex establishment licence for their business. Applications received before 31<sup>st</sup> March 2012 must all be determined at the same time.
- 1.6 All licences granted for sexual entertainment venues will come into effect on the 1<sup>st</sup> October 2012 unless immediate effect has been requested. Until that time all existing premises may continue to provide sexual entertainment under the provisions of the Licensing Act 2003.
- 1.7 Those premises which do not have a sex establishment licence on 1<sup>st</sup> October 2012 must cease trading.

## 2.0 Purpose of this report

2.1 To advise Members of an application made under section 2 and schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 (the Act) for the grant of a sex establishment licence for premises known as `Silks' of Sovereign Place, Leeds 1, to be used as a sexual entertainment venue.

## 3.0 History of premises

- 3.1 This is the first application for a sex establishment licence due to the implementation and adoption of new legislation.
- 3.2 The premises have operated and provided sexual entertainment under the provisions of their premises licence issued under the Licensing Act 2003 authorising the sale of alcohol and regulated entertainment. Licensing records confirm that the premises have held a premises licence since 13<sup>th</sup> March 2009.

## 4.0 The Application

- 4.1 Members are required to consider this application for the grant of a sex establishment licence to authorise the activity of sexual entertainment.
- 4.2 The application is made by Red Carpet Leisure (Leeds) Limited of 100 Roundhay Road, Leeds LS8 5AN.
- 4.3 The application is for premises known as `Silks', 2 Sovereign Place, Leeds LS1 4SP. The ground and first floors are to be covered under the provisions of the licence.
- 4.4 The proposed hours of operation are 21:00hrs until 06:00hrs Seven days a week .
- 4.5 A partial copy of the application may be found at appendix A to this report. It should be noted that certain information submitted within the application is

potentially exempt information under Access to Information Procedure Rule 10.4 (1,2 and 3) as it includes information which relates to individuals, is likely to reveal the identify of an individual and and/or relates to the business affairs of any particular person. As a consequence Members are provided with a full copy of the application contained within a separate appendix B and will be asked to consider exclusion of the press and public from the hearing if those matters are to be discussed.

- 4.6 Members will also find attached to this report at appendix C additional documents supplied with the application, which include:
  - Welfare Policy
  - Dancers Code of Conduct
  - Customers Code of Conduct
  - Fining Policy
  - Pricing Policy
  - Trade Union Details
- 4.7 A consideration for Members is the external appearance and all methods of advertising. This may include advertising to be displayed on any vehicles used to promote the business.
- 4.8 Any written, visual or auditory advertisement material, posters, signage or window display must not be of a sexually explicit or suggestive nature, will not contain images or text of a sexually explicit, obscene or offensive nature.
- 4.9 Attached at appendix D Members will find the information supplied in this respect. Due to printing quality, original samples will be available at the meeting.
- 4.10 It is confirmed that the business intends to provide vehicles to transport customers or performers to and from the premises. A Public Service Vehicle Operator's Licence is held for this purpose.
- 4.11 A map of the location of the premises can be found at appendix E.
- 4.12 A plan showing the layout of the premises including stage, bars, cloakroom, wc's performance area, dressing rooms, and CCTV has been supplied and will be available at the meeting.
- 4.13 The West Yorkshire Police and all ward members have been notified of this application.
- 4.14 A public notice advertising the application has been displayed at the premises for a period of 21 days and published in the local press.

#### 5.0 Objections

5.1 In considering any application for the grant of a licence the authority shall have regard to any observations submitted by the chief officer of police and any objections received.

- 5.2 Any objection must be provided in writing to the authority, stating in general terms the grounds of the objection, and this should be provided no later than 28 days after the date of the application.
- 5.3 Members should note that objections may be accepted following the 28 day notice period. This as a result of a case (Miss Behavin' Ltd v Belfast City Council) where the House of Lords held that while the Act required an authority to take account of objections lodged in time, it did have a discretion to take into account late objections if these brought significant relevant information.
- 5.4 The Act imposes no pre-qualifications on who may be objectors nor is there any constraint on the grounds upon which the objection is made.
- 5.5 The application attracted a total of 29 objections, 3 of which are from elected members, and one which has been received from a member of parliament. These are attached at appendix F.
- 5.6 A further objection has been received from Councillor Rebecca Charlwood. This has been counter signed by a further 19 elected members, 8 members of parliament, 1 member of European parliament, and 4 leaders of religious groups. This is attached at appendix G.
- 5.7 Members are requested to note that the Act only provides reference to the authority having regard to objections. This application also attracted 4 letters of support which have been included for Members attention. These are attached at appendix H.
- 5.8 No observations have been received from the police concerning this application.
- 5.9 Members will note that the author's identity has been omitted from a number of the letters attached. The Act requires the authority to withhold personal identity unless consent to the contrary has been supplied.
- 5.10 Members should note that further letters of objections have been received following the 28 day notice period. However, officers reviewed the contents and can confirm that these not bring any new significant and relevant information to that already provided in those letters attached.
- 5.11 A further letter of support has also been received after the 28 day notice period, officers have reviewed the contents of this and confirm that it does not bring any new significant and relevant information to that already provided.

## 6.0 Other matters relevant to the application

6.1 A sex establishment licence will remain in force for up to one year, or for a shorter period should the licensing authority think fit.

- 6.2 The Leeds City Councils Statement of Licensing Policy for Sex Establishments does not set a limit or desired location for sex establishments but instead each application will be considered on it's own merits.
- 6.3 The Statement of Licensing Policy includes standard conditions to be applied to all licences. Members may decide on a case by case basis whether any of the conditions may be dispensed with, added to or modified. Members attention is drawn to appendix I which sets out the standard conditions, which includes matters such as:
  - conduct on the premises,
  - external appearance and layout of the premises,
  - advertising
  - management,
  - safety and security
  - staff welfare, including fining and pricing policies, codes of conduct for customers and entertainers,
  - use of vessels, stalls and vehicles,

## 7.0 Options available to members

- 7.1 The licensing sub-committee may take any of the following steps it considers necessary:
  - Grant the application as requested attaching the standard conditions.
  - Grant the application whilst imposing additional conditions and/or altering the standard conditions or altering in any way the proposed application.
  - Refuse the application on the following mandatory grounds;
    - if the applicant is under the age of 18,
    - if the applicant has a disqualification following the revocation of their licence
    - if the applicant is not-resident in an EEA state,
    - if the applicant is a company not incorporated in an EEA state,
    - if the applicant has, within a period of 12 months immediately preceding the date when the application was made, been refused the grant or renewal of a licence for the premises, vehicle, vessel or stall in respect of which the applicant is made, unless the refusal has been reversed on appeal.
  - Refuse the application on the following discretionary grounds:
    - That the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reasons;
    - That if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person other than the applicant, who would be refused the grant, renewal or transfer of such a licence if he made the application himself;

- That the number or sex establishments or of sex establishments of a particular kind, in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality;
- That the grant of renewal of the licence would be inappropriate, having regard:
  - To the character of the relevant locality; or
  - To the use to which any premises in the vicinity are put or
  - To the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made

## 8.0 Recommendation

- 8.1 Members are asked to consider and determine the application in accordance with paragraph 7 above.
- 8.2 Furthermore Members are asked to approve the external appearance of the premises and all advertising material used including that upon any vehicle(s) to promote the business as set out at Appendix D.

## Appendices

- 9.1 Appendix A Copy of Application
- 9.2 Appendix B Exempt Information
- 9.3 Appendix C Additional documents supplied with application
- 9.4 Appendix D External appearance / advertising information
- 9.5 Appendix E Location map
- 9.6 Appendix F Objections received in time
- 9.7 Appendix G Objection received from Councillor Rebecca Charlwood
- 9.8 Appendix H Letters of Support received in time
- 9.9 Appendix I Standard Conditions

## 10.0 Background papers

- 10.1 Leeds City Council Licensing of Sex Establishments Statement of Licensing Policy.
- 10.2 Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009.



Sex Cinema

Entertainment Licensing, Leeds City Council, Civic Hall, Leeds, LS1 1UR

#### **Application For The Grant Of A Sex Establishment Licence**

Local Government (Miscellaneous Provisions) Act 1982 As Amended

#### Please read the following instructions

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

Sex Shop

Sexual Entertainment Venue

APF	PLICANT DETAILS						
1.	Is the applicant:						
	🗌 An individual	(please answer questions 2, 5 to 9)					
	🛛 A company or other corporate body	(please answer questions 3, 5 to 9)					
	A partnership or other unincorporated body	(please answer questions 4, 5 to 9)					
2.	Full name of applicant (individual):						
	Former or previous names:	·					
	Home address:						
	Post town:	Post code:					
	Telephone numbers:						
	Date of birth:	· ·					
3	Name of applicant (company name):						
	Red Carpet Leisure (Leeds) Limited	· · ·					
	Address of registered or principal office:						
	100 Roundhay Road						
	Post town: Leeds	Post code: LS8 5AN					
	Registration number: 07778292						
4.	Name and address of applicant:						
	Names and addresses of applicant's partners (p 2 9 M/	blease use additional sheet):					

5.	Are there any other persons responsible for the management of the premises/bus than the partners? Please state their names and addresses:	siness othe
	N/A	
6.	a. Has the applicant ever been known by any other name? Y	es 🗌 No 🛛
	b. Has the applicant ever been convicted of a criminal offence?	es 🗌 No 🕻
	c. Has the applicant ever been refused a sex establishment licence?	es 🗌 No [
	d. Has the applicant ever had a sex establishment licence revoked?	es 🗌 No [
	e. Has the applicant ever been served with a winding up petition? Y	es 🗌 No 🕻
	If the answer to any of these questions is yes, please provide details:	
7.	Applicants' trading address or head office (other than the premises)	
•	2 Sovereign Place Leeds LS1 4SP	
8.	Will the business for which this licence is sought be carried on for the benefit Y of a person other than the applicant?	es 🗌 No 🛛
	If the answer is yes, state the name, address, place of registration, registered numerial the identity of all directors, company secretary and those with a greater than 10% shareholding.	
9.	Does the applicant operate any other sex establishments, licensed or otherwise? state name, address, and type of sex establishment of each.	Please
	No (However Red Carpet Leisure North Limited – an associated company operates Silks Manchester in respect of which an SEV licence was granted from the 9 <sup>th</sup> January 2012)	

**B**<sup>C</sup>

e C

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11.	Silks						
11.							
	Is the premises a 🛛 Building 🗌 Vehicle 🗌 Vessel 🗌 Stall						
12.	Where is it proposed to use the vehicle, vessel or stall?						
	N/A						
13.	Does the company propose to only operate on the internet? (answer Q14 Yes No [ to 19 only)						
14.	Premises address						
	2 Sovereign Place						
	Post town Leeds Post code LS1 4SP						
	Telephone number at premises 0113 242 5302						
15.	Which part of the premises is to be used as a sex establishment?						
	Ground and First Floor						
16.	Is the applicant 🗌 owner 🖾 lessee 🗋 sub-lessee 🗋 other						
17.	If the applicant rents the property state:						
	a. Name and address of landlord						
	b. Name and address of the superior landlord:						
	N/A						

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	c. Total annual rental:		
	d. Length of unexpired term:		
	e. Notice required to terminate tenand	y: 6 months notice required from I	andlord
18.	· · · · · · · · · · · · · · · · · · ·	management company (if appropriate)	· · · · · · · · · · · · · · · · · · ·
10,	Please provide details of the building i	nanagement company (n'appropriate)	
19.	State the current use of the premises:		
	Gentieman's lounge		
20.	Has planning permission, or a certification the use of the proposed premises?	ite of lawful use, been obtained for	Yes 🗋 No [
	Please see attached Planning Perr	nission	
21.	Can members of the public access the	premises:	
	a. Directly from the street?		Yes 🖾 No
	b. From other premises?		Yes 🗌 No
	c. Not at all? (internet sales only)		Yes 🗌 No
22.	a. Numbers of door supervisors: Two	minimum	
	b. Hours door supervision in place:		
	When premises trade which is ger	nerally 9pm to 6am	
23.	Are the premises currently being used	as a sex establishment?	Yes 🛛 No
	Please provide details of the business	currently operating the business:	
	Red Carpet Leisure (Leeds) Limite	d - Applicant	
OPE	RATING SCHEDULE		
24.		/ please tick here 🔲 and continue to C	)26)
	Monday <b>21.00 – 06.00</b>	Friday <b>21.00 – 06.00</b>	- /
	Tuesday <b>21.00 – 06.00</b>	Saturday <b>21.00 – 06.00</b>	
	Wednesday <b>21.00 – 06.00</b>	Sunday <b>21.00 – 06.00</b>	
	Thursday <b>21.00</b> – <b>06.00</b>		
25.	Has the applicant entered into any wr with the business, for example a man agreement or profit share arrangement	agement agreement, partnership	Yes 🗌 No 🛛

a. Please provide details of any lender, mortgage or others providing finance:

b.	Please	provide	details	of	any	merchandising	agreements:
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Pre	mises management	
26.	Please state the name of the person who will be in day to day control of the p manager).	remises (the
	a. Will the manager be based at the premises	Yes 🛛 No 🗌
	b. Will the management of the premises be the manager's sole occupation	Yes 🛛 No 🗌
27.	Who will be in control of the premises in the manager's absence (relief manager's absence)	ger)?
	a. Will the relief manager be based at the premises in the absence of the manager?	Yes 🛛 No 🗌
	If you have ticked no to any of the above, please provide details	

CXU	ernal appearance and advertising
28.	Please describe the proposed exterior signage and advertising. Please include nature, content and size of each sign and any images to be used:
	Please see photographs attached of the existing signage which we intend to retain
	Please note that a drawing of the front elevation is required to be submitted with this application
29.	Please describe how the interior of the premises is obscured to passers by:
	It is impossible for persons to see inside – even when the front door is open as the view is to our reception counter only
30.	Please describe any proposed window displays:

31.	Please describe how the business is to be advertised, i.e. business cards, billboard advertising, personal solicitation, advertising on motor vehicles, radio or television advertising:
	Billboards; motor vehicles; business cards.
Poli	cies and Operating Schedule
32.	Please provide details of the age verification policy:
	Challenge 25 document attached
33.	Please provide details of the CCTV arrangements:
	Full details of camera location points both internal and external are shown on the plan accompanying this application
	There will be full compliance with Sections 37-40 of the Standard Conditions regarding CCTV
34.	State measures to be taken to prevent nuisance to residents and businesses in the vicinity:
	No interaction either with residents (none in vicinity) or businesses (which are generally closed by the time the venue opens)
35.	State measures to be taken to promote public safety:
	SIA registered door personnel, CCTV installation, Fire Alarm System
36.	State measures to be taken to prevent crime and disorder:
36.	State measures to be taken to prevent crime and disorder: SIA registered door personnel of which at least two will be present at all times the premises are open to the public.

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37.	State measures to be taken to protect children from harm:
	No admission to under 18 year olds
	Challenge 25 Policy
	Compliance with Standard Condition 18 regarding external signage
38.	State measures to ensure employees age and right to work in the UK:
	Thorough checks as per Agile.
	All employees personal details are checked prior to employment commencing.
	Personnel records are kept and retained at the premises.
	All dancers details are also thoroughly checked prior to being allowed access to the premises under status of self-employed persons.
<u>3</u> 9.	Describe training and welfare policies:
	Please see Training and Welfare Polices attached
•	We take the training and welfare of our staff seriously and ensure induction prior to employment commencing.
	For self-employed dancers we also care for their welfare.
Apr	lications for Sexual Entertainment Venues Only
	Is the proposal for full nudity? Yes 🖄 No
41.	Describe the nature of the entertainment, e.g. lap-dancing, pole dancing, stage strip-tease:
	Lap Dancing, Pole Dancing and Stage Strip Tease (First Floor)
42.	Lap Dancing, Pole Dancing and Stage Strip Tease (First Floor) Please enclose a copy of the code of practice entertainers must abide by (or equivalent document), and describe how entertainers will be monitored to ensure compliance:
42.	Please enclose a copy of the code of practice entertainers must abide by (or equivalent
42.	Please enclose a copy of the code of practice entertainers must abide by (or equivalent document), and describe how entertainers will be monitored to ensure compliance:
	Please enclose a copy of the code of practice entertainers must abide by (or equivalent document), and describe how entertainers will be monitored to ensure compliance: Performers must abide by all Standard Conditions
	Please enclose a copy of the code of practice entertainers must abide by (or equivalent document), and describe how entertainers will be monitored to ensure compliance: Performers must abide by all Standard Conditions See Code of Conduct for Dancers and Staff Please enclose a copy of the code of conduct customers must abide by (or equivalent
	Please enclose a copy of the code of practice entertainers must abide by (or equivalent document), and describe how entertainers will be monitored to ensure compliance:         Performers must abide by all Standard Conditions         See Code of Conduct for Dancers and Staff         Please enclose a copy of the code of conduct customers must abide by (or equivalent document), and describe how customers will be monitored to ensure compliance:

	regarding misbehaviour by staff/public who see the monitor and who are inf that all booths are equipped with cameras.	orme
	S.I.A. staff present at all times	
44.	Please enclose a copy of the welfare policy for performers (or equivalent document) a describe how this will be distributed.	nd
	See attached. The welfare Policy is handed to each performer who works at t venue. A further copy is on display in the dancer's changing room.	:he
45.	Does the business intend to provide vehicles to transport customers or $Yes \boxtimes Performers$ to and from the premises?	No 🗌
	Please enclose copies of the relevant licences issued by Taxi and Private Hire Licensing	g.
	See attached	
Fur	ther information	
46.	Please set out any further information you wish the authority to take into account.	
	Silks Manchester granted SEV and have traded under SEV conditions	
47.	Is there any information on this form you do not wish to be seen by members of the p If so state which information and the reasons why you do not wish it to be seen.	oublic?
	Νο	
CHE	CKLIST & ENCLOSURES	
	losures	
	ve made or enclosed payment of the fee	
	ve enclosed three sets of plans of the premises	
	ve enclosed a photograph of the street elevation of the premises	
	ve enclosed a completed form SES for each person mention in ()/ 4 5 and 8	- I X
	ve enclosed a completed form SE5 for each person mention in Q2, 4, 5 and 8	
I ha	ve enclosed a completed form SE5 for the Manager and Relief Manager (Q26 $\&$ 27)	$\boxtimes$
I ha I ha	ve enclosed a completed form SE5 for the Manager and Relief Manager (Q26 & 27) ve enclosed a copy of the company's staff welfare policy	$\boxtimes$
I ha I ha	ve enclosed a completed form SE5 for the Manager and Relief Manager (Q26 $\&$ 27)	$\boxtimes$

I have enclosed a copy of the Dancers Welfare Pack (if appropriate)

I have enclosed a copy of the licences for vehicles used in connection with the business (if appropriate).

## Advertisement

I declare that I have served a copy of this application on West Yorkshire Police and British  $\square$ 

 $\boxtimes$ 

 $\boxtimes$ 

Transport Police as a matter of courtesy

I declare that a public notice advertising this application has today been displayed upon the	$\boxtimes$
proposed premises where it may be conveniently read by the public and will remain	
thereon for a period of 21 days. A copy of the notice (SE6) and the standard declaration	
(SE7) is enclosed.	

I declare that within seven days of the date of this application a public notice advertising this application will be publicised in the legal notices column of the local press.

A copy of the relevant press edition will be forwarded to Entertainment Licensing

I understand that if I do not comply with the above requirements my application will be rejected

Leeds City Council is under a duty to protect the public funds it administers, and to this end may use the information you have provided on your application for the prevention and detection of fraud. It may also share this information with other bodies responsible for auditing or administering public funds for these purposes.

Any person who, in connection with an application for a grant, renewal or transfer of a sex establishment licence, makes a false statement which he knows to be false in any material respect of which he does not believe to be true is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000

## SIGNATURES

Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant please state in what capacity.

Signature	
Date	28-3-12
Capacity	Solicitars on belief of the Applicant
Contact Name application Kuits Steina 3 St Marys P	-
Post town Ma	nchester Post code M3 2RB
 Telephone nu	mber (if any) <b>0161 838 7888</b>

If you would prefer us to correspond with you by e-mail, your e-mail address (optional) **anthonylyons@kuits.com** 

#### Guidance Notes

1. Please return this completed application form to:

Entertainment Licensing Department
Civic Hall
LEEDS
LS1 1UR

- 2. Please make cheques/postal orders payable to Leeds City Council.
- 3. The fee for the grant of a new sex establishments is £2,800
- 4. The applicant is responsible for serving a copy of this application on the Licensing Officer, West Yorkshire Police, Millgarth Police Station, Millgarth Street, Leeds LS2 7HX.
- 5. Copies of this application may be forwarded to West Yorkshire Fire Service who will assess the application and inspect the premises, if necessary, to provide observations in relation to the structure, safety and suitability of the building for the purpose intended.

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- 6. Furthermore, details of this application will be forwarded to the local Ward Members.
- 7. Requirements for layout plan

The plan must show:

- 1. The layout of the premises including, e.g. stage, bars, cloakroom, WCs, performance area, dressing rooms.
- 2. The extent of the boundary of the premises outlined in red
- The extent of the public areas outlined in blue
   Uses of different areas in the premises, e.g. performance areas, reception, staff facilities.
- 5. Structures or objects (including furniture) which may impact on the ability of individuals to use exits or escape routed without impediment.
- Location of points of access to and egress from the premises.
   Any parts used in common with other premises.
   Position of CCTV cameras

- 9. Where the premises includes a stage or raised area, the location and height of each stage or area relative to the floor.
- 10. The location of any steps, stairs, elevators or lifts.
- 11. The location of any public conveniences, including disabled WCs.
- 12. The location and type of any fire safety and other safety equipment.
- 13. The location of the kitchen (if applicable).
- 14. The location of emergency exits.

For further assistance or information please contact Entertainment Licensing on 0113 247 4095





# SE5

Entertainment Licensing, Leeds City Council, Civic Hall, Leeds, LS1 1UR

#### **Information On Individuals**

Local Government (Miscellaneous Provisions) Act 1982 As Amended

#### Please read the following instructions

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

PER	PERSONAL DETAILS				
1.	Name:				
2.	Former name (if any):				
3.	Position in relation to applicant (i.e. director, partner, manager): MANA	GER			
4.	Date of Birth: 5. Gender: FEMALE	1			
5.	Permanent address:				
6.	If resident at this address for less than 3 years state previous address:	/			
7.	Have you been resident in the UK for longer than 6 months?	Yes 🗹 No 🗌			
8. Have you ever been disqualified from holding a sex establishment licence?					
	Please give details				
9.	Have you ever been involved in the management of a business, whether as a pr director, company secretary, partner, manager, supervisor or otherwise which h of the following types of licence refused, refused on renewal reviewed or revoke	as had any			
	a. Sex establishment licence	Yes 🗌 No 🛛			
	b. Licence for the supply of alcohol	Yes 🗌 No 🗹			
	c. Licence for the provision of entertainment, whether sexual or otherwise	Yes 🗌 No 🗹			
	d. Personal Licence under the Licensing Act 2003	Yes 🗌 No 🕅			
	Please give details:				

10.	Have you ever been convicted of a criminal offence, whether in the United Yes 🗋 No Kingdom or elsewhere?
	If so, provide details of the date, convicting court, offence and penalty imposed.
11.	To your knowledge, are you currently the subject of any criminal Yes No investigate?
	If so please give details
12.	Have you ever had civil legal action taken against you? Yes 🗌 No
	If so please give details
13.	
	Individual Voluntary Arrangement? $NO$ If so please give details
14.	Have you ever been disqualified from acting as a company director? Yes No
	If so please give details
15.	Is there any other information which you believe the licensing authority Yes No would reasonably expect notice of, or you would like to licensing authority to take into account when considering information you supplied?
	If so please give details
16.	Is there any information in this form which you do not wish to be seen by Yes No members of the public?
	If so state which information and the reasons why you do not wish it to be seen.
infor shar	ds City Council is under a duty to protect the public funds it administers, and to this end may use the rmation you have provided on your application for the prevention and detection of fraud. It may also re this information with other bodies responsible for auditing or administering public funds for these poses.
Anv	person who, in connection with an application for a grant, renewal or transfer of a sex establishment nce, makes a false statement which he knows to be false in any material respect of which he does not
licen	eve to be true is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000
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licen belie SIG	eve to be true is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000

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# SE5

Entertainment Licensing, Leeds City Council, Civic Hall, Leeds, LS1 1UR

#### **Information On Individuals**

Local Government (Miscellaneous Provisions) Act 1982 As Amended

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Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

PER	PERSONAL DETAILS				
1.	Name:				
2.	Former name (if any):				
3.	Position in relation to applicant (i.e. director, partner, manager):				
4.	Date of Birth: 5. Gender: MITLE				
5.	Permanent address:				
6.	If resident at this address for less than 3 years, state previous address:				
7.	Have you been resident in the UK for longer than 6 months?	Yes 🗄 No 🗌			
8.	Have you ever been disqualified from holding a sex establishment licence?				
ļ	Please give details				
9.	Have you ever been involved in the management of a business, whether as a director, company secretary, partner, manager, supervisor or otherwise which of the following types of licence refused, refused on renewal reviewed or revol	has had any			
	a. Sex establishment licence	Yes 🗌 No 🛃			
	b. Licence for the supply of alcohol	Yes 🗌 No 🔃			
	c. Licence for the provision of entertainment, whether sexual or otherwise	Yes 🗋 No 🚺			
	d. Personal Licence under the Licensing Act 2003	Yes 🗋 No 🚺			
	Please give details:				
1					

10.	Have you ever been convicted of a criminal offence, whether in the United Kingdom or elsewhere?	Yes 🗌 No 🛛
	If so, provide details of the date, convicting court, offence and penalty imposed	
11.	To your knowledge, are you currently the subject of any criminal investigate?	Yes 🗌 No 🕻
	If so please give details	
12.	Have you ever had civil legal action taken against you?	Yes 🗍 No 🗍
	If so please give details	
13.	Have you ever been declared bankrupt or entered into an arrangement with created individual Voluntary Arrangement?	editors or an
	If so please give details NO	
14.	Have you ever been disqualified from acting as a company director? If so please give details	Yes 🗌 No 🛛
15.	Is there any other information which you believe the licensing authority would reasonably expect notice of, or you would like to licensing authority to take into account when considering information you supplied? If so please give details	Yes 🗌 No [
16.	Is there any information in this form which you do not wish to be seen by members of the public? If so state which information and the reasons why you do not wish it to be seen	<b>Yes 🗌 No </b>
infor	s City Council is under a duty to protect the public funds it administers, and to this end m mation you have provided on your application for the prevention and detection of fraud. I e this information with other bodies responsible for auditing or administering public funds oses.	t may also for these
purp Any	person who, in connection with an application for a grant, renewal or transfer of a sex estat ce, makes a false statement which he knows to be false in any material respect of which he	lishment does not
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## Appendix A



# SE5

Entertainment Licensing, Leeds City Council, Civic Hall, Leeds, LS1 1UR

#### **Information On Individuals**

Local Government (Miscellaneous Provisions) Act 1982 As Amended

#### Please read the following instructions

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

PER	PERSONAL DETAILS					
1.	Name:					
2.	Former name (if any):					
3.	Position in relation to applicant (i.e. director, partner, manager):	OR				
4.	Date of Birth: 5. Gender: Female					
5.	Permanent address:					
6.	If resident at this address for less than 3 years, state previous address:					
7.	Have you been resident in the UK for longer than 6 months?	Yes No				
8.	8. Have you ever been disqualified from holding a sex establishment licence? Yes 🗌 N					
	Please give details					
9.	9. Have you ever been involved in the management of a business, whether as a proprietor, director, company secretary, partner, manager, supervisor or otherwise which has had ar of the following types of licence refused, refused on renewal reviewed or revoked?					
ļ	a. Sex establishment licence	Yes 🗌 No 🖉				
	b. Licence for the supply of alcohol	Yes 🗌 No 🖺				
	c. Licence for the provision of entertainment, whether sexual or otherwise	Yes 🗌 No 💋				
	d. Personal Licence under the Licensing Act 2003	Yes 🗌 No 🛛				
	Please give details:					

10.	
	Have you ever been convicted of a criminal offence, whether in the United Yes No Kingdom or elsewhere?
	If so, provide details of the date, convicting court, offence and penalty imposed.
11.	To your knowledge, are you currently the subject of any criminal Yes No
	If so please give details
12.	Have you ever had civil legal action taken against you? Yes 🗌 No 🖉
	If so please give details
13.	Have you ever been declared bankrupt or entered into an arrangement with creditors or an Individual Voluntary Arrangement?
	If so please give details
14.	Have you ever been disqualified from acting as a company director? Yes No
	If so please give details
15.	Is there any other information which you believe the licensing authority <b>Yes No</b> would reasonably expect notice of, or you would like to licensing authority to take into account when considering information you supplied?
	If so please give details
16.	Is there any information in this form which you do not wish to be seen by Yes No
	If so state which information and the reasons why you do not wish it to be seen.
	If so state which information and the reasons why you do not wish it to be seen.
infor shar	If so state which information and the reasons why you do not wish it to be seen.
infor share purp Any ( licen	Is City Council is under a duty to protect the public funds it administers, and to this end may use the mation you have provided on your application for the prevention and detection of fraud. It may also e this information with other bodies responsible for auditing or administering public funds for these
infor share purp Any i licen belie	Is City Council is under a duty to protect the public funds it administers, and to this end may use the mation you have provided on your application for the prevention and detection of fraud. It may also this information with other bodies responsible for auditing or administering public funds for these poses. person who, in connection with an application for a grant, renewal or transfer of a sex establishment tice, makes a false statement which he knows to be false in any material respect of which he does not
infor share purp Any licen belie SICI	Is City Council is under a duty to protect the public funds it administers, and to this end may use the mation you have provided on your application for the prevention and detection of fraud. It may also this information with other bodies responsible for auditing or administering public funds for these poses. person who, in connection with an application for a grant, renewal or transfer of a sex establishment ice, makes a false statement which he knows to be false in any material respect of which he does not eve to be true is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000

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# Appendix A



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Entertainment Licensing, Leeds City Council, Civic Hall, Leeds, LS1 1UR

#### **Information On Individuals**

Local Government (Miscellaneous Provisions) Act 1982 As Amended

### Please read the following instructions

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

	1 Nomer				
1.	Name:				
2.	Former name (if any):				
3.	Position in relation to applicant (i.e. director, partner, manager): Shakeholder				
4.	Date of Birth: 5. Gender: female				
5.	Permanent address:				
б.	If resident at this address for less than 3 years, state previous address:				
7.	Have you been resident in the UK for longer than 6 months? Yes	io 🗌			
8. Have you ever been disqualified from holding a sex establishment licence?					
	Please give details				
9.	Have you ever been involved in the management of a business, whether as a proprietor, director, company secretary, partner, manager, supervisor or otherwise which has had a of the following types of licence refused, refused on renewal reviewed or revoked?	ny			
	a. Sex establishment licence Yes 🗌 N	io 🛛			
	b. Licence for the supply of alcohol Yes 🗌 N				
	c. Licence for the provision of entertainment, whether sexual or otherwise $ extsf{Yes}$ [] N	10 2			
	d. Personal Licence under the Licensing Act 2003 Yes 🗌 N	10 1			
	Please give details:				

10.	Have you ever been convicted of a criminal offence, whether in the United Kingdom or elsewhere? If so, provide details of the date, convicting court, offence and penalty impose To your knowledge, are you currently the subject of any criminal	<b>Yes 🗌 No </b> ⁄
1.	To your knowledge, are you currently the subject of any criminal	ed.
11.		
	investigate?	Yes 🗌 No 🔎
	If so please give details	
12.	Have you ever had civil legal action taken against you?	Yes 🗍 No 🖉
	If so please give details	
13.	Have you ever been declared bankrupt or entered into an arrangement with c Individual Voluntary Arrangement?	reditors or an
	If so please give details	
14.	Have you ever been disqualified from acting as a company director?	Yes 🗌 No 💋
	If so please give details	
15.	Is there any other information which you believe the licensing authority would reasonably expect notice of, or you would like to licensing authority to take into account when considering information you supplied?	Yes 🗌 No 🛛
	If so please give details	
16.	Is there any information in this form which you do not wish to be seen by members of the public?	Yes 🗌 No 📝
	If so state which information and the reasons why you do not wish it to be se	en.
inforr share	s City Council is under a duty to protect the public funds it administers, and to this end mation you have provided on your application for the prevention and detection of fraud. It this information with other bodies responsible for auditing or administering public func- oses.	. It may also
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## Silks Gentlemen's Lounge

Dancers & Performers Welfare Policy

- Dancers and Performers shall be provided with secure and private changing facilities.
- Dancers and Performers shall be provided with private toilet/hand washing facilities.
- Dancers and Performers can deposit any valuables with the Management by way of a sealed/signed envelope, to be kept in the safe upon their arrival at the club and returned at the end of their shift.
- Each new Dancer and Performer will be given a full and detailed induction upon their commencement of employment at the club. This will include all club rules, codes of conduct, unit familiarity, fire evacuation procedures and health and safety. This will be documented by way of the Company Dancers/Performance contract.
- At the conclusion of a shift all performers will be provided with a company nominated taxi or escorted to their own transport by a member of security staff or management.
- Private booths must not be fully enclosed. There must be a clear sightline from outside the booth so that any performance of sexual entertainment can be directly monitored.
- There must be a minimum of one member of security staff and/or Management on any floor where a performance of sexual entertainment is taking place.



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## Appendix C

## Silks Gentlemen's Lounge

Code of Conduct for Dancers and Staff

Dancers safety is paramount within Silks and it is the care of the staff and management to ensure dancers safety at all times. At the end of the night if a lift has been organised earlier in the evening then a member of the door team is to escort the dancer to the exit to ensure she is picked up by her lift safely. If a lift has not been organised or a dancer has missed her train etc a member of staff is to wait inside the premises with the dancer until a lift is organised and waiting outside or until such time as her transport is due.

Duty Managers must print out the list of dancers who have pre booked to work by 20.00hrs. A copy is to be handed to the receptionist along with the cash float, and the guest list for the night in question. Only those dancers who have pre booked are allowed to work.

All dancers must sign in on entering the building.

Random searches of all personal belongings are to be made, in particular for drugs and alcohol, which is strictly forbidden to be brought in by dancers. Anything which is not permitted by Silks is to be confiscated and logged down in the office diary and also on the end of night managers log. This is to be carried out by at least two members of staff of which one is to be the manager on duty and the other must be a female member of staff.

Keep vigilant throughout the night as to any dancers who you suspect to be drinking excessively. Inform management who will speak to the person in question and if necessary inform the bar staff to stop serving them or maybe remove them from the public area for the rest of the evening.

Spouses and boyfriends of dancers are not permitted into the club whilst a dancer is working. Report any suspicions you may have about solicitation or prostitution to the management immediately. Silks will not tolerate any dancer leaving the club with customers. Dancers will be removed immediately upon suspicion of prostitution. A dancer is not to leave the club during a shift without exceptional reason.

Ensure when possible an eye is kept on the CCTV, especially in the dance booths. Customers must remain seated throughout the routine with their feet on the floor and their hands by their sides. The dancer is allowed minimal contact with the customer but the customer is not allowed to touch the dancer at any time. If extra money is seen to be given in the private boots by the customer the dancer should ensure the money is handed in at the pay booth. The dancer should also ensure that the customer is never left unattended downstairs at any time. It is also important to keep an eye on all the CCTV footage. Anything seen untoward throughout the entire club must be reported immediately to the door team and duty manager.

Dancers must use the appropriate smoking coats to access the smoking area located outside the main entrance.

Staff members are to ensure a booth number is allocated at the beginning of every dance for security purposes. Ensure a vigilant eye is kept on the timing of each dance. Ensure no furniture is moved within the dance booth, this includes sofas, lights, cameras, mirrors and cushions.

Dancers are to arrive and leave smart and in appropriate clothing. No provocative outfits are to be worn outside the premises.

There is to be no provocative dancing by the dancers anywhere in the club except for on the pole and in the private dance booths.

Dancers are not allowed to take regular customers into the upstairs V.I.P area.

Toilets are checked hourly for drugs. Please be vigilant when using the toilet area and any evidence of drug use is to be reported to the manager immediately.

Dancers are to do a routine on the pole twice a night. If a dancer asks you to play a particular song then please ensure you do so if possible.

After a dancer has been served at the bar they are requested to be seated around the main club area.

Be vigilant on how the dancers interact with our customers. Silks expects all dancers to show respect and be courteous to all staff members and dancers alike. Bullying and the use of foul language will not be tolerated.

If you witness any of the above please report immediately to the manager on duty. Do not deal with the situation yourself.

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## Appendix C



There is to be NO CONTACT between the customer and dancer whilst the dance routine is taking place. The customer is to remain fully clothed and seated with his/her hands placed by their sides at all times.

The customer is NOT PERMITTED to dance throughout the routine.

Any of the above seen to be taking place could result in your dance being terminated with no refund of money to the customer

By order of Silks Management

ENTERTAINMENT LICENSING

1 0 APR 2012



# RECEIVED

# **DANCERS BOOKINGS**

You must remember to confirm with reception your pre-booked dates as to when you will be working at Silks.

The cancellation policy is that if you fail to cancel up to 24 hours before hand £15.00 will be deducted from your subsequent attendance

Signed: The Management

# Appendix C



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### **DANCE TARIFF**

All Dances are priced at £10.00 per single dance

Silks charge 3% on all Credit/Debit card payments

Red Carpet Leisure Ltd • 2 Sovereign Place • Leeds • LS1 4SP t: 0113 242 5302 • w: silks-gentlemenslounge.co.uk • e: info@silks-gentlemenslounge.co.uk Page 50

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1 0 APR 2012



# RECEIVED

# **DANCERS NOTICE**

Should you wish to seek any Union Association

advice or guidance please contact:

GMB

**Grove Hall** 

60 College Grove Road

Wakefield

WF1 3RN

www.gmb.org.uk

www.dancersinfo.co.uk

# Appendix C

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# Red Carpet Leisure

# Silks Gentlemen's Lounge

Acting Professionally Giving Great Service Investing in our People and Places Leading by Example Energetic & Enthusiastic

I have read and fully understand the Agile Document.

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Date

Name

#### DUTIES

Your principle duties will be as notified by your Manager. Your will be expected to carry out such additional or alternative duties for the Company as is reasonably consistent with your position as the Company may from time to time reasonably require. Your job content may change from time to time according to the requirements of the Company, its business and the market in which we operate. The Company, therefore, reserves the right, upon reasonable notice, to require you to undertake alternative duties within any Department of the Unit which falls within your capabilities.

#### DEDUCTIONS

Any damage to or loss of stock/cash or property that is the result of your carelessness, negligence or by your wilful act or omission will render you liable to pay the full or part of the cost or repair or replacement. You have a duty to report to management, any damage to or loss of cash, stock, fixtures, or fittings or property. Any loss to the Company that is as a result of your failure to observe rules, procedures or instructions, or is as a result of your negligence or deliberate behaviour or your unsatisfactory standards of work will render you liable to reimburse the full or part of the cost of loss. We also reserve the right to take disciplinary action. In the event that we make a claim against our insurers, for repair or replacement or other losses incurred, we reserve the right to require you to pay any insurance excess that may accrue.

#### ABSENCE FROM WORK

You must obtain permission for any unavoidable absences from work, other than sickness form your Manager. Unauthorised absence is regarded as unacceptable and may result in disciplinary action.

First day of absence from work:

- Telephone the unit at the earliest possible opportunity (at least four hours) before your shift is due to commence.
- Where possible make the call yourself.
- Speak to the Manager or senior member of staff only and tell them the nature of your illness and when you expect to be able/fit to return to work.

Failure to follow agreed procedure may result in pay being withheld, and the disciplinary procedure being invoked. If you have not been signed off work by a Doctor you must continue to call in on a regular basis to keep the unit informed of your situation.

#### Annandiv

#### PERSONAL PROPERTY

The Company does not insure employees property and accepts no liability for the loss or damage to personal belongings lost or damaged during the course of your duty or whilst at work. You are advised to arrange your own insurance for your personal property. Do not being valuables or large sums of money into work with you.

#### COMPANY PROPERTY

You are personally responsible for all Company property including, but not limited to, money and/or stock which you may handle, and any uniform or protective clothing which is provided for your use. No items of Company property may be removed from the premises without authorisation from your Manager, even if such an item is apparently discarded or waste.

#### LOST PROPERTY

If you find or lose any property on the Company premises report it immediately to your Manager.

#### STAFF NOTICE BOARDS

There are provided to keep you informed and updated with what is going on within your units and the Company. We encourage you to read the notice board on a regular basis as it will be updated with things such as working conditions and social news. Nothing must be posted on the Staff Notice Board without the authorisation of your Manager.

#### PERSONAL RELATIONSHIPS

Should you enter into a relationship with a colleague, or other employee of the Company then you must ensure it is no way affects the way you perform your duties or carry out your responsibilities. Neither should the relationship have any adverse effect or influence on your dealings with others. It is important that at all times you conduct yourself in a thoroughly professional manner and do not allow any unseemly behaviour or conflict of interest to arise. Where such conflicts arise and it is deemed to have a negative impact on other or the interests of the business, we reserve the right to take the corrective action.

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#### **COMPANY TELEPHONES**

Our telephones are intended for business use only. Prior permission must be sought before making personal calls. Permission will only be considered if the call is of an urgent/essential nature.

#### DRESS CODE

Your appearance, personal hygiene and dress code is important to ensure we always portray a professional image. Where Company clothing is supplied this should be worn at all times whilst working. Your Manager will advise you of the dress code for your unit.

#### FRIENDS AND RELATIVES

We discourage friends and relatives from visiting you at work except in the case of emergency.

#### WEIGHTS AND MEASURES

For those whose position involves the service of products these must be served in their correct measures at all times. Failure to comply with these rules could result in you and the Company being fined. We will ensure that you received the correct training for the service of products. If at any time you are in doubt as to whether the Company or particular members of staff are complying with these legal requirements, you should raise the matter immediately with your Manager. You will be required to complete an "Authorisation to Sell Alcohol Form" as a condition of your employment. Breaches of legal requirements may result in disciplinary action being taken which could lead to termination of your employment.

Although this does not form part of current licensing legislation the Company operates the following measures:

- Wine must be sold in measures of 125ml or 175ml of multiples thereof.
- Spirits, by law, whisky, gin, rum and vodka must be sold in 25ml or 35ml measures or multiples thereof. A Government stamped thimble or optic should be used. Other spirits and liquor measures are governed by Company standards.

#### TILL AND CASH HANDLING

You will be notified of the procedures that must be applied when handling cash or dealing with other payments.

In all cases when you are working with a till you must always:

- Ring every transaction into the till.
- Keep the till draw closed between sales.

If there is a cash shortage on a till at which you alone have been working, you may be liable to make good that shortfall by deductions from your wages.

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#### CCTV

You are advised that CCTV equipment is present in all areas of our premises. AnY attempt to interfere with its operation will be considered to be a serious disciplinary matter.

#### CONFIDENTIALITY

It is imperative that you treat all information that may come to your knowledge in the course of your employment as confidential; this includes, but is not limited to:

- The Company
- The Units
- Employee information
- Customer contact details
- Electronic and paper format information.

Any wilful disregard will be treated as misconduct.

You must not disclose any trade secrets or other information of a confidential nature relating to the Company or any of its associated Companies or their business or in respect of which the Company owes an obligation of confidence to any third party during or after your employment except in the course of your employment or as required by law. You must not remove any documents or tangible items which belong to the Company or which contain any confidential information from the Company's premises at any time without proper advance authorisation. You must return to the Company upon request, and in any event, upon the termination of your employment, all documents or tangible items which are in your possession or under your control. You must if requested by the Company delete all confidential information from any re-usable material and destroy all other documents and

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tangible items which contain or refer to any confidential information and which are in your possession or under your control.

#### DATA PROTECTION

In the course of your work you may come into contact with and use confidential personal information about employees such as names, telephone numbers, addresses, next of kin and emergency contacts. The Company has a Data Protection Policy which helps to ensure that you do not breach the Data Protection Act 1988 which has strict rules in this area.

#### RANDOM CHECKS

We reserve the right to conduct random checks on your person, staff accommodation, property (including vehicles) whilst you are on our premises or engaged on out business. Where such random checks are conducted, care will be taken to ensure that a work colleague accompanies you at the time of the check. In such circumstances you will be asked to remove the contents of pockets, bags, parcels etc. The random aspect of such checks, by definition does not imply suspicion against the individual concerned. You may of course refuse to co-operate with a random check but this may be considered a breach of contract on your part. We reserve the option to involve the Police at any stage.

#### OTHER EMPLOYMENT

You must notify us of all other employment which you undertake. We will not allow any other employment which we deem to be either in direct competition or presents a conflict of interest with ourselves or our operation, but we will not object to any other employment provided it does not interfere with your ability to satisfactorily fulfil the job we employ you to do. This information is also required to ensure there is no infringement of the Working Time Regulations.

#### ACCIDENT REPORTING

If an employee suffers injury at work they must inform the Manager and ensure full details are entered on an Accident/Incident Form.

#### FIRST AIDERS

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The list of designated first aiders for your Company is on the staff notice board.

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#### FIRE PROCEDURES

Please ensure you make yourself familiar with the Fire Procedures for your Company. You will locate this on your staff notice board.

#### LICENSING LAW AND YOUR OBLIGATIONS

It is compulsory that every person selling an serving alcohol in licensed premises must be 'authorised' to do so either by the Designated Premises Supervisor or Personal Licence Holder before serving alcohol on your premises. If you are in any doubt then please ask your Manager or supervisor to check for you.

#### LICENSABLE ACTIVITIES

For a business to carry out the following activities a licence will be required. These include; sale of alcohol by retail, provision of regulated entertainment and late night refreshment.

#### **OBJECTIVES**

The four licensing objectives, all of which are of equal importance are as follows:

- The prevention of crime and disorder.
- Public Safety
- The protection of public nuisance
- The protection of children from hard.

If you suspect someone is under 18 years of age you must refuse to serve them. Then only acceptable forms of ID are those which have a photo and date of birth. There will be a passport or a new style driving licence.

It is also an offence to serve someone who appears to be or is already drunk.

It is illegal to sell intoxicating drinks to under 18'a, or another person on behalf of the under 18 year old. Prosecution for any of these offences could be made against the person serving the drink, the licensee, the under age customer and the customer, if not the under age person.

Police regularly check licensed premises for the sale of intoxicating drinks to under 18's by sending into the bar a young person who attempts to purchase an alcoholic drink. If you do sell an alcoholic drink to someone under the age of 18 you are liable for an "on the spot" fine. If this should happen inform your Manager immediately before accepting the fine.

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#### THINK 25

Silks has adopted the Challenge 25 Policy for dealing with proof of age. This requires you to request the customers to prove that they are over 18 years old, if you believe the customer is under the age of 25.

#### PASSING OFF/SUBSTITUTION

Passing off/substitution means to substitute one brand for another without the customer's knowledge. This is illegal. Passing off carries a fine of up to  $\pounds 2,000$  for both the person serving the drink and the Company.

#### **RIGHTS OF ENTRY AND INSPECTION**

The following individuals have the right to enter your premises:

- Police
- HM Revenue & Customs
- Licensing Authority
- Fire Authority
- Environmental Health Officers
- Health & Safety Executive

#### ALCOHOL AWARENESS

Alcohol may help your guests relax and enjoy themselves but there is always the danger of over indulgence. When this occurs the customer may become a danger to themselves or others. If you fee that someone has had too much to drink inform your Manager and door staff.

Some signs of intoxication are:

- Slurred speech
- Becoming loud and argumentative
- Loss of concentration and impaired thinking
- Becoming clumsy, spilling drinks and breaking glasses.

REMEMBER it is an offence to serve alcohol to someone who is drunk.

If a customer appears to be intoxicated:

- Inform them politely and discreetly that you cannot serve them anymore alcohol. Inform your Manager and door staff of the situation.
- Never get into an argument. If needed call your Manager or door staff.

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#### VIOLENCE

Violence can occur for numerous reasons and you may be exposed to it at some time during your employment. Violence may occur between customers or a customer may confront you or a member of staff. Arguments between customers can often be detected by changes in the atmosphere or mood. Warning signs to be alerted for are: sudden silences, a circle forming, people moving away, higher pitched voices, heads turning – watching and/or aggressive gestures/languages.

- Never deal with it yourself.
- Tell your Manager immediately and discreetly and door staff
- Keep calm

#### DRUGS

We operate a zero tolerance policy towards drugs. Drugs must never be allowed into licensed premises as:

- Your Company risks losing its licence
- It will negatively affect the business
- The possibility of violence occurring will increase.

You need to be alert to the probable use or supply of illegal drugs in your outlet.

Possible signs that drugs may be in your premises are:-

- Unusual smells
- Lack of co-ordination from your customers
- Irrelevant giggling
- Broken ends of cigarettes
- Folded wraps of paper, mirrors or razor blades
- Evidence of drugs on flat surfaces.

#### FIRST IMPRESSIONS

Greeting the customer, making eye contact and smiling are critical in making the customer feel welcomed and relaxed as soon as they walk through the door. Every customer should be acknowledged within seconds, even if you cant serve them immediately, with a friendly hello, or with whatever you feel comfortable with, bit don't forget to smile.

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#### Silks Gentlemen's Lounge

Flyering Code of Conduct

- 1. Only 2 Promotional Staff will be engaged in the distribution of flyers every Friday and Saturday night for a maximum of 5 hours each night.
- 2. Those staff must sign in with the Manager at the start of shift and the end of shift.
- 3. Staff are to wear their flyering badges at all times on their shift with it on show.
- 4. Take the dedicated mobile phone with them on the shift, and be contactable at all times for their own safety.
- 5. Only approach suitable members of the public who they think will use our flyers and come to the club.
- 6. Only hand out 1 flyer per person.
- 7. Ask the potential customers if they would like a flyer before handling the flyer to them.
- 8. Pick up any of their flyers they see on the floor while on shift.
- 9. Recycle as many flyers as they can.
- 10. Not to approach anyone they feel is under the influence of alcohol or drugs.
- 11. Not approach anyone they feel is behaving aggressively.
- 12. Use the Challenge 25 on anyone who looks under 25 and appears to look young to double check they are over 18 years of age.

#### Silks Gentlemen's Lounge

Hummer Drivers Code of Conduct

As a driver of clientele to the club you are key in ensuring the correct type of customers are selected. If basic checks are not undertaken then this could cause a flashpoint at the club door should a person be refused and potentially licence law or the licensing conditions will not be upheld or promoted.

Also drivers are promoting the business by their actions, so poor procedures or protocols will have a negative impact upon the business.

#### **Specific Controls**

- 1. All drivers will be responsible for completing the Drivers Daily Vehicles Report and submitting to Management at the end of each shift.
- 2. Drivers must never consume alcohol or drugs on or before duty. Failure to comply will result in immediate dismissal.
- 3. The Management have the right to randomly undertake driver checks to ensure they are capable of undertaking their duties.
- 4. Upon request drivers will permit alcohol and/or drug testing.
- 5. The delivery of a person to the venue does not guarantee entry and a sign to this effect will be maintained in each vehicle.
- 6. The Door Supervisor and Management will determine if a person complies with the admissions policy. This is not open for negotiation or questions by the driver.
- 7. Drivers will be considerate of traffic laws and the local community whilst in the field promoting the club.
- 8. Drivers will not 'pick up' clients who:-
  - Do not meet the dress code.
  - Can not pass Challenge 25 by the provision of adequate ID
  - Are drunk or drugged
  - Are barred or known troublemakers
  - Are argumentative or abusive.
- 9. Drivers must ensure that every person offered a shuttle to the venue are provided with a seat equipped with a seatbelt.
- 10. Drivers must be smart, positive and polite remembering that they are representing the club.
- 11. All members of staff regardless of employment status must show a duty of care to all persons (see below).



12. Drivers must adopt a partnership approach towards the authorities and comply with reasonable requests.

#### **Consideration of the local community**

Hummer drivers must consider the community within which they are working. An inconsiderate attitude towards parking, driving, littering, noise etc will simply damage the businesses reputation and bring the Hummers to the attention of the authorities.

- 1. Drive in a safe and responsible manner considering the other road users.
- 2. Park vehicles legally.
- 3. Never double park or cause an obstruction.
- 4. Never use your horn at night unless to legitimately warn other road users or pedestrians.
- 5. Take care when distributing flyers to ensure littering does not occur.
- 6. Build a positive relationship with the local authorities taking heed of any instructions or suggestion.

#### **Client Selection**

Inviting the correct type of customer to the venue is crucial as failure to do so may leave the venue in potential contravention of licensing laws or may cause a flashpoint between the customer and the Door Supervisors or Management.

#### **Dress Code**

The venue operates a smart casual dress code policy. A dirty or scruffy appearance as well as tracksuits will not be permitted.

Drivers must consider:-

- 1. Is this the type of person we want in our business?
- 2. Will they spoil another's enjoyable experience in a safe environment?
- 3. Are they clean?
- 4. Does the person's dress portray a certain type of person like a 'face' or gang member.

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Drivers must talk to any potential customers to establish if they are suitable for admission to the premises.

You **MUST NOT** under any circumstances park or stop your vehicles on foot paths or double yellow lines.

Any drivers not adhering to any of the above will be disciplined and as a result a suspension or the possibility of their employment being terminated.

I have read these rules and agree to adhere by them.

Sign.....

Print Name.....

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Date.....

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**Reception Check List** 

It is the responsibility of reception staff to ensure:

- The reception area and cloakrooms are clean and clutter free.
- Necessary paperwork is in place ready for opening.
- Collection of your float from management.
- Walkie Talkies are on the correct channel.
- You get the land line and mobile phone from the office before the start of your shift.
- A close eye is kept on the CCTV monitors and alert management or door staff to anything untoward on them.
- All staff and dancers sign in and out.
- There are no more that two dancers outside at any one time in the appropriate "smoking" coats.
- Dancers put all coats back where they belong.
- No customers to go into the club with a bag. Provide customers with ticket and keep their bag behind reception. Coats are to be hung up in the designated cloakroom.
- All phone calls are answered in a polite and professional manner ensuring you obtain all the correct information from the person calling e.g:- name, number, location and how many people to be picked up and make sure all this information is logged in the diary.
- All your calculations are correct at the end of the night.
- The reception area is left clean and tidy.
- The mobile phone and walkie talkies are put back on charge at the end of shift.
- You put the bin outside the reception door at the end of each shift.

The person on reception is the first person the customer meets when entering the club, therefore it is important that you remain vigilant at all times and act in a professional manner. Management will not tolerate staff on reception reading books/magazines, playing on their mobile phones, eating in the reception area etc.

Sign.....

Date.....



Dance Booth Nightly Check List

It is the responsibility of booth attendants to ensure:

- The booth is clean and tidy.
- All dance cards are in the correct compartment
- All necessary paperwork is in place ready for use on opening.
- Walkie talkies are on correct channel.
- Card terminals have charge.
- A close eye is kept on CCTV monitors throughout the shift and report anything untoward or suspicious to the doormen/manager.
- You check all money with the detector.
- You mark down every £100.00 on the top of the dance sheet in the form of a tally mark and put every £100.00 into the drop safe.
- You write down every dance on both the log sheet and in the times book.
- A disclaimer notice is written out completed with the customers signature for credit card transactions of £247.20 or more.
- All white copies of the dancers receipts are signed by the dancer before any money is given.
- You take your time and all calculations are correct on the dance sheet at the end of the night.
- You are polite and professional at all times to the customer.
- You leave the booth clean and tidy ensuring you put the bin outside the booth at the end of every shift and take all glasses back to the bar.
- Walkie talkies and card terminals are put on charge at the end of each shift.

The booth is an important part of the smooth running of the club and therefore full concentration is essential at all times throughout your shift. Management will not tolerate any staff bringing magazines, books etc into work. Your mobile phone is to be kept in a safe place such as your bag and to only be used on break times. Any breach of the above will result in disciplinary action being taken against you.

Sign.....

Date.....





# Appendix C



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**CCTV** Camera's Leeds

Upstairs Main Area's

- 1 On Spiral Staircase
- 1 on Bar
- 1 V.I.P Area
- 1 On Way to Public Toilets
- 3 in Main Lounge Area

1 Reception Area Onto Front Door

13 Dance Booths

2 Outside on Front Entrancee

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# SIKS gentlemen's lounge

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#### Downstairs camera

#### To view

Menu Enter – this logs you in Enter Then press escape – this will now allow you to search. Press play Search by time Adjust the date + time to required Press play To finish press stop Then '+' below the 2/goto Check red lights recording again To go to a single screen use the '+' & '-' buttons below the x2/goto

#### To record

Menu Enter – to log in Enter Go to back up device in the menu Enter Put in USB Enter – to connect it Come out of it all by pressing menu Press play Search by time Enter Input start time Press copy button - on under record Select camera numbers required Set the end time Press copy button again - one under record Will now copy to

31 days viewing on camera's.

# Siks gentlemen's lounge

#### **Upstairs** Camera

To view Menu Go down to search Enter – Square button in middle of circle Time search – enter, enter Adjust time & date Press menu Go down to search Enter To come out press stop

#### To Record

Press stop Input password (all 9's) Go to menu Go down to search Enter Go to back up Enter Enter Adjust start/finish times (Press menu to go from start to finish times) Then press menu Go down to back up to USB – Press enter

31 days viewing on cameras

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# Appendix C

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### **BAR TARIFF**

All Bottled Beers	£4.50
All Single Measure Spirits – Bottom Shelf	£4.50
All Single Measure Spirits – Top Shelf	£5.50
Soft drinks by the glass	£2.00
Energy Drinks by the can	£2.50
Wine by the glass – 175ml (125ml measures are available)	£4.50
Water by the glass	Free of Charge

Champagne Prices – Please refer to Champagne Tariff

situated on the bar

Silks charge 3% on all Credit/Debit card payments

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# Appendix C



# **CHANGING ROOM NOTICE**

TO ENSURE THE SAFETY OF ALL DANCERS working within

Silks – Please arrange to be collected at the end of your

working shift.

Alternatively, a taxi should be booked in advance, this can be

done by a Member of Reception Staff upon request.

Silks recommends that Dancers leave the venue in groups of two or more for added safety.

If you have any concerns, do not hesitate to speak to Silks

Management

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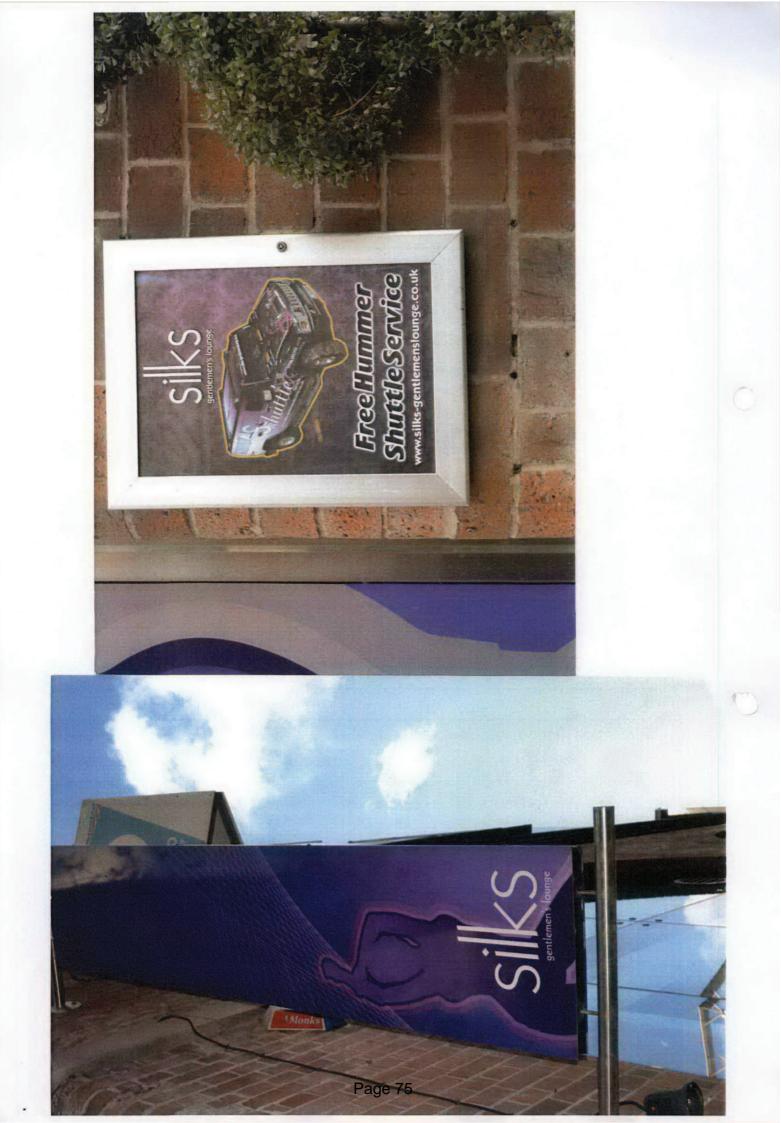
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## Appendix D













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Appendix E

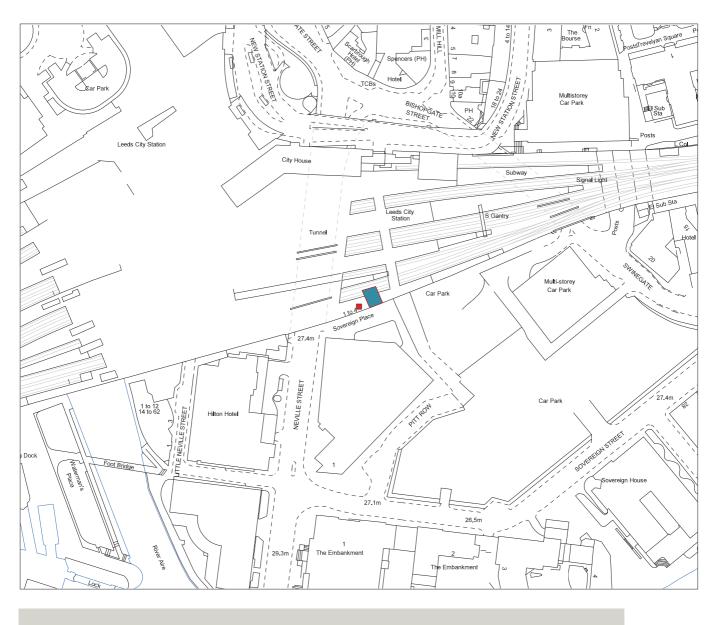


Leeds City Council

**Entertainment Licensing** 

# SX/SEV/00012/12/01

#### Silks, 2 Sovereign Place, Leeds, LS1 4SP



Km 0.025 0.05 0.075 0.1 0.125 0.15 0.175 0.2 0.225 0.25 0.275 0.3

This map is based upon the Ordnance Survey's Digital Data with the Permission of the Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office

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 Date:
 17 May 2012

 Scale:
 1:2000

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Appendix F





#### Licensing Committee

#### Re: Objecting to the re-licensing of 8 lap dancing clubs in Leeds

We the undersigned are concerned about the collective damage done to society by the continued proliferation of the lap dancing industry.

We note that Leeds City Council have decided to consider each license on a case by case basis when other cities have set a cap on the number of lap dancing clubs or imposed strict restrictions on the character of the locality that they can operate within.

In light of this we ask that the licensing committee use their discretionary powers when considering all eight clubs to:

• Significantly reduce the number of clubs (by at least half) in operation in Leeds and set a low limit on the number allowed in the city.

OR

• Refuse all applications and set a nil limit for the future.

#### Where they do exist they should not be:

- 1. Located on or be visible from main thoroughfares, main shopping streets or community spaces.
- 2. Located near civic buildings or places of worship.
- 3. Able to tout, offer lifts to or advertise their clubs using cars or women as promotional tools.

#### This is so that:

- 1. Leeds can be experienced during the day by residents and visitors without encountering a lap dancing club.
- 2. Civic celebrations and memorial services can take place without lap dancing clubs in the background.
- 3. At night the sex industry does not dominate the character of the city.
- 4. People in Leeds are safeguarded from the effects of the sex industry.
- 5. People can easily avoid the sex industry if they wish to.
- 6. The licensed sex industry where it operates does so in a discreet manner.

We welcome the new powers available to Local Authorities and call upon Leeds City Council to use them to make the city of Leeds a healthier place for all residents.

Yours Faithfully,

From: Atha, Cllr Bernard

Sent: 30 March 2012 21:34

То:

Cc: Labour Members

Subject: RE: Sexual Establishment Licence applications

Dear

Thank so much for replying so promptly. I apologise for bothering you as no sooner had I sent my e mail than I received a fairly comprehensive document which answered all my questions but one. One question does remain and that is as follows. Moral judgements are excluded as valid objections. Is this a local decision or is it in legislation of some kind?.

I am extremely hostile to such establishments as are in question as they debase the role of women and men's attitudes to them and excite the baser instincts of men in a corrupting manner. That is why I think moral judgements should be valid if not proscribed by legislation.

Kind regards and my thanks

Bernard

Cllr B P Atha

From: Macniven, Cllr Christine

Sent: 02 April 2012 14:05

To: Entertainment Licensing

Subject: RE: Sexual Establishment Licence applications

I object to the licensing of all of these clubs. Wellington St and York Place are in the heart of the business community and the presence of such establishments will detract from the nature of the area. My objection to Headrow and New Briggate hosting such clubs is on the grounds that their high visibility will be offensive to the population of the city and children and young people in particular. Christine Macniven

From: Sent: To: Subject: Maqsood, Cllr Kamila 30 March 2012 14:41 Entertainment Licensing Sexual establishment license

Dear Sir/Madam,

I wish to express my objection for the above application. I believe that these premises are morally wrong. This is exploitation of women.

Regards

Cllr Kamila Maqsood

Sent from my iPhone

02 April 2012 16:02

#### Subject: FW: Sexual Establishment Licence applications

Hi

I am raising an objection on two grounds to the application/s, for the consideration of the licensing panel.

Firstly, could you confirm whether under the discretionary grounds for refusal section (c), has the Local Authority set a limit on the number of such establishments that is permissible in a particular locality?

#### (c) The number of sex establishments, or sex establishments of a particular kind, in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality;

I am raising this objection not in relation to a particular establishment at this stage, but the prospect of **6** sexual entertainment venues in a 2 square mile radius area. It is worth noting that the applicants "Purple Door" and "Liberte" are 5 doors away on the same street.

Secondly in relation to "Purple Door" and "Liberte", these will be in a conservation area in the city centre and I am objecting under (di) and (dii) below.

#### (d) The grant would in inappropriate, having regard -

(i) to the character of the relevant locality;
(ii) to the use of which any premises in the vicinity are put;
(iii) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

Kind regards



Page 1 of 4

Appendix F

From: Leeds Object [leedsobject@rocketmail.com]

**Sent:** 24 April 2012 22:00

To: Entertainment Licensing

Subject: Objection to SEV application - Silks

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

# We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of

influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

Object has worked with women who have been affected by lap-dancing clubs and their role within the sex industry, below are extracts from their testimonials; the full accounts can be read at <u>http://www.object.org.uk/lapdancing-testimonies</u>

#### Lap-dancing fuelling demand prostitution:

"There was a clear link between the lap-dancing clubs and the brothels, although not formal. It is known that taxi drivers (including licensed black cabs) can receive commission for taking groups of men to lap-dancing clubs. However there were also minicabs that would then pick up punters from the lap-dancing clubs and bring them to the sauna. They would receive about £20 from the maid for bringing a group of men". *Liane* 

#### Experience of a young woman encouraged to audition for 'easy money':

"I had never thought about the effect of lap dancing clubs or the sex industry before this always thinking these women had the power etc. My one small encounter with that culture made me realise what foul places they really are and I am ashamed of myself for being sucked into what I see as 'sexual propaganda' which surrounds the industry". *Tina* 

#### Experience on women working as lap dancers:

"The management in all the clubs treated the girls very badly, they were discriminatory, frequently derogatory in their comments to and about the girls, they routinely practised favouritism, among the girls who were the high earners, and certainly purposely perpetrated an atmosphere, of intense competition between the girls, it was certainly meant to intimidate us and divide us. The management in all the clubs routinely put on too many girls on a night, so there was intense competition between the girls for the customers. The customers' attitudes varied between politeness to downright hostility and abuse." *Alexandra* 

"[The industry is seen as] a dream built on a myth that you can become famous, rich etc., it is perceived as being glamourous, and particularly due to the success of celebrated topless models like Jordan (Katie Price), girls and young women perceive this as being a stepping stone onto greater things, however, for every Jordan there are millions of girls who will never become famous, and will either: go into prostitution as they get older or give up the industry and do something else, but be emotionally and even physically damaged by the industry. The industry by its very nature is highly discriminatory and ageist, it is a certain fact that men want to see nubile young women naked, not 40 year old women, so the very core of the industry is extremely derogatory, and degrading to women of all ages." *Alexandra* 

"I don't know any where you get paid a wage. It varies but you have to pay what's called a house fee. You pay club £10 up to £80 for being there. That's not for doing anything. You give them that up front. Then they take a percentage of what you earn. It varies depending on what you earn. 10% if you don't do very well, or 25% if you have a good night. If the managers see you having a good night, they bump up the commission level. Lots of people would lie so they wouldn't have to pay. [there are] lots of hidden costs they don't tell you about." *Sarah* 

"You have a code of conduct but it's not adhered to too much. It's just to placate the local authorities. We weren't even encouraged to read it. You just sign it quickly. I was worried about signing it – but it became apparent it was all nonsense." *Sarah* 

The final quote for 'Sarah' heightens our concerns that the welfare pack, proposed with the new licensing' will become nothing more than a lip service to Leeds City Council and will not achieve its aim in protecting the women who work within this industry.

Further concern for the women within this industry is highlighted in the following article which appeared in the Yorkshire Post on April 12th 2012:

#### Lapdancers bare brunt of economic downturn

Lapdancers no longer need dancing skills, because club owners prefer women who are better at "hustling" for private dances rather than performing, a study suggests. Owners have compensated for falling profits in the economic downturn by demanding more money from their performers, according to researchers Dr Teela Sanders and Dr Kate Hardy from the University of Leeds. They told the British Sociological Association's annual conference yesterday that club owners had also increased the fees women pay to have the opportunity to dance, in order to remain buoyant. The researchers said: "It was unnecessary to have any dancing skills whatsoever, let alone the ability to do athletic tricks on the pole. The core skill necessary shifted from performance to hustling for private dances." Dr Sanders and Dr Hardy surveyed 197 dancers, interviewed 35 women and visited 20 strip clubs and pubs in the largest research project of its kind into the strip club industry in the UK. One dancer complained about what she said was a fall in standards. She told the researchers: "You'd see some girl who wasn't very pretty, couldn't dance, had a crap outfit, making a lot more money than you because she was there to make money, not to enjoy herself and be creative, so she would be pushier."

Please note we are happy for organisational anonymity to be waived so that the objection

can be recognised as having come from Object Leeds.

Regards, Leeds Object

[i] RTPI (2007) Gender and Spatial Planning – RTPI Good Practice Note 7 London: RTPI
[ii] LGA (2012) LGA survey - Strip clubs and bookies are hitting economic growth London: LGA
[available online at http://www.local.gov.uk/web/guest/media-releases/-/journal\_content/56/10161/3592279/NEWS-TEMPLATE]

Appendix F



Leeds City Council Licensing Committee Leeds Civic Hall Leeds LS1 1UR 9<sup>th</sup> April 2012

Dear Sirs,

We object to the licensing of the following establishments Red Leopard, The Headrow Silks, Sovereign Place Wild Cats, The Headrow Deep Blue, Wellington St Purple Door, York Place Liberte, York Place Black Diamond Club, New Briggate.

We must be clear that we object to all Lap Dance Clubs per se. They promote the sexual harassment of women. In traditional strip clubs women are objectified by having to strip for men for money. But in these lap dance clubs because of their peculiar rules women even have to solicit men to get them to pay for them to strip for them. Like prostitution, or licensed rape.

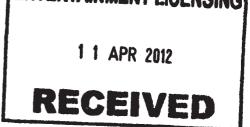
Men shout abuse at women and then obtain gratification by paying women to strip naked for them. It is violence against women. It is sexual harassment of women. Legitimised. Of course this encourages men to treat all women in this way once they some out on the street.

When clubs are licensed for this sex entertainment right in the centre of our city it says clearly that Leeds approves of this. We object particularly to Lap Dance Clubs on the Headrow in the centre of our city, opposite the Town Hall and the Library. Whatever else you do please close Red Leopard and Wild Cats and make the centre of our city safer for women.

Yours faithfully

We wish to object to the licensing of the following sex ENTERTAINMENT LICENSING

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate



SARSVL wishes to object to the licensing of all these sex establishments - see below. We particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed. It is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it.....The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey).....into a potentially upsetting, disturbing and often threatening experience." **Rape Crisis England & Wales** 

SARSVL does not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

#### The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to .....eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (Eden, 2003). These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lapdancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26%

Appendix F

of people believe that an inappropriately dressed woman is 'asking for it' (Amnesty/ICM, 2005). The numbers of reported rapes around lap dancing clubs is three times the national average (Eden, 2003).

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

At SARSVL we deal with the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (Vision for Leeds 2011-2030).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much

student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

SARSVL is currently looking for premises in the city centre and has rejected one option because of its close proximity to a lap-dancing club. We cannot expect women to run the gauntlet of the harassment and intimidation created by these clubs in an attempt to access or deliver our services.

References:

EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves

EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London

Support After Rape and Sexual Harassment Leeds (SARSVL) c/o Voluntary Action Leeds 34 Lupton St. Leeds LS10 2QW



#### Objection to Silks Lap Dancing Club's Application for an SEV Licence

I wish to register my objection to Silks Lap Dancing Club receiving a Sexual Entertainment Venue licence, reference SX/SEV/00012/12/01. Could you please confirm that this has been received within the consultation period?

I would like this application to be refused on the grounds of:

- location, including premises in the vicinity
- the character of the club's locality
- issues that could arise from the location
- the number of clubs already in Leeds

#### I also have concerns that these clubs degrade women and the men who use them and are a blot on the city of Leeds.

Silks is located south of the city centre, just past the Dark Arches. This area has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as part of Leeds where they feel vulnerable. The location of the club perpetuates this, as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city and state specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable."

Just past the entrance to Sovereign Place, where Silks is located, are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability, prey to groups of men entering or leaving the club and making comments and obscene gestures, which sometimes go further. During the 2011 all-women Reclaim The Night march, in which I participated, I heard and saw men in this area shouting sexual abuse and making obscene gestures at women on the march, and know that one woman was sexually assaulted (groped in a violent manner) which upset her very much. The presence of these clubs, and the way in which they use women as sexual objects for men's gratification, encourages some men to view all young women as existing only for sex and for men's use.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a mile's walking distance from Silks. The nearest are only 0.5 miles away, the furthest only 0.7 miles away. This saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city-centre-wide no-go area for women.

Recent research from the Local Government Association[ii] identifies that 72% of council officers believe that clustering of lap dancing clubs is damaging the local economy.

I therefore request that the application is denied.

#### If the application is granted please make it subject to the following:

I understand that all advertisements must be approved by the council. Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited. If they are allowed, I request that they display no images of women or the female form including silhouette or disguised as an animal (!).

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club, should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. I request that discarded flyers be collected by the clubs before the morning commuters arrive in the city centres and that these flyers not include images of women or the female form including silhouette or disguised as an animal.

I understand that Condition 18 "The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours" was removed at consultation due to the objection that it would be "virtually impossible to control, especially with the advent of cameras on mobile phones." I challenge this due to concerns for dancers' welfare. I believe that allowing photography in lap dancing clubs will allow for pornographic images to be taken of that women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. **Many other establishments** (designer shops / art galleries / music venues) have photography bans, and I see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

Condition 23 "Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm." I request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (such as fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as they would no longer have the protection of the security staff. I would like free taxi rides home – in a licensed black cab, not a private mini-cab - to be included in conditions, again with dancers' welfare in mind.

I would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### **Further comments**

I entirely agree with the stand taken by some MPs, councillors and members of religious and voluntary organisations publicised in the Yorkshire Evening Post this week. I believe that lap dancing clubs are degrading and dangerous for the women who work in them. I have talked to women, including students, who have started off as lap-dancers, attracted by apparently high salaries, and found that they are regularly propositioned for full sex and expected to do more than dance. Their self-esteem dwindles and they turn to alcohol and drugs as a way of dealing with the job. As addiction sets in they become unreliable and are eventually sacked, and then turn to street prostitution with all the horrors that brings. The organisation Genesis has confirmed that they are seeing an increasing number of university-educated women working as street prostitutes and this has been also reported in the Yorkshire Evening Post. Lap-dancing clubs are the route. Treating women as bits of meat for some men's pleasure is not acceptable.

Businesswomen report that social events are held at lap-dancing clubs and this makes them feel very uncomfortable. They do not feel taken seriously as professional women and think that the effect on some men is to confirm them in sexist and objectifying behaviour as if this is OK and the norm.

I am proud to live in the great city of Leeds and do not think it should be a haven for clubs which degrade women and in fact also the men who patronise them. There are better ways to attract visitors to our city centre and better ways for people to enjoy themselves.

Yours



Appendix F

10

From: Sent: To: Subject:

26 April 2012 20:27 Entertainment Licensing licensing objection

High

#### Importance:

Dear Leeds licensing department,

I wish to object to the licensing of the following sex establishments

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate

I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed in the first place, it is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do so. I used to work as a Library Manager at the Central Library and would often work into the eveing. I felt very unsafe coming out of work in proximity to these places.

I also want it on record that several of my male colleagues at the university have reported to me that the cars created to freely transport people to Silks (in particular) but also other sex establishments have stopped for them without their signalling and offered to pick them up to take them to Silks (and other sex establishments). I believe this kind of soliciting is not in the legal agreements under which these cars operate.

I would also like to mention that recently a reclaim the night march took place in the city and one of the women involved was sexually assulted in the city centre while others watched. This goes to indicate that there is a pervasive attitude in Leeds city centre that makes sexualised violence against women acceptable.

Further more I am disgusted that Leeds as a city that is forward looking would allow licenses to so many sex establishments in such a small area. It sends a very particular message about the type of city we want to be and the type of visitor we want to attract. However, I would argue that the vast majority of people in Leeds find it humiliating that their council seems set on creating a sexualized and exploitative environment. I have written to my local counsellor and my MP on this matter and I would urge you if not to act on my objection here today then to act upon the concerns they have expressed to me in response to my letters.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it...The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey)... into a potentially upsetting, disturbing and often threatening experience." Rape Crisis England & Wales

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to ... eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (Eden, 2003).

These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lapdancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26% of people believe that an inappropriately dressed woman is 'asking for it' (Amnesty/ICM, 2005). The numbers of reported rapes around lap dancing clubs is three times the national average (Eden, 2003).

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

Support After Rape & Sexual Violence Leeds (SARSVL) deals with the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Their advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (Vision for Leeds 2011-2030).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

SARSVL is currently looking for premises in the city centre and has rejected one option because of its close proximity to a lap-dancing club. We cannot expect women to run the gauntlet of the harassment and intimidation created by these clubs in an attempt to access or deliver SARSVL's services.

References: EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London

Yours Sincerely,



Appendix F

Leeds City Council Licensing Committee Leeds Civic Hall Leeds LS1 1UR 16<sup>th</sup> April 2012

Dear Sirs,

I object to the licensing of the following establishments

Red Leopard, The Headrow Silks, Sovereign Place Wild Cats, The Headrow Deep Blue, Wellington St **Purple Door, York Place** Liberte, York Place Black Diamond Club, New Briggate.

I must be clear that I object to all Lap Dance Clubs per se. They promote the sexual harassment of women. In traditional strip clubs women are objectified by having to strip for men for money. But in these lap dance clubs because of their peculiar rules women even have to solicit men to get them to pay for them to strip for them. Like prostitution, or licensed rape.

Men shout abuse at women and then obtain gratification by paying women to strip naked for them. It is violence against women. It is sexual harassment of women. Legitimised. Of course this encourages men to treat all women in this way once they are out on the street.

When clubs are licensed for this sex entertainment right in the centre of our city it says clearly that Leeds approves of this. I/we object particularly to Lap Dance Clubs on the Headrow in the centre of our city, opposite the Town Hall and the Library. Whatever else you do please close Red Leopard and Wild Cats and make the centre of our city safer for women.

Yours faithfully



12

From: **Sent:** 13 April 2012 22:29

To: Entertainment Licensing

Subject: Objection to SEV Applications

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licences for the following establishments and please can you confirm that this has been received within the consultation period for each:

- Red Leopard, The Headrow
- Silks, Sovereign St
- Wild Cats, The Headrow
- Deep Blue, Wellington St
- Purple Pool, York Place
- Liberte, York Place
- Black Diamond Club, New Briggate

I write to request the above applications are refused for the reasons outlined below.

Based on my personal experiences on a daily basis I particularly object to the licensing of sex establishments on the Headrow opposite the Town Hall and Main Library, specifically Red Leopard and Wild Cats. I work in Leeds City Centre and am committed to using public transport for my journeys to and from work rather than my own personal transport that would add to conjestion within the City. The bus stop I use for my journey back from work is on the Headrow, opposite the Art Gallery and very close to the two clubs in question. I work long hours and will often finish quite late and will need to get the bus home anywhere between 6pm and 8pm. If I choose to go to the gym after work, I may get the bus home up to 9pm. During the Spring, Autumn and Winter months this journey also tends to be in the dark.

I often find the proximity to these clubs during my evening wait at the bus stop intimidating. There will be groups of customers going to/from the club who are partaking in activities that serve to objectify women, and as a lone woman this can make me feel unsafe. In addition, a lot of these clubs will use their own promotional transport to taxi groups and individuals free of charge to their clubs. These tend to have blacked-out windows, and whilst I'm sure their justification is for the discretion of their customers, I find these vehicles intimidating and unsettling driving around the city and pulling up to the individual clubs.

Particularly, I feel this area of the city centre has been designed as a cultural centre with the Town Hall, Central Library, Art Gallery, Millennium Square and The Light. The inclusion of these clubs degrades this, and I feel prevents the potential of the area being realised. The Art Gallery has late opening hours, which would be an ideal evening activity for individuals, groups and families, but the presence of these clubs is off-putting and prevents the later visits being maximised. If as a city we wish to encourage citizens, and in particular our young people, to participate fully in the cultural life of the city then I see these clubs, and all throughout the city, as a massive barrier. Where they are not a barrier to individuals participating, they give a terrible message about violence against women and women as sex objects being condoned right in the heart of our city.

These clubs should never have been allowed in the first place, it is an insult and makes the very centre of our city unsafe. I would however, accept that the decisions to originally grant these licences were made in very different times. We are now in a very different economic climate,

and have to work much harder to protect the economy of our city, and the lives of citizens who choose to live here. Economically speaking, Leeds city centre has a lot to offer visitors, shoppers and businesses alike. Continued investment and commitment is now required more than ever to secure the future of the city for our young people. I feel that the presence of these clubs, and so many of them within close proximity to one another, cheapens the city centre both in terms of appearance and as a reflection of the values of the city. We should strive to be progressive and present our city as forward-thinking; as a city who values and protects all women and men who chose to live or visit here.

Kind regards,

Appendix F

From:

Sent: 25 April 2012 19:47

To: Entertainment Licensing

Subject: SX/SEV/00012/12/01

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

## We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

#### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

I am a woman that no longer feels safe to walk in these areas but I have even greater concern for the future and our daughters growing up in a world where woman are objectified to a greater degree than when I was growing up.

Regards,

4

#### From:

Sent: 10 April 2012 11:37

To: Entertainment Licensing

Subject: lap dancing clubs

I would like all applications for lap dancing clubs to be refused as licensing provides public recognition and through that acceptance of the demeaning of women as a legitimate form of entertainment. As well as demeaning entertainment, lap dancing clubs are closely associated with prostitution neither of which I would not like to see encouraged.

I hope my objections can be taken into account in considering these applications.

Thank you

From:

**Sent:** 26 April 2012 20:50

To: Entertainment Licensing

Subject: Objection to SEV Application: Silks

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

### We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

#### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

I have been a Leeds resident all my life and am very concerned about the recent proliferation of so-called 'Lap Dancing' clubs. I have two young granddaughters and the thought of them going out socialising and using public transport in areas close to these venues is particularly worrying. The potential risk to their safety, indeed the safety of all women, is surely an issue of vital importance.

In addition, I have always been of the opinion that venues such as these (more commonly the old-fashioned 'strip club' in my day) do much to undermine the cause of women's equality. The continued existence of these 'Sexual Entertainment Venues', dressed up as some kind of glamourous career choice, are not the ideal I would have envisaged for my granddaughters.

Regards,



Entertainment Licensing Leeds City Council entertainment.licensing@leeds.gov.uk

25 April 2012

Dear Entertainment Licensing,

#### Objection to SEV application Silks lap dancing club, reference SX/SEV/00012/12/01

## I am writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, problems that could arise from the location and the number of clubs already in Leeds:

I have lived and worked in Leeds since 1987.

Silks is located south of the city centre, just past the dark arches, in an area which has already been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, and where a number of sexual assaults on women have taken place. The Royal Town Planning Institute advise their members that the views of women should be considered when considering locations in the city, stating specifically that 'Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable'. I currently try to avoid walking alone at night in this part of the city centre because I do not feel safe. If Silks is to be licensed to operate there, I would never be able to walk there, because the presence of a lapdancing club would greatly increase my chances of being harassed and threatened in the street. Many women and girls have no choice but to walk through this part of the city on their way to and from offices and the railway station. The location of Silks is also on the route taken in the evening by women walking to and from the restaurants beyond the dark arches and the railway station and city centre bus stops. Just past the entrance to Sovereign Place, where Silks is located, are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

I oppose this licence application most strongly on all of the grounds set out above.

#### If the application is granted I would ask for the following considerations to be made:

I understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and was subject to action from local politicians. I would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on the streets of central Leeds. I would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

I understand that Condition 18, 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours', was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones'. I would challenge this on the grounds of concerns for dancers' welfare; I believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily be disseminated on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and I see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With regard to condition 23 – 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm' – I would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. I would like this to be included in conditions, again with dancers' welfare in mind.

Yours sincerely



We wish to object to the licensing of the following sex establishments

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate

I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed in the first place, it is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do so.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it...The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey)... into a potentially upsetting, disturbing and often threatening experience." *Rape Crisis England & Wales* 

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to ... eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (*Eden, 2003*).

These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lapdancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26%

of people believe that an inappropriately dressed woman is 'asking for it' *(Amnesty/ICM, 2005)*. The numbers of reported rapes around lap dancing clubs is three times the national average *(Eden, 2003)*.

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

Support After Rape & Sexual Violence Leeds (SARSVL) deals with the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Their advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (*Vision for Leeds 2011-2030*).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

SARSVL is currently looking for premises in the city centre and has rejected one option because of its close proximity to a lap-dancing club. We cannot expect women to run the gauntlet of the harassment and intimidation created by these clubs in an attempt to access or deliver SARSVL's services.

References:

EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves

EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London

18

From: Sent: To: Subject:

25 April 2012 17:06 Entertainment Licensing objection to SEV application

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles.

The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to

control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

Further considerations we would like to make about granting a licence to Silks: There are over 7 strip clubs in Leeds, so many isn't necessary and conflicts with Leeds' cultural reputation. Also, Silk's is predominantly the worst culprit for targeting mixed groups and curb crawling for customers without regard for the feelings of the women present in these mixed groups (often also approaching couples.) The music blarring is intrusive and can be heard minutes before the beastly trucks can be seen, making for an uncomfortable Saturday as you hope they don't stop and ask your group of friends containing males.

Regards,

I wish to object to the licensing of the following sex establishments

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate

I wish to object to the licensing of all these sex establishments – see below. I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed. It is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it.....The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey).....into a potentially upsetting, disturbing and often threatening experience." Rape Crisis England & Wales

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

#### The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to .....eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (Eden, 2003). These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lapdancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26% of people believe that an inappropriately dressed woman is 'asking for it'

(Amnesty/ICM, 2005). The numbers of reported rapes around lap dancing clubs is three times the national average (Eden, 2003).

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

The council needs to consider the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (Vision for Leeds 2011-2030).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

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of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

References:

EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves

EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London





From:Sent:25 April 2012 07:18To:Entertainment Licensing

Subject: Lap Dancing and Exploitation

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

# We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

Regards,

From:

Sent: 25 April 2012 20:27

To: Entertainment Licensing

Subject: Objection to SEV licence: Silks

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

### We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

#### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

The continued existence of these venues is totally out of step with women's right to equality. If racism and homophobia are not legally acceptable, why should sexism be? The council would presumably not allow a club in which black people put on shows for whites, or gay individuals danced for the amusement and derision of the straight community, so why is it considered acceptable for women to dance half naked for fully clothed men? How funny that sexism persists in the 21st century, when a 'Black and White Minstrel Show' would be deemed at best an anachronistic joke, and at worst offensive and illegal.

Whilever these venues exist, Leeds cannot be said to be a city which values and accepts women equally.

Regards,



Entertainment Licensing Leeds City Council entertainment.licensing@leeds.gov.uk

25 April 2012

Dear Entertainment Licensing,

#### Objection to SEV application Silks lap dancing club, reference SX/SEV/00012/12/01

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for **Silks lap dancing club, reference SX/SEV/00012/12/01** and please can you confirm that it has been received within the consultation period?

#### I am writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, problems that could arise from the location and the number of clubs already in Leeds:

I am a woman who has worked in Leeds for the last 25 years and lived in Leeds for the last 12 years. I have done extensive voluntary work to support women who experience violence from men they know and women and girls who have experienced sexual violence. I also taught young women in Leeds for over 20 years. Women have the right to be in all parts of the city, and no woman or girl is safe or comfortable in the vicinity of a sexual entertainment venue. There is abundant anecdotal and research evidence of routine harassment of women by men in the streets around these establishments; of young women being approached in the street by employees of the establishments and enticed to work there; and of male customers of the establishments harassing women in the street verbally and physically.

Silks is located south of the city centre, just past the dark arches, in an area which has already been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, and where a number of sexual assaults on women have taken place. The Royal Town Planning Institute advise their members that the views of women should be considered when considering locations in the city, stating specifically that 'Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable'. I currently try to avoid walking alone at night in this part of the city centre because I do not feel safe. If Silks is to be licensed to operate there, I would never be able to walk there, because the presence of a lapdancing club would greatly increase my chances of being harassed and threatened in the street. Many women and girls have no choice but to walk through this part of the city on their way to and from offices and the railway station. The location of Silks is also on the route taken in the evening by women walking to and from the restaurants beyond the dark arches and the railway station and city centre bus stops. Just past the entrance to Sovereign Place, where Silks is located, are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

I oppose this licence application most strongly on all of the grounds set out above.

#### If the application is granted I would ask for the following considerations to be made:

I understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and was subject to action from local politicians. I would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on the streets of central Leeds. I would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

I understand that Condition 18, 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours', was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones'. I would challenge this on the grounds of concerns for dancers' welfare; I believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily be disseminated on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and I see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With regard to condition 23 – 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm' – I would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. I would like this to be included in conditions, again with dancers' welfare in mind.

Yours sincerely



From:Sent:13 April 2012 12:17To:Entertainment LicensingSubject:Objection to SEV applicationLeeds City Council Licensing Committee

Leeds Civic Hall

Leeds LS1 1UR

Dear Sirs,

I object to the licensing of the following establishments

Red Leopard, The Headrow

Silks, Sovereign Place

Wild Cats, The Headrow

Deep Blue, Wellington St

Purple Door, York Place

Liberte, York Place

Black Diamond Club, New Briggate.

I must be clear that I object to all Lap Dance Clubs per se. They promote the sexual harassment of women. In traditional strip clubs women are objectified by having to strip for men for money. But in these lap dance clubs because of their peculiar rules women even have to solicit men to get them to pay for them to strip for them. Like prostitution, or licensed rape.

Men shout abuse at women and then obtain gratification by paying women to strip naked for them. It is violence against women. It is sexual harassment of women. Legitimised. Of course this encourages men to treat all women in this way once they are out on the street. When clubs are licensed for this sex entertainment right in the centre of our city it says clearly that Leeds approves of this. I/we object particularly to Lap Dance Clubs on the Headrow in the centre of our city, opposite the Town Hall and the Library. Whatever else you do please close Red Leopard and Wild Cats and make the centre of our city safer for women.

Yours faithfully





to: entertainment.licensing@leeds.gov.uk subject: objection to SEV application

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

#### We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds.

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria

Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

Regards,

Page 1 of 3

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Appendix F

From:

**Sent:** 12 April 2012 15:32

To: Entertainment Licensing

Subject: Objection to licensing sex establishments in Leeds

Dear Sirs

I wish to object to the licensing of the following sex establishments:

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate

I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed in the first place, it is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do so.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it... The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey)... into a potentially upsetting, disturbing and often threatening experience." *Rape Crisis England* & *Wales* 

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to ... eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (*Eden, 2003*).

These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lapdancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26% of people believe that an inappropriately dressed woman is 'asking for it' (*Amnesty/ICM, 2005*). The numbers of reported rapes around lap dancing clubs is three times the national average (*Eden, 2003*).

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

Support After Rape & Sexual Violence Leeds (SARSVL) deals with the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Their advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (*Vision for Leeds 2011-2030*).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

SARSVL is currently looking for premises in the city centre and has rejected one option because of its close proximity to a lap-dancing club. We cannot expect women to run the gauntlet of the harassment and intimidation created by these clubs in an attempt to access or deliver SARSVL's services.

Yours sincerely



References:

EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves

EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London



From:

Sent: 25 April 2012 11:07

To: Entertainment Licensing

Subject: Objection to SEV licence: Silks

Dear Entertainment Licensing,

Please can you acknowledge receipt of this objection to the Sexual Entertainment Venue licence for Silks lap dancing club, reference SX/SEV/00012/12/01 and please can you confirm that it has been received within the consultation period.

#### We are writing to request the above application is refused on the grounds of location, including premises in the vicinity, the character of the club's locality, issues that could arise from the location and the number of clubs already in Leeds:

Silks is located south of the city centre, just past the dark arches, already an area which has been identified by women during a consultation for Reclaim the Night Leeds in 2010 as an area where they feel vulnerable, the location of the club perpetuates this as confirmed by The Royal Town Planning Institute[i] who advise their members that the views of women should be considered when considering locations in the city, stating specifically that "Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable." Just past the entrance to Sovereign Place, where Silks is located are bus stops Z2 and Z3 which provide buses to Wakefield, Huddersfield and Beeston. Women needing to catch these buses in this location are forced into a position of vulnerability.

There are currently 7 active lap dancing clubs in Leeds, all in the city centre, all within less than a miles walking distance from Silks, the closest are only 0.5 miles away, the furthest are only 0.7 miles away. Having such a saturation of these clubs in Leeds city centre promotes a culture that degrades women and effectively creates a city centre wide no-go area for women. Recent research from the Local Government Association[ii] identifies that 72% of council officers think that clustering of lap dancing clubs is damaging the local economy.

#### If the application is granted we would ask for the following considerations to be made:

We understand that all advertisements must be approved by the council and we would ask for consideration of the following: Due to the use of lap dance club branded vehicles that drive slowly though Leeds promoting the clubs, the area of influence of the club extends well beyond the geographical location of the club. The existence of the practice is noted in the consultation report, and has been subject to action from local politicians. We would request that these vehicles are prohibited, but if to be allowed, that they display no images of women or the female form including silhouette or disguised as an animal.

The use of these vehicles creates an intimidating and hostile presence in the city centre, due to their practice of cruising round the city at slow speeds trying to attract customers to get into their vehicles. The driver of the vehicle, or other employees of the club should be prohibited from approaching members of the public to encourage them into the vehicle, including calling out from within the vehicle. The vehicles should also be prohibited from driving at walking pace.

The littering of promotional material on the streets of Leeds also extends the sphere of influence. Leaflets with explicit images frequently remain in the morning on Park Row, Victoria Gardens, The Headrow and Cookridge Street. We would request that discarded flyers must be collected by the clubs before the morning commuters arrive in the city centres and that these flyers would also not include images of women or the female form including silhouette or disguised as an animal.

We understand that Condition 18 'The taking of photographs and visual film footage (other than CCTV) is not to be permitted on the premises during operating hours.' was removed at consultation due to the objection that it would be 'virtually impossible to control, especially with the advent of cameras on mobile phones.' We would challenge this under concerns for dancers' welfare, we believe allowing photography in lap dancing clubs will allow for pornographic images to be taken of women, which could then easily exist on the internet and in pornographic publications without the consent of the woman involved. Many other establishments (designer shops / art galleries / music venues) have photography bans, and we see no reason why, with the dancers' welfare in mind, this rule cannot be extended in lap dancing clubs.

With condition 23 'Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.' We would again request that any signage used does not include images of women or the female form including silhouette or disguised as an animal.

Employers of staff who work unsocial hours (for example fast food outlets) provide their staff with a free taxi home as public transport has often ceased when the staff have finished their shifts. Women at who work at lap dancing clubs are potentially at risk if they found themselves on the same public transport as someone who had been a customer earlier in their shift, as she would no longer have the protection of the security staff. We would like this to be included in conditions, again with dancers' welfare in mind.

We would like further consideration to be taken regarding the opening times of these clubs. It is inappropriate that they should be able to operate close to 24hours a day, making the effects of the clubs on the locality an all-day occurrence.

#### Further considerations we would like to make about granting a licence to Silks:

As a lifelong resident of Leeds and mother of two young daughters, I am extremely concerned about the potential long-term impact of allowing clubs such as these to flourish. I strongly believe that a culture which normalises the sexual objectification of women is not a positive one to be growing up in. How do I explain what these places are when my daughters ask whilst we are walking around the city centre? What messages does this send her? That a woman's only worth is in her physical appearance? That a woman's main purpose in life is to look sexy for men?

And what about the impact of these messages on young men; are they going to respect women as human beings with rights and feelings after a trip to Silks? In a culture which already seems to still believe that women who are raped must be somehow to blame, do clubs such as Silks fuel these myths; after all, if she was dancing sexy for me in the club, then she must be 'up for it'.

Which brings us to the impact upon the dancers themselves, who scrape a living working in these clubs. Not only are there many issues around physical safety as mentioned above, but the mental wellbeing of the women who are routinely degraded for a living by men who do not see them as real people, but sex objects who are there purely to please them. I think we are well aware now that the 'no-touching' rule is not always enforced. Many women who end up working in these environments have previous experience of sexual abuse; how cruel that they now simply accept this as a norm in their working lives, in a 'legitimate', approved, licensed premises.

In summary, I firmly believe that venues such as Silks do not provide a positve image of the Leeds as a cultural, forward-thinking city. Furthermore, the potential negative impact upon the rest of our society cannot, and should not, be underestimated.

Regards,

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From:	
Sent:	24 April 2012 12:56
To:	Entertainment Licensing
Cc:	

Subject: Objecting to the re-licensing of 8 lap dancing clubs in Leeds

To the Licensing Committee

Friends,

#### Re: Objecting to the re-licensing of 8 lap dancing clubs in Leeds

I am very concerned about the collective damage done to society by the continued proliferation of the lap dancing industry. As a Feminist and a Quaker I object to the sexual and financial exploitation of women and men.

Personally, I have seen one marriage heading for divorce because of the man's addiction to the clubs and another man I know who has created 1000's of pounds worth of debt because of his addiction to lap dancing. I have a concern not only for the exploitation of women but of the individuals who are "clients" or "customers" of lap dancing venues.

I note that Leeds City Council have decided to consider each license on a case by case basis when other cities have set a cap on the number of lap dancing clubs or imposed strict restrictions on the character of the locality that they can operate within.

In light of this I ask that the licensing committee use their discretionary powers when considering all eight clubs to:

Refuse all applications and set a nil limit for the future.

#### Where they do exist they should not be:

1. Located on or be visible from main thoroughfares, main shopping streets or community spaces.

2. Located near civic buildings or places of worship.

3. Able to tout, offer lifts to or advertise their clubs using cars or women as promotional tools.

#### This is so that:

1. Leeds can be experienced during the day by residents and visitors without encountering a lap dancing club.

2. Civic celebrations and memorial services can take place without lap dancing clubs in the background.

- 3. At night the sex industry does not dominate the character of the city.
- 4. People in Leeds are safeguarded from the effects of the sex industry.
- 5. People can easily avoid the sex industry if they wish to.
- 6. The licensed sex industry where it operates does so in a discreet manner.

I welcome the new powers available to Local Authorities and call upon Leeds City Council to use them to make the city of Leeds a healthier place for all residents.

In Friendship,

From:

**Sent:** 26 April 2012 19:23

To: Entertainment Licensing

Subject: Licensing objection

I wish to object to the licensing of the following sex establishments

Red Leopard, The Headrow

Silks, Sovereign St

Wild Cats, The Headrow

Deep Blue, Wellington St

Purple Pool, York Place

Liberte, York Place

Black Diamond Club, New Briggate

I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women's treatment as sex objects being condoned right in the heart of our city. This should never have been allowed in the first place - it is an insult to all residents of Leeds and makes the very centre of our city unsafe. You now have the chance to rectify this and close these establishments. Please do so.

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to ... eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape.

These establishments rely on the sexual objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money which goes on inside them. This actively damages women and girls living and working within and near lapdancing clubs.

I also have concerns about the welfare of women working in the clubs, the impact on the

environment around the clubs, how women feel about walking around these areas and what happens to them when they do, and to the general mainstreaming of the commercial sex industry which the licensing of these establishments contributes to.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26% of people believe that an 'inappropriately' dressed woman is 'asking for it' (*Amnesty/ICM, 2005*). The numbers of reported rapes around lap dancing clubs is three times the national average (*Eden, 2003*).

In 2003 Lilith published a small-scale report on lapdancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lapdance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Their advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL (Support After Rape & Sexual Violence Leeds).

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming".

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

I hope you will consider these objections and ensure that the above mentioned establishments are closed down or severely restricted.

Sincerely,



Dear Sir/Madam

I wish to object to the licensing of the following sex establishments

Red Leopard, The Headrow Silks, Sovereign St Wild Cats, The Headrow Deep Blue, Wellington St Purple Pool, York Place Liberte, York Place Black Diamond Club, New Briggate

I particularly object to licensing of sex establishments on the Headrow opposite the Town Hall and Main Library. That is Red Leopard and Wild Cats. It gives a terrible message about violence against women and women as sex objects being condoned right in the heart of our city. This should never have been allowed in the first place, it is an insult and makes the very centre of our city unsafe. You now have the chance to rectify this and close them. Please do so.

"Every woman in our society feels the fear of rape - no woman is allowed to ignore it...The threat of violence is a total intrusion into women's personal space and transforms a routine and/or potential pleasurable activity (for example, a walk or journey)... into a potentially upsetting, disturbing and often threatening experience." *Rape Crisis England & Wales* 

I do not believe that Leeds City Council (LCC) licensing sex establishments is compatible with the Equality Act 2010 and Violence Against Women Strategy, which LCC states that it has taken into account in developing its policy.

The Equalities Act 2010 states that

"A public authority must, in the exercise of its functions, have due regard to the need to ... eliminate discrimination, harassment, victimisation and any other conduce that is prohibited by or under this Act."

Research has shown that wherever lapdance and strip clubs appear, women's quality of life deteriorates as a result, with increased reports of rape (*Eden, 2003*).

These establishments licence the objectification of women so for LCC to licence such premises goes against the duty they have to implement equalities legislation. Licensing such clubs suggests LCC condones the sexual objectification of women for money going on inside them. This actively damages women and girls living and working around lap dancing clubs.

Such establishments contribute to the sexual objectification of women and raise concern about the welfare of women working in the clubs, the impact on the environment around the clubs; how women feel about walking around these areas and what happens to them when they do and to the general mainstreaming of the commercial sex industry.

While lapdancing and the illusion of sexual availability become mainstreamed, rape conviction rates are falling, street harassment and casual attacks are rising and 26% of people believe that an inappropriately dressed woman is 'asking for it' *(Amnesty/ICM, 2005)*. The numbers of reported rapes around lap dancing clubs is three times the national average *(Eden, 2003)*.

In 2003 Lilith published a small-scale report on lap dancing in Camden, Westminster and Islington. The report highlighted the extensive impact that lap dance and striptease clubs had upon women in the local area, in terms of immediate dangers such as a 50% increase in reported rape, but also in terms of less measurable effects, such as increased harassment and fear of violence. Harassment from men leaving the club or touts outside also increased significantly after the opening of a club. Venues offering adult entertainment involving nudity tend to increase perceptions of crime and potential risk, potentially seriously restricting the rights of women in the area to move about freely in safety.

Support After Rape & Sexual Violence Leeds (SARSVL) deals with the reality of the effect the sexual objectification of women and increased harassment and attack of them around these premises. Women in public areas become unwilling symbols of the illusion of sexual availability and are often the physical recipients of male harassment or rape. In the meantime young boys growing up in the area are taught that this is an acceptable way to treat women, and young women learn that this is the way they will be treated.

Advertising for these establishments, including signage and frontages of premises and leaflet distribution in the area, create an intimidating atmosphere and a real threat to the safety of women. No advertising should be allowed for such premises and explicit images displaying what goes on within the clubs should not be allowed. Their advertising should not be allowed in public spaces.

If licensing is to take place, the welfare of women working within the clubs should be paramount. Licenses should require strict enforcement of protection of women from physical contact with customers. Private dance areas should be visible from the rest of the club and monitored by CCTV. Staff should know how they can complain about behaviour that is unacceptable and be given information on services that can support them, such as SARSVL.

Leeds city centre currently has a number of sex establishments in prominent locations, including the Headrow which is a main thoroughfare. These premises and any additions to them advertise Leeds as a city (and a council) that sees the sexual objectification of women as totally acceptable. It also makes the city centre an intimidating, unsafe place for women. It undermines the city's stated aim of being "fair, open and welcoming" (*Vision for Leeds 2011-2030*).

Leeds is a city centre characterised by the close proximity of residential to commercial establishments; in fact it prides itself on this feature. For example, much student accommodation is located in the city centre. This increases the vulnerability of women walking around areas where a number of sex establishments are in operation.

Leeds is a diverse city with a variety of cultures and faiths, representing around 11% of the city. Women from a range of communities are intimidated by the proximity of these clubs and are less likely or willing to travel around the city at night when confronted by the operation of and advertising for sex establishments.

SARSVL is currently looking for premises in the city centre and has rejected one option because of its close proximity to a lap-dancing club. We cannot expect women to run the gauntlet of the harassment and intimidation created by these clubs in an attempt to access or deliver SARSVL's services.

As a female living in Leeds I feel highly uncomfortable at the thought of so many of these establishments being so explicitly in view for our children, in an already sexualised world where young people aspire to grow up and work in these places. I disagree fully with the idea of women inside parading for the satisfaction of rowdy males, taunting and believing they can have a women do anything for them – complete control. Many women are being pushed into this industry by the onset of the recession, but the truth is they are exploited and this selling of sex as a commodity reinforce that violence against women is acceptable. Act now – listen to the women of Leeds!!!

Kind Regards.

#### References:

EDEN, I. 2003 The Lilith Report on Lapdancing and Striptease in the Borough of Camden. London: Eaves

EDEN, I. 2007 Inappropriate Behaviour: Adult venues and licensing in London

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#### Licensing Committee

#### Re: Joint objection to the re-licensing of 8 lap dancing clubs in Leeds

We the undersigned are concerned about the collective damage done to society by the continued proliferation of the lap dancing industry.

We welcome the new powers available to Leeds City Council under the Policing and Crime Act 2009 and we note that other cities have used this to set a cap on the number of lap dancing clubs or imposed strict restrictions on the character of the area that they can operate within.

Given that the eight licenses are being considered together we ask that the licensing committee use their discretionary powers under the new Act to:

• Significantly reduce the number of clubs (by at least half) in operation in Leeds and set a low limit on the number allowed in the city.

OR

• Refuse all applications and set a nil limit for the future.

#### AND

#### Where they do exist they should not be:

- 1. Located on or be visible from main thoroughfares, main shopping streets or community spaces.
- 2. Located near civic buildings or places of worship.
- 3. Able to tout, offer lifts to or advertise their clubs using cars or women as promotional tools.

#### This is so that:

- 1. Leeds can be experienced during the day by residents and visitors without encountering a lap dancing club.
- 2. Civic celebrations and memorial services can take place without lap dancing clubs in the vicinity.
- 3. At night the sex industry does not dominate the character of the city.
- 4. People in Leeds are safeguarded from the effects of the sex industry.
- 5. People can easily avoid the sex industry if they wish to.
- 6. The licensed sex industry where it operates does so in a discreet manner.

We call upon Leeds City Council to use their new powers to further improve the health and wellbeing of the people of Leeds.

Yours faithfully

The Rt Hon. Ed Balls MP The Rt Hon. Hilary Benn MP Hon. Rachel Reeves MP Hon. Alec Shelbrooke MP Hon. Stuart Andrew MP Hon. George Mudie MP Hon. Fabian Hamilton MP Hon. Greg Mulholland MP

Linda McAvan MEP

Bishop John Packer - C of E Bishop Arthur Roche - Catholic Imam Qari Asim - Makkah Masjid Mosque Mgr Philip Moger - Dean of Catholic Cathedral

**Cllr Peter Gruen Cllr Judith Blake Cllr Stewart Golton Cllr Rebecca Charlwood** Cllr Kamila Magsood Cllr Ann Blackburn Cllr Bernard Atha **Cllr Alison Lowe** Cllr Mohammed Igbal **Cllr Neil Walshaw** Cllr Christine Macniven Cllr Patrick Davey **Cllr Alan Lamb** Cllr Penny Ewens **Cllr Ann Castle Cllr Neil Dawson Cllr Kim Groves Cllr Katherine Mitchell Cllr Geoff Driver** Cllr John Illingworth

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**Dear Licensing Committee** 

I write as an academic and policy expert on the sexual entertainment venue (SEV) sector based at the University of Leeds. I was the lead researcher on the largest study to date of SEV sector in the UK "The Regulatory Dance" (some of the fieldwork was centred on Leeds). I am currently leading a dissemination project linked to that research funded by the Economic and Social Research Council. I have met with the Licensing Committee on several occasions and have reported to other Local Authorities and the Institute of Licensing on the pioneering approach to welfare that you have so far taken in relation to the welfare pack.

I am writing to specifically counter the letter sent to the Committee by Leeds MPs and others which calls for a nil policy on SEVS in the city. Our research & dissemination work has highlighted the detrimental impacts of a nil policy. The introduction of a **nil policy** in relation to the licensing of Sex Entertainment Venues would be detrimental in several ways to dancers who work in the industry and the night time economy in Leeds. It would

- Be detrimental to approximately 500 women's economic well being who work in the Leeds industry
  and approximately 250 people who manage and work in other roles. This at a time of economic
  recession.
- Provide reasons/opportunities to drive the industry underground into unregulated venues which
  poses safety issues for dancers and public order issues.
- Ignores the work that has been done with the Leeds SEV sector, and the Licensing Committee as a
  result of direct research findings. This is being looked to by others in the licensing profession
  (through the Institute of Licensing) as good practice, and as taking a balanced approach which
  considers and takes on board wider community impact and also addresses the safety and welfare of
  dancers and others working in the sector.
- Silence the voices and opinions of the vast majority of female dancers (young women under 30)
  who make choices to engage in the industry as a flexible, relatively high earning form of work in
  very difficult economic times.

#### DIRECT WORK WITH THE LEEDS INDUSTRY AND LICENSING COMMITTEE

As part of a follow on impact and dissemination project<sup>1</sup> funded by the Economic and Social Research Council (2011-12), Dr Teela Sanders and Rosie Campbell, University of Leeds, have been working with Leeds Licensing Committee and several others to feedback the research findings from "The Regulatory Dance" (see below) regarding welfare and safety issues with dancers in an effort to replicate good practice evident in some of the clubs in Leeds (and elsewhere).

This has involved presenting evidence to the Committee on two occasions and also training the Licensing Committee in March 2012 on the possible ways in which standard conditions can include core dancer safety and welfare issues. As a result Leeds has included a pioneering 'welfare pack' that licensees must provide to dancers (see section 53 of Licensing Conditions) and demonstrates a commitment to improving the working conditions within clubs.

<sup>&</sup>lt;sup>1</sup> http://www.sociology.leeds.ac.uk/assets/files/researpagegulatory\_Dance/AbstractSex\_Entertainment\_Venues.pdf

#### THE REGULATORY DANCE RESEARCH PROJECT (the original research)

Carried out during 2010-2011 "The Regulatory Dance" is the largest study to date of lap dancing in the UK and is the key study illustrating dancers experiences and working conditions. It involved a large scale survey of N=197 dancers. Follow up interviews were carried out with N=35 dancers, N=20 other people involved in the industry (including bar staff, security, 'house mums', managers and owners) and N=15 regulators (including licensing & enforcement officers, health and safety inspectors and the police).

- 1. The vast majority of dancers had made a decision to do dancing/stripping as a flexible, relatively high earning (although unpredictable), cash-in-hand form of work.
- Most women did not report violence and felt safe due to security, but verbal harassment & unwanted touching from customers was an issue: reported variably by dancers.
- 3. There was no evidence of organised prostitution or trafficking / forced involvement, although some migrant workers were paying out a lot for accommodation and organisation of their work.
- 4. Most dancers were concerned about the high fees, commissions and fines they were paying to the management; especially on occasions when they were taking relatively little money home. 70% of respondents said they had left a shift without earning any money (due to what they had to pay out).
- 5. There was overall concern amongst dancers that their welfare and working conditions were not being taken seriously by the new legislation relating to licensing but rather assumptions were being made about exploitation and views of sections of the community's were favoured against dancers.
- 6. The research from interviews with regulators including licensing and police officers was that compared to other bar and club venues in the night time economy SEV venues were the source of very few problems or complaints in terms of public order, safety and nuisance.

For further information about the research project you can see the Initial findings (April 2011) and Visual Summary Findings at: <u>http://www.sociology.leeds.ac.uk/research/projects/regulatory-dance.php</u>

I hope that these evidence based arguments hold weight against politicised calls to close down an industry which has a long standing, appropriate and safe presence in the city.

I would like this letter to be used in all outstanding applications and I am happy for my name/letter to be made public.

Yours sincerely

and al

Dr Teela Sanders Reader in Sociology, University of Leeds

#### **THE REGULATORY DANCE:** Sexual Consumption in the Night Time Economy **Findings Summary**

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Dr Teela Sanders & Dr Kate Hardy School of Sociology & Social Policy



## SEARCH QUESTIONS METHODS 20

How are clubs regulated internally and externally? How do dancers experience clubs as workplaces? How has the rise of lap dancing happened?

## Survey

#### We asked about: 197 dancers

- motivations and journey into dancing;
- other forms of work; education;
- The feelings about work; Bearnings, fines and fees; The tax;
- 다 unions; 아 advantages & disadvantages

### We asked:

'What were the conditions like in your last four clubs?'

## Respondents had worked in:

- 45 towns and cities
  - 16 places worldwide

## Interviews

- 35 dancers
- 20 club workers; owners, managers, bar workers, security, house mums
- icensing and enforcement officers; Local 15 regulators: police; health and safety; Authority officials

## We conducted observations and visits to 20 clubs and pubs

## WHO ARE THE DANCERS?

## Demographics

### Age range of 18-53, but mainly 22-29

- Majority not mothers (83%)
- The majority of the dancers were British (61%) 29% were EU nationals (largely Romanians)
- 10% were non-EU nationals (largely Brazilians)

### Education

- 87% had completed further education
- 23.2% had completed undergraduate education
  - 5% had completed postgraduate education
    - 29% of dancers were engaged in some form of education while dancing

## **Other work**

- 42% of dancers were engaged in some form of other employment
  - Mainly formal but low pay and low skilled jobs were left behind for dancing.

## **Nork Patterns**

- \* 70% of dancers had been working for less than 5 years
- Most dancers worked between 3-5 shifts per week, though 25% did two or less
- 12% worked 6 nights per week, and these were mainly migrant women
- seven and ten out of ten. No dancers said that 74% stated their job satisfaction as between heir job satisfaction was 0-2.

MONEY	I A A	_/	<ul> <li>42% had been fined in their current workplace for 'rule breaking'</li> <li>61% had been fined at least once during their time denoting</li> </ul>	<ul> <li>Fines issues for chewing gum; using mobile phone; lateness; absence; taking time off; drunkenness; outfits</li> <li>Fines range: £10-£50</li> <li>Fines were arbitrary</li> </ul>		<ul> <li>&gt; 50% of dancers reported losing money in their current workplace</li> <li>14% had had owed debts to the club</li> <li>56% had paid NI and tax</li> </ul>	<ul> <li>83% had never had a wage slip</li> <li>90% had never had a contract</li> <li>96% did not pay into a pension</li> </ul>	No dancers had ever received holiday pay or sick pay	"If club is not busy, should let girls go home you have to pay the full fee to go home".	"It's gone down, my satisfaction, as it is harder to make money. Everyone is a bit desperate now. Bit hard to give them what they want to get them to stay and spend more money"	"I actually don't need to dance, I just talk. I can't remember the last time I did single dancing. They are a waste of time. That's not how you make money. They pay me for conversation…I go to VIP, they pay you straight away… that is much easier".
Girls please note as from Girls please note as from Girls please note as froor Girls please saturdays	-	Eulowing firms arboung gum £10 Consumbtion of chewing gum £10 Being in pessession of chewing gum £10							"If club is not busy, shoul	"It's gone down, my satisf desperate now. Bit hard to money"	"I actually don't need to a dancing. They are a waste conversation…I go to VIP,
	ANCING			<ul> <li>Disadvantages</li> <li>59.1% - I never know how much money</li> <li>1 will earn</li> <li>47.4% - I have to keep my job a secret</li> </ul>	<ul> <li>40.1% - Customers are rude or abusive towards me</li> <li>30.7% - I have lost respect for men</li> <li>27.7% - I feel I have to compete with the other dancers</li> </ul>		"I don't like it for the fun! It's a job"	"I find the terms and conditions of the job [depending on the club/company] disempowering and exploitative. I find	the general public understanding of mv job to be frequently inaccurate and	judgemental". "Management come and they say, "do this, do that" but we're self-employed so they	We should be allowed to wear what we wear. We should be allowed to wear what we want, we're self-employed".
FEELINGS		TEA AND COFFEE and more proper and account acc		Advantages <ul> <li>87.6% - choosing their hours</li> <li>81.8% - getting money straight away</li> <li>80.3% - earning more money than in</li> </ul>	G other roles ▲ 76.6% - being independent 4 72.5% - combines fun and work		"I am a performer and for me this is fun. When you go to the clubs with private	dancers, it then comes down to the management and security being good and on the ball. If they run it well you'll be fine,	but beware of dodgy managers!"	"I am free to study and earn enough to live comfortably in London. I have time for holidays, unlike my friends who are in regular employment The atmosphere	work to do as I like I am my own boss and it keeps me super fit".

## FUTURE / CHANGE IN REGULATION

# **CONCLUSIONS**

#### Crime Act changed the ways in which lap dancing venues are In 2010 the Policing and licensed. As a result:

- Clubs have been reclassified as Sex Entertainment Venues
- Local Authorities have greater control over the amount of clubs
- An uneven landscape of licensing is emerging across the UK
- o Some LAs are reducing the numbers of clubs or adopting a 'nil policy
- It was felt that such reductions would lead to loss of jobs and force the industry 'underground'

## New regulation was felt to be necessary:

have a first aid box. As it currently stands, "The industry requires regulation in order to prevent unfair and unpredictable rules be some form of uniform guidelines with regards to the way in which these places being aimed at workers. There needs to feel that management ultimately have are run. For example: my club does not complete control over workers, it is this which is actually exploitative, not the actual strip work". But many dancers feel that the and improving their conditions: current system of regulation is insufficient in protecting them

fees and fined and treated by the owners, "The new licensing laws have nothing to change the way the dancers are charged in fact they will now probably have to charge the dancers more to cover the licensing cost'

- for a different future through other forms of Dancing was part of a strategy for making money whilst at the same time preparing work or education
- Dancers liked their work, but experienced high levels of financial exploitation
- There was significant variation in standards of management and safety between clubs
- frequently experienced but was generally supported by security and management Verbal abuse and unwanted touch was dealt with by dancers, and usually
- Safety was a complex issue:
- Measures such as CCTV and door staff did not always increase safety
- Yet on the whole most dancers felt safe working in clubs
- The regulation of clubs under current policy does not automatically address issues of welfare, employment status or financial exploitation

#### **Recommendations**

- Clearly displayed council rules in a number of places in the club: tailete changing roome sta
- toilets, changing rooms etc
  Offer a receipt for fines and fees make
- sure fines and fees go through the books
- Offer a receipt for dances where commission is taken
- Monthly meetings to discuss rules, changes, get dancers' input
- Tighter regulation on the location and type of private booths to achieve a balance between privacy and security
- Insurance information for the dancers
- Limiting the number of dancers per capacity of clubs



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#### THE REGULATORY DANCE: SEXUAL CONSUMPTION IN THE NIGHT TIME ECONOMY

#### SUMMARY OF FINAL FINDINGS (Jan 2012)

Dr Teela Sanders, Dr Kate Hardy and Rosie Campbell

#### **INTRODUCTION**

Funded by the Economic and Social Research Council and carried out during 2010-2011 "The Regulatory Dance" is the largest study to date of the strip and lap dancing industry in the UK night time economy. It is the key study illustrating dancers' experiences and working conditions. This briefing reports on findings from the study.

It also draws on information gathered during further consultation with local authority licensing officials, club owners/managers and dancers in the first phase of new project *"Sexual Entertainment Venues: Regulating Working Conditions"*, which is disseminating and making use of the findings. This follow on project is an Economic and Social Research Council project being carried out during November 2011 until the end of October 2012.

#### **METHODS**

The research involved;

- An interviewer-administered survey conducted with 197 dancers regarding their experiences across 45 towns and cities in the UK and 16 other locations worldwide.
- Interviews with 35 dancers and 20 other people involved in the industry (including bar staff, security, 'house mums', managers and owners) and 15 regulators (including licensing and enforcement officers, health and safety inspectors and the police).
- Observational methods: 20 clubs were visited
- A photographic visual methods element.

#### KEY FINDINGS: DANCERS' EXPERIENCES and WORKING CONDITIONS

#### Who are the Dancers? Demographics

- *Age*: 60% were aged between 22 and 29. The age range spanned from 18-53 years.
- Age started dancing: 74% started dancing when they were under 25 years old.
- Relationship status: Half of the dancers were single (45.5%), but the other half were in some form of relationship with someone with whom lived (21.4%) or did not live (20.2%). Only 9.5% of the dancers were married.
- *Mothers:* Only 13.5% of dancers surveyed had children. No dancer had more than two children.
- Nationality: British nationals constituted over half the dancers surveyed (60.5%); EU nationals, 28.6% (largest group being Romanians); 9.6% non-EU nationals (mainly Brazilian).
- Education: All of the dancers had some education and had finished school with some qualifications. 73% had completed at least Further Education, while 23% had completed an undergraduate degree. One third of dancers were currently students. Of these 60% were in full time education; 25% in part time education and the remainder taking evening classes.
- Other work: A minority (40.2%) were solely dancing. All others were in education (14.2%), another form of work (32.6%) or both other forms of work and education (10.6%).

#### **Patterns of Working**

- Length of time working: 70.9% had been working for less than 5 years.
- Number of clubs: Respondents had danced in between 1 and 35 clubs. Most women had worked in only 1-2 clubs. Women that had danced in more than ten clubs tended to have worked for agencies.
- Shifts: Most dancers worked between 3 and 5 shifts a week (62.6%). A small minority, 12.9% worked 6 or more shifts per week and migrants were likely to work more shifts. Over 90.5% stated that they felt able to choose their shifts. Shifts can be 10-12 hours long.

• Earnings: Women generally reported earnings going down from the first club they worked in to the current club at the time of the survey. Earnings ranged from £0-£800 per shift. The average earnings per shift in the first club that women worked in was £284 while the average that women currently reported was £243.

#### **Reasons for Dancing**

The reasons that dancers gave for leaving jobs prior to dancing varied widely. The largest proportion (21.4%) stated that they simply wanted to become a dancer. A further 16.1% said that they were seeking better pay than their previous position. Escaping boring or stressful work also featured highly. Dancers mainly found work in their first club through friends (41.1%) or the Internet.

The vast majority of dancers had made a decision to do dancing/stripping as a flexible, relatively high earning (although unpredictable), cash-in-hand form of work. Dancing was a popular employment option for some women who were working in low paid, unskilled jobs, but were motivated by the opportunity for future mobility.

#### Advantages and Disadvantages of Dancing

Dancers identified a number of advantages and attractions. Key amongst these were, 'flexibility' and independence, instant remuneration, earning more than in other roles, keeping fit, and an opportunity to combine fun and work. This resulted in a steady flow of labour supply. However some of these exact characteristics could be disadvantages as dancing remained precarious in terms of a stable income, high overheads, no employee protection, and a competitive environment. Coupled with fewer customers and expenditure during the recession, dancing proved to be a difficult job without guaranteed income. There were also disadvantages for some dancers of keeping the job secret and rude/abusive clients were a problem.

No evidence or anecdotes of forced labour or trafficking of women was found. However, some migrant workers reported high fees for agencies and accommodation. Although 'extra services' were reported anecdotally by dancers, there was no evidence of lap dancing having connections to organised prostitution. Dancers generally reported high levels of job satisfaction. Almost three quarters (74.1%) stated their job satisfaction as between 7 and 10 out of 10. No dancers said that their job satisfaction was 0-2.

However, they faced a number of problems in the work place, relating to *customer behaviour; insecure work;* and *financial exploitation*.

#### **Customer Behaviour and Safety**

- Sense of Safety: Most women (80%) said they felt safe at work and supported by managers when there was a dispute with a customer, but there were significant differences between clubs.
- Harassment: Yet 51.9% of dancers reported having received harassment 'lots of times' or a 'a few times', nearly half reported frequent verbal harassment and unwanted touching from customers. This was reported more widely in clubs with private dancing than those with only stage shows.
- Security: The quality of security in clubs was very important to dancers
- Booths: many dancers felt that the way in which private booths were set up also made them vulnerable and also allowed standards to be lowered by dancers offering more than is allowed in the dances.

#### Financial Exploitation: Fees, Fines and Commission

House Fees: dancers had to pay, house fees ranging from £0-£200, though the average was around £20-30 in the North and around £80 in the South.

"In the clubs the house fees are so enormous it puts you in such a stressful position to start up with; it's not a good attitude to go and start working from".

*Commission:* In addition to fees, dancers paid commission. This ranged from 0-66%, though it was usually 30% for each dance.

 Fines: Dancers were also fined frequently (often arbitrarily). 61% had been fined at some point in their dancing career, 42% in their current work place. The highest reported fine was £100 for a missed shift. The most common were for chewing gum, using mobile phone on the floor, incorrect clothing and lateness.

- Tipping: 50% reported working in clubs where there was an internal tipping system to DJs, waitresses, bar staff and house mums, which in effect acted as an additional fee.
- Making no money: due to high overheads (house fees, commission, fines, tips, travel to work): 70% reported leaving a shift without making any money.

#### Insecure Employment and Tenuous Position as Independent Contractors

- Self employed: dancers are defined as self employed. They had no contract with, or obligation to, the club.
- Flexibility: this flexibility is one of the key attractions to the industry.
- House rules and codes of conduct: yet there were strict, often arbitrary, house rules and codes of conduct which dancers had to sign up to which transferred power to managers, giving them strong disciplinary powers over the dancers.
   Dancers were concerned that the operation of fines could be linked to favouritism and bullying.
   Some clubs have strict rules like no hot food.
- Confusion About Status of Contracts and Rights: dancers were unclear whether Codes of Conducts constituted contracts and what rights and obligations these entailed. The gap between dancers official and actual statuses as selfemployed was raised by dancers:

"Management come and they say, "do this, do that", but we're self-employed, so they shouldn't be able to. Also, what we wear. We should be allowed to wear what we want, we're selfemployed".

- Lack of Information About Council Rules: many of the women felt that they didn't have access to knowledge about what the council imposed rules were and which had been instituted by the club.
- Lack of negotiating power and fear of dismissal: many dancers felt unable to complain about conditions and negotiate conditions for fear of instant "dismissal". Dancers tended to move to other clubs if they were unhappy.
- Insurance: few dancers had work-related insurance. Some vaguely knew that they needed it

as self employed contractors, but others had never thought about it and no-one had ever spoken to them about it.

- National Insurance: 56.7% (n=59) reported paying National Insurance and 56.9% (n=62) reported paying tax at some point during their dancing careers.
- Dancers on Shift: dancers were critical of clubs who had too many dancers on a shift so with a higher dancer to customer ratio it was more difficult to make money. Fees, commission and fines were seen by some as making an unfair and disproportionate contribution to club running costs and in some cases keeping struggling clubs open.
- Dancers' relationships and perceptions of owners and manager were varied: distinctions were made between reasonable and unreasonable managers, reasonable managers were seen as fair and considerate of dancers' welfare and others were seen as more self interested, concerned only with profit.

Dancers' status as 'self employed' workers resulted in exploitation as they had no rights or recognition in the workplace. The continuous supply of dancers, rather than the demand for erotic dance, accounted for the expansion of the industry.

#### Improving Conditions and Security/Safety

Dancers themselves suggested a number of measures to improve conditions and welfare including;

- Limit number of dancers per shift
- Minimum payment stipulations
- Better physical environments (heating, changing rooms, cooking facilities)
- Either commission OR house fee (not both)

To improve safety dancers identified as important;

- More quality door staff
- Proactive door staff who patrolled the floor and supervised booths
- Other staff looking out for the safety of dancers and the employment of "House mums"
- Panic alarms in booths
- More CCTV

- Clear display of rules for customers and reinforcement of these
- Dancers had a range of personal safety tips learnt through experience which they felt would benefit new dancers

Lap dancing clubs and strip pubs are workplaces, but regulatory assessments, criteria and licensing process did not examine the industry from this perspective. As a result, dancers are open to financial exploitation, disciplinary measures and few employment rights.

#### **KEY FINDINGS: LICENSING**

#### New Sexual Entertainment Law

The research took place at a pivotal time in which all Local Authorities were re-writing their policy on licensing lap dancing as a result of changes introduced under the Policing and Crime Act, 2010. A new classification of Sexual Entertainment Venue (SEV) has been introduced, aligning lap dancing clubs with the same licensing process as sex shops and cinemas. Further changes essentially give Local Authorities greater powers to control the number of clubs, by using quotas or introducing 'nil policies' which aim to remove existing clubs or prohibit new licenses. New powers also mean that Licensing Committees have the ability to impose certain conditions on licenses to dictate how they operate.

*Change in Licensing*. There was a strong feeling that the legal changes introduced under SEV licensing would not help the industry be safer or a good place to work: there was overall concern amongst dancers that their welfare and working conditions were not being taken seriously by the new legislation relating to licensing but rather assumptions were being made about exploitation and the community's views were favoured against dancers.

> "Councils and any other people who are going to pass legislation need to understand that we do need things to change....but what they're doing at the minute is changing it for the worse, because it's just going to push it underground, because there are more illegal clubs opening where they're run by people that we don't want them to be run by."

In terms of the new law licensing practitioners generally considered that:

- The new laws would be more restrictive for the industry, and there is likely to be considerable variation according to local council policy.
- As there was market demand for the sale of lapdancing, where restrictive policies were implemented by councils, there may be illegal and unregulated venues which start to operate. There was concern that these venues would lack the necessary safeguards.
- There was concern that customers may migrate to areas where more clubs were operating. This may have a negative impact on the night-time economy.

#### Licensing Practitioners Concerns and Bad Practice

The main concerns regulators had with clubs were; incomplete staff registers, sub-standard operation of CCTV, complaints related to the issue of bills not being paid by customers, the practice of the door staff (being too aggressive or too 'friendly' with the dancers), incidents of problematic noise-levels, sexual services are being sold on the premises, exploitation of the dancers, drug use on the premises, external signage and advertising being too explicit and vehicles being driven in the city-centre which advertise the club and drive customers from the streets to the club.

Bad practice was not found to be common, but was associated with certain venues. Examples of this were issues such as; resistance to resolving issues, allowing touching in the clubs, noise, poor risk management, health and safety, slips and trips on the dance floor, poor backstage areas and poor practice associated with welfare of dancers and club staff.

#### Dancer Welfare, Safety and Licensing

The research found;

- That working conditions and welfare of dancer facilities differed across clubs and larger clubs were not necessarily better.
- Risks to dancers safety and health were seen as; assaults (which were noted as occurring but infrequently), harassment in the booth areas of the clubs, safety in getting home after shifts, and the risk of slipping and tripping on the dance floor and pole safety, frequency of breaks and club temperature. The role and conduct of the doorstaff in response to assaults was seen as very important.

- The priority for enforcers tended to be related to compliance with license conditions, which did not include scope for scrutiny of dancer safety except where serious incidents of crime and disorder occurred.
- That within licensing there was little consideration of the welfare or working conditions of the dancers: e.g. no regulatory checks were done in terms of the facilities for workers. Dancers' safety and wellbeing were not considered in the routine scrutiny process by licensing officials, as it was not related to licensing issues.
- Some practitioners did think standards for dancers could be improved. Suggestions included; safe and secure changing areas, washing facilities, lockers for valuables, somewhere to rest between dances, facilities for making food and drinks.
- Some practitioners felt more rigorous inspection processes would perhaps improve standards, (more covert ops and CCTV surveillance) but also noted this would require more public resources and is not considered a priority.
- A code of practice document with specific enforcement guidance indicating good practice rather than being another burdensome regulatory framework was seen as potentially helpful.
- A split in enforcement responsibilities, which leaves dancers general safety and well-being potentially falling into the area which belongs to no particular agency.
- Priority for enforcers tended to be related to compliance with license conditions which did not include scrutiny of dancer safety except where serious incidents of crime and disorder occurred.

We hope the dissemination of research findings can provide practical information about dancer working conditions and raise awareness amongst Local Authorities of the issues dancers raised regarding their experiences in this workplace.

The consultation phase of the dissemination project found that a number of Local Authority Licensing Committees have now begun to consider dancer welfare, some have added licensing conditions specifically. This follow on consultation has identified a number of ways licensing could support dancer safety. These include:

- Requiring clubs to clearly display council rules in a number of places in the club: toilets, changing rooms etc.
- Requiring license holders to provide a range of information to dancers on their engagement including information about; house rules, insurance.
- Requiring clubs to provide access to adequate changing and kitchen facilities.
- Setting limits on the number of dancers related to the capacity of clubs.
- Tighter regulation on the location and design of private booths to achieve a balance between privacy and security. Requiring clubs to fit panic buttons in booths.
- Requiring owners to submit their codes of conduct, policies on house fees, commission and fining. Requiring receipts to be provided for fines, fees and commission.

#### **Examples of Good Practice**

Here are some good practice examples from Local Authorities we have already worked with:

Leeds City Council: require license holders to provide a welfare pack to new dancers and in the changing rooms. This pack must include: a copy of the Sex Establishment License, including the conditions applied by the Licensing Committee, details of any other conditions applied by management of the premises, details of how to report crime to the relevant authority, details of insurance (public liability/personal), details of unions, trade organisations or other bodies that represent the interests of dancers/entertainers, a copy of the code of practice for entertainers, a copy of the code of conduct for customers, fining policy and pricing policy.

**Blackpool Council:** has set a maximum on the number of dancers employed on any one night, this is calculated on no more than 10% of the total club occupancy. One of the criteria for assessing the suitability of applicants is that they will have policies for the welfare of dancers (including a policy to ensure dancer safety when leaving clubs), details of these must be provided. Another criteria is that license holders can be *"relied upon to act in the interests of*  the performers e.g. how they are renumerated, the facilities provided and how and by whom their physical and psychological well being is protected". Secure private changing facilities, a means to secure personal property, a smoking area separate to customers must be provided for dancers. Clubs are required to display all charges and fees for dancers in changing rooms. Details of arrangements for dancers' breaks and stewarding and dance supervisors must be provided. They must list procedures for ensuring under 18's do not work at the premises. In relation to fines Blackpool SEV's policy requires a club's codes of conduct not only details any disciplinary procedures but should include a system to ensure that performers who are sick or have a domestic emergency "are not made subject to unfair punitive financial penalties".

Manchester City Council: Manchester includes criteria for assessing suitability linked to performer welfare concerns and also requires a written policy to ensure the safety of performers leaving the club. All private booths must be fitted with panic buttons or a security alarm, booths cannot be fully enclosed and a minimum of one security staff has to be present on any floor where a performance is taking part. Secure and private changing must be provided and a separate smoking area for dancers. There are detailed requirements for CCTV systems and a trained CCTV operator is required.

#### **KEY FINDINGS: MANAGERS/OWNERS**

- Most managers/owners reported substantial drops in income and profits in recent years, up to 50% in some instances. Some reported that the number of customers had remained steady, but that they had less money to spend.
- The number of women seeking employment in lap dancing or employed as dancers was perceived as having increased significantly. Managers/owners often linked this with increasing social acceptability of lap dancing.
- Files are kept on the dancers, with details stored including things like National Insurance Numbers, home address, contact numbers, photographs.
- There were 'codes of conduct' documents or 'house rules' (signed by dancers) which seemed to function as a working contract, as they were seen to be binding. However, managers understood that no contract was in place due to the dancers being 'selfemployed'.

 Anecdotes of disorder tended to relate to customers trying to touch the dancers or behaving inappropriately towards them, trying to avoid payment, or breaching standard club etiquette after consuming a lot of alcohol.

#### What More are We Doing to Make the Research Useful?

- Producing a series of bespoke briefing papers.
- Consulting with licensing officials in a number of areas to identify feasible ways licensing processes can play a role in improving dancer safety, welfare and working conditions.
- Delivering seminars and presentations for licensing practitioners, policy makers, business owners/managers and labour organisations.
- Developing and delivering an employment rights and tax awareness educational programme for dancers, in partnership with HM Revenue and Customs
- Developing a website and smart phone application for dancers: this will provide bespoke information about self employment, paying tax and safety based on consultation with dancers
- Producing safety information and guidance for dancers in partnership with West Yorkshire Police Community Safety Team and a number supportive police forces and partner agencies
- Carrying out a systematic review of International Policy Evidence on Licensing of Sexual Entertainment

#### **Further Information:**

A summary video and a visual findings leaflet from "The Regulatory Dance" study are available here: <u>http://www.sociology.leeds.ac.uk/research/projects/r</u> <u>egulatory-dance.php</u>

For more information contact: Dr Teela Sanders <u>t.l.m.sanders@leeds.ac.uk</u> or Rosie Campbell: <u>r.campbell@leeds.ac.uk</u>

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From:

Sent: 23 April 2012 18:59

To: Entertainment Licensing

Subject: Lap dancing

I would like to point out that lap dancing clubs are legal businesses which employ many people.

I do not believ that council have a right to close down such businesses on moral grounds or because people disagree with them.

This link from Camden

http://www.whatdotheyknow.com/request/90429/response/221725/attach/html/5/APPENDIX% 20E.doc.html clearly shows crimes in the vicinity of these clubs are not high.

Please defend sexual freedom and the right to work.

33

From: Tony Newbolt [t\_newbolt@yahoo.co.uk]

Sent: 24 April 2012 08:19

To: Entertainment Licensing

Subject: SEV Licensing

I am writing to you after reading the article in the Yorkshire Evening Post on line. The letter signed by the MP and religous leaders is making a moral judgement. I am against people trying to close striptease. Economics should be the only thing that closes venues other than licensing or police views. As there is no violence associated with the venues the attempt to try and close venues seem childish and petty.

Appendix H

From:

**Sent:** 25 April 2012 17:12

To: Entertainment Licensing

Subject: Re. Lap Dancing Bars - Leeds

I wish to go on record as approving the current licensing of lap dancing bars in Leeds and to request no changes to numbers or locations.

Letters written by puritanical pressure groups should not be used to weigh the scales against these clubs. They are unobtrusive and do not expose the unaware to the 'sex industry' as it has been labeled. Eight clubs between a city of Leeds' population is hardly a ' continued proliferation ' and the arguments used against them are spurious at best and outright lies at worst.

If we are to be ruled by the moral compass of the devoutly religious, how long until gay men and women have their venues closed and are forbidden from showing affection in public? Are we really going to step backwards into the 19th century and cover the nudes in the art gallery?

I would also ask if it is ethical for a serving councilor to be touting for people to object to club licensing on her Facebook page. Is she here to serve the community, or push her own agendas onto it?

Yours sincerely





#### Sexual Entertainment Venues

These conditions may be dispensed with, added to or modified by the council. Where, in these conditions, there is a reference to the consent of the council being required, the consent may include terms, conditions and restrictions as appropriate.

#### General

- 1. Unless stated otherwise, the licence hereby granted will operate for one year from the date on the licence, after which it will cease to be in effect unless an application for renewal is submitted in the manner prescribed by the council.
- 2. The licence may be revoked by the council if at any time the holder is convicted of an offence of using the licensed premises, or other premises for which a similar licence has been granted, other than in accordance with the terms, conditions or restrictions of the licence or is convicted of any offence under any enactment defined in paragraph 1 of Schedule 4 to the Local Government (Miscellaneous Provisions) Act 1982 as amended.
- 3. The licensee will provide (subject to the satisfaction of both the police and the licensing authority), a code of practice for entertainers and code of conduct for customers, and these must be made available upon request to both the police and authorised officers.
- 4. All rules (code of practice for entertainers, code of conduct for customers, dispersal policies etc) to be prominently displayed on the premises.
- 5. Price lists will be clearly displayed at each table and at each entrance to the premises.
- 6. All rules and price lists as described in conditions 4 and 5 must be printed in a manner which is clear and easy to read during the normal operation of the premises.
- 7. Suitable and sufficient training is to be provided to all staff including the responsible person as described in condition 28. The training of all staff is to be recorded and the training record must be made available upon request to both the police and authorised officers.
- 8. The name of the premises must be approved by the council in writing. Any change to the name of the premises must be approved by the council in writing.

#### **Exhibition of the licence**

9. The licence, or a clear copy, will be prominently displayed at all times so as to be readily and easily seen by all persons using the premises, the police, the fire authority and authorised officers of the council. A copy of the conditions attached to the licence will be kept on the premises and be available for inspection by an authorised officer of the council, or the police or fire authority.

#### Hours of opening

10. The premises will only be open to the public during the following hours:

Monday	Friday
Tuesday	Saturday
Wednesday	Sunday
Thursday	

#### **Conduct on the premises**

- 11. Entertainers will only perform on the stage area, or in booths/areas for VIPs as identified on the plan attached to the licence.
- 12. Relevant entertainment will only be performed by the entertainer. There must be no audience participation.
- 13. There must be no physical contact between entertainers.
- 14. Customers will not touch the breasts or genital area of entertainers. Entertainers will not directly or indirectly touch the breasts or genital area of customers.
- 15. Any performance will be restricted to dancing and the removal of clothes. There will not be any other form of sexual activity or stimulation which, for the avoidance of doubt, includes kissing.
- 16. Sex toys must not be used and penetration of the genital area by any means must not take place.
- 17. Customers will not be permitted to throw money at the entertainers.

#### External appearance

18. There will be a notice displayed inside each entrance or doorway to the premises, clearly visible on entering the premises, which states the following:

#### Strictly No Admittance to Persons Under 18 Years of Age

This premises operates a Challenge 25 policy. Persons under the age of 25 will be required to show proof of age.

- 19. The external appearance of the premises must be approved by the council in writing.
- 20. Any change to the external appearance must be approved by the council. The operator must advise of any change in writing including a drawing of the existing and proposed street elevation. This must be approved by the council before work is undertaken.
- 21. Access to the licensed area of the premises should be through a lobby area which is constructed in such a way that the inside of the licensed premises where relevant entertainment takes place is not visible to passing members of the public when the doors of the premises are opened.
- 22. Signage will only be illuminated between 10pm and 6am, and movable signs placed outside the premises will be removed between 6am and 10pm.

#### Advertising

- 23. Any written, visual or auditory advertisement material, posters, signage or window display must not be of a sexually explicit or suggestive nature, will not contain images or text of a sexually explicit, obscene or offensive nature and must be approved by the council in writing.
- 24. Leafleting/distribution of flyers will only be permitted in such a way where it does not cause public offence. This is regulated by the paid permit system authorising distribution of free printed material issued by Leeds City Council. The licensee will remove any leaflets from the Highways within a 100 metre radius of the premises by 6am. The licensee will have a flyer distribution policy to be approved by the Council.

#### Layout of premises

- 25. No access will be permitted through the premises to any other adjoining or adjacent premises except in the case of an emergency.
- 26. No alterations (including temporary alterations) will be made to the structure and installations on the premises, without the prior written consent of the council. This condition will not require notice to be given in respect of routine maintenance works. Where there is any doubt the licensee should seek advice from the council.

#### Management of the premises

- 27. The licensee, or a responsible person nominated by him/her in writing for the purpose of managing the venue ("the manager") will have personal responsibility for and be present on the premises whilst relevant entertainment is being performed. Any such nomination will be produced on demand to an authorised officer of the council or the police.
- 28. The licensee will ensure that any person nominated by him/her under the above:a) has been provided with a copy of the conditions relating to the premises and is
  - fully conversant with them; and
  - b) is in possession of a written nomination referred to above at all times when they are in charge of and present on the premises.
- 29. The name of the person responsible for the management of the premises, whether the licensee or manager, will be displayed in a conspicuous position within the premises throughout the period during which he/she is responsible for the conduct of the premises.
- 30. Where the licensee is a body corporate, or an incorporated body, any change of director, company secretary or other person responsible for the management of the body will be notified in writing to the council within 14 days of such a change. Such details as the council may require in respect of the change of personnel will be furnished within 14 days of a request in writing from the council.
- 31. Where the licensee, director, company secretary, or responsible person nominated for the purpose of managing the venue ("the manager"), is convicted of an offence, they must, as soon as practicable after the conviction, inform the council of the conviction giving details of the nature and date of the conviction, and any sentence imposed.

- 32. The licensee will retain control over all parts of the premises and will not let, licence or part with possession of any part of the premises. The council must be notified immediately in the event that any part of the premises is affected by the termination of a lease or other event affecting the licensee's control of the premises.
- 33. The licensee will ensure that the public is not admitted to any part or parts of the premises that has not been approved by the council.
- 34. No persons under the age of 18 will be admitted to the premises.
- 35. The licensee will operate a Challenge 25 age verification policy. People under the age of 25 will be required to show proof of ID. A notice to this effect, in accordance with condition 18 will be displayed on the premises.
- 36. The licence holder will not employ any person under the age of 18 in any capacity.

#### Safety and security

- 37. A suitable CCTV system will be operational on the premises at all times when licensed activities are being carried out. The system will cover all public areas including booths and corridors but not including staff changing rooms or toilets. The system will conform to West Yorkshire Police guidelines (as attached to the licence) in respect of business related CCTV equipment. It will be adequately maintained and be capable of transporting recorded material onto removable media.
- 38. The siting of the CCTV system will be agreed with West Yorkshire Police prior to installation and will comply with that agreement at all times. Changes to the siting and standard of CCTV systems may only be made with the written consent of West Yorkshire Police.
- 39. CCTV security footage will be made secure and retained for a minimum period of 31 days time to the satisfaction of West Yorkshire Police. CCTV footage will be supplied to the police and authorised officers of the Council on request.
- 40. At all times that the premises are open to the public there will be a member of staff on duty who is conversant with operating the CCTV system and who is able to download immediately any footage requested by the police or an officer from the licensing authority or authorised agent.
- 41. Suitable numbers of Security Industry Authority registered door staff (numbers to be subject to police and licensing authority approval) will be present on the premises during the performance of relevant entertainment.

#### Staff welfare

42. Entertainers will be aged no less than 18 years.

- 43. All premises that provide relevant entertainment will be expected to provide new entertainers with a pack of information. This pack will include:
  - a) A copy of the Sex Establishment Licence, including the conditions applied by the Licensing Committee.
  - b) Details of any other conditions applied by management of the premises
  - c) Details of how to report crime to the relevant authority
  - d) Details of insurance (public liability/personal)
  - e) Details of unions, trade organisations or other bodies that represent the interests of dancers/entertainers
  - f) A copy of the code of practice for entertainers
  - g) A copy of the code of conduct for customers
  - h) Fining policy
  - i) Pricing policy
- 44. The information provided in the pack will be provided in the dressing rooms.
- 45. All booths/areas for VIPs used for private dances must be visible to supervision and must not have closing doors or curtains that prevent performances from being observed.
- 46. All booths/areas for VIPs used for private dances must be directly supervised by either a SIA registered door supervisor, or a member of staff who has direct contact with SIA registered door supervisors working on the premises at all times the booths/areas are in use. Direct supervision does not include remote supervision by CCTV.
- 47. Entertainers will only be present in the licensed area in a state of nudity when they are performing on stage or providing a private dance.
- 48. Any person on the premises who can be observed from outside the premises will be properly and decently dressed.
- 49. The licensee will ensure entertainers have secure dressing rooms, facilities to secure valuables and proper sanitation facilities available to them.
- 50. The management will maintain a register which details any fines imposed on entertainers which will include the date, type of misdemeanour and amount fined.

#### Vessels, stalls and vehicles

- 51. Vehicles will not be used to obtain custom by means of personal solicitation or touting in such a way that causes concern or offence to the public or the licensing authority.
- 52. Any vehicle used to advertise the premises must comply with the advertising conditions. All forms of advertising on vehicles must be approved by the council prior to use.
- 53. Vehicles used to transport customers to or from the premises may require a licence issued by Leeds City Council Taxi and Private Hire Licensing or the Department for Transport. Details of any vehicles brought into service must be notified to the council in writing and details of any relevant licence issued by Leeds City Council Taxi and Private Hire Licensing, or the Department for Transport must be produced in advance of the vehicle being used.

#### Variation of conditions

- 54. The council may, at the time of grant or renewal of the licence, waive, modify or vary these conditions or impose additional conditions as appropriate.
- 55. The licensee may apply to the council to vary any of the terms of the licence.
- 56. Applications to vary conditions of the licence must be advertised by the licensee in the same manner as the application for the issue, renewal or transfer of the licence.

#### **Contact details**

Entertainment Licensing Section	Phone:	0113 247 4095
Leeds City Council	Fax:	0113 224 3885
Civic Hall	Website:	www.leeds.gov.uk/licensing
Leeds	Email:	entertainment.licensing@leeds.gov.uk
LS1 1UR		