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April 24th 2012

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[1] 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.

[1] http://www.sociology.leeds.ac.uk/assets/files/research/Regulatory_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.

2. .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.

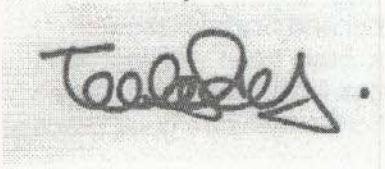
6. The research from interviews with regulators including licensing and police officers was that compared to other bar and club venues in the night time economy SEV venues were the source of very few problems or complaints in terms of public order, safety and nuisance.

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

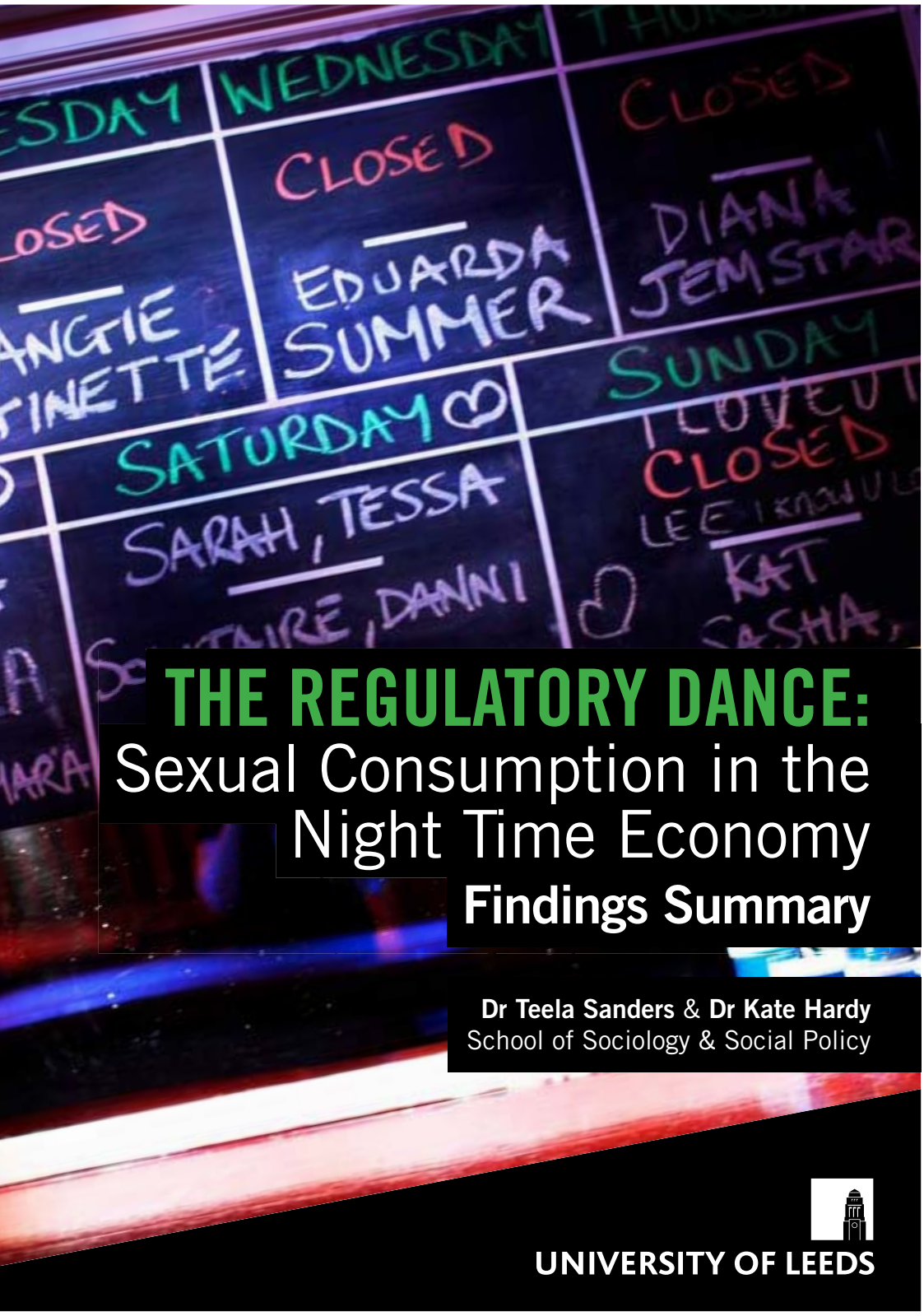
I hope that these evidence based arguments hold weight against politicised calls to close down an industry which has a long standing, appropriate and safe presence in the city.

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



Dr Teela Sanders
Reader in Sociology, University of Leeds



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

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

UNIVERSITY OF LEEDS

RESEARCH QUESTIONS & METHODS

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

Survey

197 dancers
We asked about:

- motivations and journey into dancing;
- other forms of work;
- education;
- feelings about work;
- earnings, fines and fees;
- tax;
- unions;
- advantages & disadvantages
- work patterns.

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

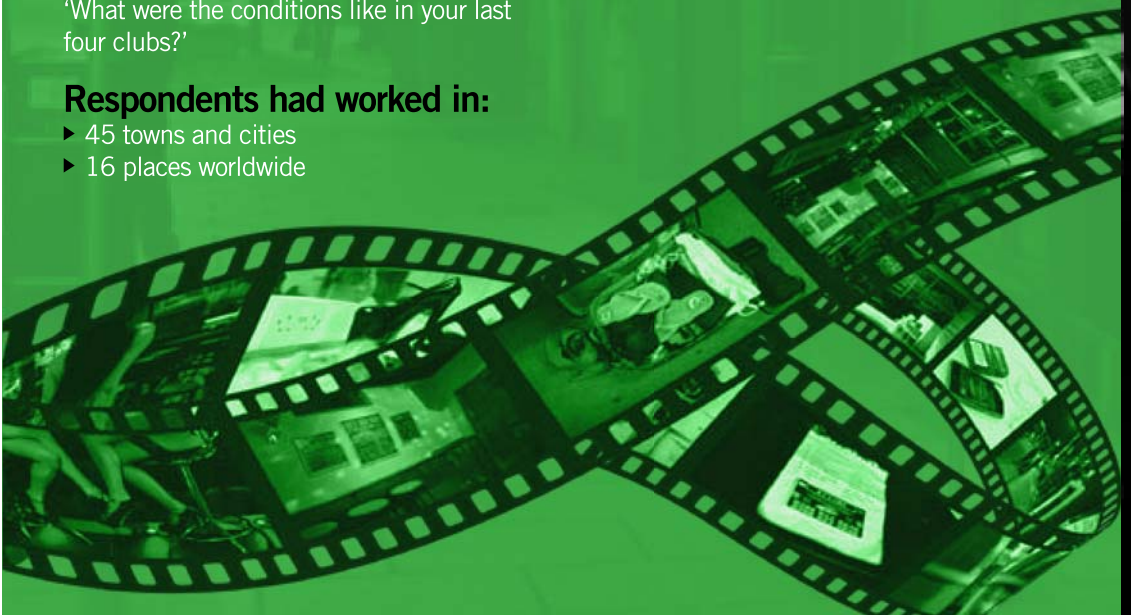
Respondents had worked in:

- 45 towns and cities
- 16 places worldwide

Interviews

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

Work 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
- 74% stated their job satisfaction as between seven and ten out of ten. No dancers said that their job satisfaction was 0-2.

FEELINGS ABOUT DANCING

Advantages

- 87.6% - choosing their hours
- 81.8% - getting money straight away
- 80.3% - earning more money than in other roles
- 76.6% - being independent
- 72.5% - combines fun and work

Disadvantages

- 59.1% - I never know how much money I will earn
- 47.4% - I have to keep my job a secret
- 40.1% - Customers are rude or abusive towards me
- 30.7% - I have lost respect for men
- 27.7% - I feel I have to compete with the other dancers

"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 always keeps you alive and I have time in work to do as I like… I am my own boss and it keeps me super fit".

"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 my job to be frequently inaccurate and judgemental".

"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 self-employed".

MONEY

House fees and commission

- Dancers had to pay house fees and commission to clubs in order to work
- Fees Range: £0-£200
- Fees Average: £80
- House fees were higher in London
- Commission range: 0%-80%
- Commission average: 30%

Fines

- 42% had been fined in their current workplace for 'rule breaking'
- 61% had been fined at least once during their time dancing
- Fines issues for chewing gum; using mobile phone; lateness; absence; taking time off; drunkenness; outfits
- Fines range: £10-£50
- Fines were arbitrary

Finances

- 70% of dancers reported losing money at some point by going to work
- 50% of dancers reported losing money in their current workplace
- 14% had had owed debts to the club
- 56% had paid NI and tax
- 83% had never had a wage slip
- 90% had never had a contract
- 96% did not pay into a pension
- 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".

FUTURE / CHANGE IN REGULATION

In 2010 the Policing and Crime Act changed the ways in which lap dancing venues are 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
- 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:

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

But many dancers feel that the current system of regulation is insufficient in protecting them and improving their conditions:

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

CONCLUSIONS

- Dancing was part of a strategy for making money whilst at the same time preparing for a different future through other forms of 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
- Verbal abuse and unwanted touch was frequently experienced but was generally dealt with by dancers, and usually supported by security and management
- 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: 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

April 2011
Photographs by Liz Lock
Project Funded by the ESRC (RES-000-22-3163)

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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 self-employed 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 self-employed".*

- *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 'self-employed'.
- 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: http://www.sociology.leeds.ac.uk/research/projects/regulatory-dance.php

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

Appendix H

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[redacted]

From: [redacted]

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

[redacted]

[redacted]

Appendix H

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[redacted]

From: [redacted]
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.

[redacted]

Appendix H

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[redacted]

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.