

**Elections and Regulatory Services**

Civic Hall  
Leeds LS1 1UR

Contact: Samantha Longfellow-Peniket  
Tel: 0113 3785029  
Fax: 0113 3367124  
Email: [samantha.longfellow@leeds.gov.uk](mailto:samantha.longfellow@leeds.gov.uk)  
Your ref: SX/SEV/00013/18/01

Date: 24<sup>th</sup> October 2018

Entertainment Licensing  
Leeds City Council  
Civic Hall  
Leeds  
LS1 1UR

Dear Sirs

**Premises: Liberte, 10 York Place, Leeds LS1 2DR.  
Application for Renewal of a Sexual Entertainment Venue.  
Licensing Authority Letter of Representation.**

Please find below an objection to the renewal application on behalf of the Licensing Authority under the Local Government (Miscellaneous Provisions) Act 1982, Section 2, Schedule 3, the Policing and Crime Act 2009, Section 27.

Complaints have been referred to the Entertainment Licensing section regarding the ages of promotional team staff members operating in Leeds city centre on an evening. Intelligence has been received that young persons under the age of 18 years have been handing out promotional flyers on behalf of Sexual Entertainment Venues (SEV) in the Leeds area.

In addition to the SEV licence granted to Liberte, the premises also benefit from a Premises Licence issued under the Licensing Act 2003. The protection of children from harm is a national licensing objective. Licensing authorities must also consider the need to protect children when undertaking licensing functions. Albeit promotional work is not a licensing function, any promotional work undertaken is ultimately for the benefit of the business, as such, it would seem reasonable that persons under the age of 18 years undertaking promotional work, whether subcontracted or otherwise, should be afforded the same safeguards as those who carry out licensing functions.

Therefore, we ask that the Licensing Sub-committee review the existing conditions attached to the SEV licence to control the activities of promotional teams operating for Sexual Entertainment Venues in Leeds and implement the suggested additional conditions to protect persons under 18 years.

Below for Members' assistance are the relevant licence conditions and additional licence condition suggestions:

**Website: [www.leeds.gov.uk](http://www.leeds.gov.uk)  
Switchboard: 0113 222 4444**

### **Current conditions;**

23. Any unsolicited 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.

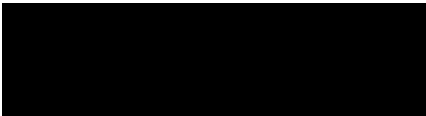
24. Staff employed or subcontracted by the premises will not verbally or otherwise promote, tout or advertise the premises, except by way of flyers. Staff employed or subcontracted by the premises will not direct potential customers to transport connected with the premises.

25. 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.

### **Suggested additional conditions;**

- When the licence holder employs a subcontractor, no person under the age of 18 years of age shall carry out work for or on behalf of the venue, whether paid or unpaid, which includes advertising promotional work such as flyering, etc.
- The licence holder will carry out age verification checks of all staff employed or subcontracted by the premises and will maintain a recorded log which is kept up to date of all checks made including the forms of identification checked. The record log shall be produced immediately on request to a police constable or officer of the Licensing Authority.

Yours faithfully

A black rectangular box redacting the signature of Samantha Longfellow-Peniket.

Samantha Longfellow-Peniket  
Senior Liaison & Enforcement Officer  
Entertainment Licensing Section