

APPENDIX B – Summary of Responses to Licensing Policy

Area of Policy	Ref	Respondent	Summary of Comments	Consideration/appraisal	Response
Section 3	3.1	Individual Respondent	The list in section 3.1 doesn't seem to include users or is it just assumed you know who they are?	Comment considered. Users would have been included in residents of Cambridge City and could respond to consultation.	Impossible to target specific users therefore no reason for a separate group be placed in the policy.
Section 5	5	Individual Respondent	I thought that to sell R18 films you have to have a sex shop licence yet section 5 makes no mention of this. Section 5.2 suggests that charity shops could sell R18 films without a licence.	Comment considered. Section 5.2 could be interrupted in this way.	Any sale of R18 films needs a sex shop licence. This has been added to the Policy for determination.
Section 9	9.1.4	Individual Respondent	9.1.4 should be deleted. Supports those making moral objections and therefore sidesteps sections 2.11 and 10.6. What would happen if a church opened adjacent to an existing establishment, would that establishment then have its licence revoked or have its next renewal refused?	Comment considered.	9.1.4 should not be deleted. No indication that objections would be received from this type of premises and that they would be on a moral basis. Policy states "not normally licence premises that are in close proximity to". This is not a definite refusal and if a church or other place of religious worship opened near a premises with a sex establishment licence, the renewal would only go to a hearing if relevant representation were received and the decision would then be based on any evidence provided.
General	2.8, 2.9	Individual Respondent	Paragraph 2.9 should be with 2.8.	Comment considered.	2.8 refers to policy being read in conjunction with other legislation. 2.9 refers to legal obligation. The two are not the same and need

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					to be separate in the policy.
General	2.11, 10.6	Individual Respondent	Comment is in regard to wording of both paragraphs and for a more positive approach to be taken.	Comments considered	Wording of both conditions to be left as it is in current policy.
Section 15	Section 15	Individual Respondent	Section on Enforcement is not clear as to how a member of the public would make a complaint	Comments considered	Section 15 gives a link to enforcement policy, which contains information on how the public can make a complaint and who to contact.
General		Darker Enterprises Limited	Document should not be called a policy as implies something of a binding nature.	Comments considered	The policy states that each application will be treated on individual merit. Being called a policy does not affect this so would leave it named as a policy.
Section 7	7.2	Darker Enterprises Limited	Add following to paragraph 7.2 "Existing licence holders during legal action following a refusal of an application"	Comments considered	A decision not to renew a licence would be taken in the normal way and the appeal process would follow the appeal guidelines. SEV, Sex Shop or Sex Cinema would not be able to trade until the appeal is heard and a decision is made. The waiver is for special circumstance, not for refused renewals. Would not amend the policy on that basis.
Section 10	10.6	Darker Enterprises Limited	Add following to paragraph 10.6 "The council is obliged to grant the renewal application unless they are satisfied that there are good reasons why it should be refused. Before	Comments considered	This would form the basis of any advice given in a committee report before

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			deciding to refuse a licence, it will be considered whether grounds for refusal can be met instead by the imposition of conditions. There is also need to be satisfied that any grounds are sufficiently serious to justify refusal i.e. that refusal of application is a proportionate response."		a hearing to renew the licence. Is not needed to be added to the policy.
Section 11	11	Darker Enterprises Limited	Add following to Section 11 "If applicable, due weight will be given to the fact that the licence has been held for a number of years previously".	Comments considered	Would not add this to the policy as the applicant would be able to bring this up at any hearing, which members could then make their decision based on the evidence presented to them.
Section 14	14.5	Darker Enterprises Limited	Amend 14.5 by removing term parties and replacing with "the applicant and the objectors".	Comments considered	Agree that the wording should be amended in the policy as per suggestion.
Section 14	14.6	Darker Enterprises Limited	Appears 14.6 has first line missing.	Comments considered	Was a typo and policy has been corrected.
Section 14	14.7	Darker Enterprises Limited	Paragraph 14.7 is incorrect. There is only an appeal to the Magistrate Court in respect of a refusal on the grounds of suitability of applicant.	Comments considered	Do not believe this to be correct. The only decisions that cannot be appealed are listed in Section 12 (1) and Section 12 (3) (a) and (c) of Schedule 3 of Local Government (Miscellaneous Provisions Act) 1982. Section 27 of the same Act covers appeals. Wording on policy amended to "Applicants have right to

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					appeal to a Magistrates Court as per Section 27 of Schedule 3 of Local Government (Miscellaneous Provisions Act) 1982.”
Nil Policy		Cambridge Rape Crisis Centre	We strongly recommend that Cambridge City Council introduce a “nil” policy for Sexual Entertainment Venues	Comments considered.	This was raised in 2011 when the policy was first being considered. At that time, two other local authorities were put forward as examples as ones that had adopted a “nil policy”. These were City of London and London Borough of Hackney. Before both adopted a “nil policy”, an extensive and comprehensive consultation was carried out. The cost of the City of London consultation was stated at costing £30,000. Harrow Council and Haringey Council have both adopted “nil policies” as well. None of the four policies have been reviewed since 2011. Cambridge City Council decided against starting a consultation into adopting a nil policy and adopted

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					<p>the current policy. Cambridge City has only one licensed sex shop and since 2011 no new applications have been received for SEV's or Sex Shop and Cinema's. Without undertaking an extensive and expensive consultation, a "nil policy" could not be adopted. Section 9.1 and 9.2 takes into account the location of any application for a licensed premises. Section 13.4 makes reference to not having a nil policy but the policy can be reviewed at any time. Recommendation is to adopt the amended policy without a nil policy. No evidence has been provided that Cambridge City would benefit from or needs a nil policy.</p>
Gender Equality		Cambridge Rape Crisis Centre	We strongly recommend that you explicitly include "the promotion of gender equality" as a specific objective for Sex Establishment licensing in your licensing policy.	Comments considered	The Council will have due regard to the public sector equality duty which came into force on 5 th April 2011.
Conditions of Licence		Cambridge Rape Crisis Centre	Strongly recommend that a comprehensive set of standard conditions are applied to such licenses in order to help protect	Comments considered	A number of the suggested conditions have already

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			women in this community.		been adopted in Appendix B of the policy.
Exemption		Cambridge Rape Crisis Centre	We further request that you monitor the impact of the "frequency exemption" which was included with the SEV licensing regime.	Comments considered	It is difficult to see how this can be monitored if the council is not required to be informed of such events. We are unaware of the number held since 2011 and unaware of complaints being raised. If an event of this nature received a complaint, we could monitor and address the situation.
General		Cambridge Rape Crisis Centre	We recommend that the Sexual Establishment Licensing Policy requires members of licensing sub-committees who wish to sit on hearings of relevance to gender (i.e. SEVs' sex establishments and so on) to have completed up to date basic training in gender equality and equality legislation.	Comments considered	All councillors receive basic training in equality matters.
General		Cambridge Rape Crisis Centre	We recommend that, in the absence of legal direction to the contrary, the Licensing Committee maintain a register of interested parties in reference to SEVs, sex establishments and so on, who will be informed by the Licensing Committee when applications are received of potential relevance for gender equality. This will ensure that the Council will be seen to fulfil its obligations to operate in a transparent and accountable manner.	Comments considered	The methods of advertising applications are set out in the legislation and do not provide for a register of interested parties. However we will inform the public of all applications by means of publishing a register on the licensing section of the council's website.
General		Cambridge Rape Crisis Centre	The working party of officers and councillors is at least equally gender balanced.	Comments considered	Neither legislation nor guidance require

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			The policy should make reference to good practice in SEV applications being heard by sub-committees that are at least equally gender balanced.		gender balanced sub committees. The licensing sub committee currently has 12 members, 8 male and 4 female. Any hearing will be heard in front of 3 members.
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Luke Catchpole

From: Simon Geard [REDACTED]
Sent: 19 July 2016 18:15
To: licensing
Subject: Give your feedback on our review of our Sex Establishment Licensing Policy

Follow Up Flag: Follow up
Flag Status: Completed

Here is my feedback as requested.

- 1) The list in section 3.1 doesn't seem to include users, or is it just assumed you know who they are?
- 2) I thought that to sell R18 films you had to have a Sex-Shop licence yet section 5 makes no mention of this, does that mean there is no special requirement to sell R18 films - or is that covered under other licensing regulations? For example it would good if charity shops were able to sell R18 films without a licence - section 5.2 suggests implies this will become possible, is that correct?
- 3) I strongly believe that section 9.1.4 should be deleted. We live in a secular society and as such churches should have no special privileges over any other establishment. Certainly you could have a requirement about any outward display being suitably discrete but the inclusion of 9.1.4 is effectively supporting those making moral objections and therefore side-steps sections 2.11 and 10.6. What would happen if a church opened adjacent to an existing establishment, would that establishment then have its licence revoked or have its next renewal refused?

Regards,

Simon Geard

Luke Catchpole

From: David Blake [REDACTED]
Sent: 30 May 2016 15:32
To: licensing; David Blake
Subject: Review of our Sex Establishment Licensing Policy

Follow Up Flag: Follow up
Flag Status: Completed

Sir,

The revised draft policy document is well written and my comments are limited to:

1. Para 2.9. There does not appear to be a reason why the content of para 2.9 is in a separate paragraph. If there is a need, then sexual discrimination, which is more pertinent, should have a separate paragraph.
2. Para 2.11. " We do not take a moral stand in adopting this policy". Unless the Council is permitted to take a moral stand, as parliament has made it lawful to operate a sex establishment, the text in italics should not be included. Para 10.6 states that moral objections are outside the scope of the 1982 Act. I would suggest a more positive approach to say you will follow the existing law.
3. Enforcement. It is not clear how a member of the public for example, would make a complaint against an establishment should a licence be granted.

Regards

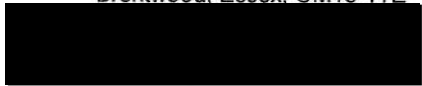
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David Blake

[REDACTED]

Darker Enterprises Limited

Licensing Administration
Unit 3, Chancerygate Business Centre,
33 Tallon Road, Hutton,
Brentwood, Essex, CM13 1TE



Licensing Team
Environmental Services
PO Box 700
Cambridge
CB1 0JH

5th August 2016

Dear Sir/Madam,

Cambridge City Council public consultation – Review of Sex Establishment Licensing Policy

As the holder of Sex Shop licence, we submit our comments in respect of this as requested.

Our first submission is that the document should not be called a policy despite the contents of Paras. 2.3 and 2.4. This terminology implies something of a binding nature. As each and every application under the Local Government (Miscellaneous Provisions) Act 1982, Schedule 3 must be considered on the situation 'at the time the application is made', a pre-determined policy might be considered a fetter on the decision making process. We would submit that the use of the words 'guidelines' would be preferable to policy. It would be less acceptable, but slightly clearer, if the term 'policy guidelines' were used instead of 'policy'.

We also make some specific comments below.

In Para 7.2, we suggest that the following be added:

- *Existing licence holders during legal action following a refusal of an application.*

This would ensure that any licensee challenging a decision could continue trading pending a final decision (but it would not permit the sale of R18 Videos).

In Para 10.6, we suggest that the following be inserted **after** the first sentence:

The Council is obliged to grant the renewal application unless they are satisfied that there are good reasons why it should be refused. Before deciding to refuse a licence, it will be considered whether grounds for refusal can be met instead by the imposition of conditions. There is also need to be satisfied that any grounds are sufficiently serious to justify refusal i.e. that refusal of the application is a proportionate response.

This is a summary of advice previously given by the Officers of the Council which clarify the obligations of the decision-makers.

In Section 11- **Determining Applications**, we would ask that the following be incorporated:

If applicable, due weight will be given to the fact that the licence has been held for a number of years previously

This reflects the statement of the Court of Appeal to this effect.

Para 14.5 reads:

The Licensing Sub-Committee will communicate their decision at the end of the hearing and all parties will receive written confirmation of the decision within seven days.

objections have been submitted and accepted, we aim to determine an application within 20 working days from the close of the 28-day period for receiving objections.

We submit that the use of the Term 'Parties' may give the impression that the hearing is between parties. The Courts have held that this is not the case. We suggest that 'all parties' be amended to read 'the applicant and the objectors'.

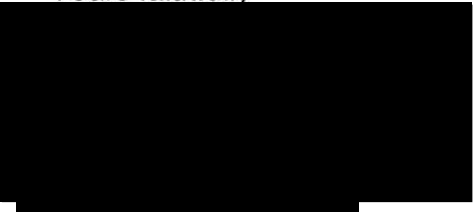
There seem to be a line missing as there is no Para 14.6 and the sentence beginning 'objections' (line 3) does not make sense.

Para 14.7 is incorrect. There is only an appeal to the Magistrates Court in respect of a refusal on the grounds of suitability of the applicant.

Finally, we note that there is no reference to the basis upon which fees are determined. Given the current case referred by the Supreme Court to the European Union Court of Justice, it is likely to be of importance that a council can demonstrate the basis upon which the fees are set.

We trust the foregoing is clear, but if you have any questions, we will be happy to answer them

Yours faithfully



Licensing Admin
For & on behalf of
Darker Enterprises Limited

Licensing and Enforcement team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH.

8th August 2016

Dear Licensing and Enforcement Team

Re: Response to Cambridge City Council public consultation - Draft Sex Establishment Licensing Policy

Thank you for informing us of your public consultation on the Cambridge City Council's Draft Sex Establishment Licensing Policy. We participated fully in the last consultation on the Council's draft policy in 2011 and our view on the matter has not changed as outlined in our response to the current consultation below.

We strongly recommend that Cambridge City Council introduce a 'nil' policy for Sexual Entertainment Venues, as permitted under Schedule 3 of the Local Government (Miscellaneous Provisions) Act (LGMPA) 1982 and amended by Section 27 of the Policing and Crime Act (PCA) 2009.

The introduction of a nil policy on the granting of SEV licenses is perfectly permissible under the LGMPA (1982), as amended by the PCA (2009). Indeed, the statute specifically contemplates this option. As **Philip Kolvin QC, chair of the Institute of Licensing** states: "...the provision gives the authority a high degree of control, even amounting to an embargo, on sex licences or particular types of sex establishment, within particular localities. The width of the discretion is consolidated by the absence of any appeal against a refusal on this ground."¹

The introduction of a nil policy has been adopted by a number of local authorities including; by the London Boroughs of Hackney, Harrow Council and Haringey. In the view of Hackney council SEVs:

*"...contradict and undermine its stated aims and exacerbate the challenges it faces in bring about positive, genuinely sustainable characterful and thriving neighbourhoods which support the need and principle of upskilling its population and closing the education gap across its communities."*²

In Haringey, Councillor Nilgun Canver states: "This new legislation allows us to stop lap dancing and pole dancing clubs from setting up in sensitive areas where they will cause concern. We

¹ Kolvin, P. (2010) *Sex Licensing*, The Institute of Licensing, p.60

² Hackney Draft Sex Establishment Licensing Policy, 2010

consider this would apply to every ward and want this to be central to our policy. We are asking for comments from residents, to see if they support this stance³."

We are aware that some lap dancing club operators have threatened to appeal against the rejection of a Sexual Entertainment Venue (SEV) licence on the grounds that it violates their human rights under the Human Rights Act 1998 and that the two rights they threaten to invoke are the *right to freedom of expression* and the *protection of property*.

However, it is extremely unlikely that such an appeal would be successful considering that it is within the law for councils to set nil policies.

Furthermore, the two rights specified above are qualified, they are not absolute. **Philip Kolvin QC, Chairman of the Institute of Licensing**, states⁴:

"Where a rational decision has been taken by the licensing authority in accordance with the principle of the statute, it is most unlikely that the decision will be held to have been a disproportionate interference with human rights."

Indeed, before the Policing and Crime Bill became law – enabling local authorities to licence lap dancing clubs as Sexual Entertainment Venues under the LGMPA - the **Minister of the Crown** in charge of the Bill made a **written statement that the new law, including the provision to set nil policies, was compatible with the Human Rights Act 1998.**

Thus the power of local authorities to set a nil policy for Sexual Entertainment Venue licenses has been validated in human rights terms.

The reasons for introducing a nil policy are outlined below as factors the City Council should take into account in developing policy concerning the number and location of SEVs.

GENDER EQUALITY

We strongly recommend that you explicitly include 'the promotion of gender equality' as a specific objective for Sex Establishment licensing in your licensing policy.

The Equalities Act 2010 legally requires local authorities to promote equality between women and men in all that they do. The Equalities Act and associated duties are particularly relevant in relation to the licensing of sex establishments because of the gendered nature of sex establishments like lap dancing clubs, and because of the negative impact that lap dancing clubs have on efforts to promote equality between women and men. The negative implications of lap dancing clubs on women are outlined below:

Lap dancing clubs normalise the sexual objectification of women in contradiction to efforts to promote equality between women and men.

The links between objectification, discrimination and violence against women are recognised at the international level by the legally binding United Nations Convention to Eliminate Discrimination

³ http://www.haringey.gov.uk/index/news_and_events/latest_news/lap_dancing_ban.htm

⁴ Kolvin, P. (2010) *Sex Licensing*, The Institute of Licensing, p82

Against Women (CEDAW), which has repeatedly called on states – including the British Government - to take action against the objectification of women⁵. Similarly the UK-based End Violence Against Women coalition has called on the UK Government to tackle the sexualisation of women and girls because it provides a 'conducive context' for violence against women⁶.

Lap dancing clubs are a part of the sex industry and as such are linked with wider systems of prostitution

Research shows that the structural conditions of lap dancing clubs, where women compete with one another for private dances, lead to some dancers offering sexual services to survive financially⁷, a climate in which, according to an ex-lap dancer: 'No touching, not exposing your genitals, not allowing men to touch you is the exception rather than the rule.'⁸

Even if a club enforces a no touching rule and there is no sexual contact between dancer and customer, research further shows that strip clubs increase demand for nearby prostitution services⁹. This places lap dancing on a continuum of commercial sexual activity, irrespective of whether this sexual exchange occurs within the club itself.

Lap dancing clubs have a negative impact on women's safety in the local vicinity

Research undertaken in the London Borough of Camden found a fifty percent increase in sexual assaults in the borough after the rapid expansion of lap dancing clubs¹⁰. Personal testimony from women collected by human rights organisation OBJECT reinforces the idea of a link between the proliferation of lap dancing clubs and increased levels of sexual harassment for women in the vicinity:

'On separate occasions, I have had men say to me "How much for a dance love? I'll give you £20 to get yours out,"... they seem to always think that because they can pay to degrade and abuse women inside the club that I am no different'¹¹

The UK Royal Institute of Town Planning has further drawn attention to concerns regarding the impact of lap dancing clubs on women in the local areas: 'Evidence shows that in certain locations, lap dancing and exotic dancing clubs make women feel threatened or uncomfortable'¹².

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

Lap dancing clubs normalise the representation of women as being always sexually available and this is worrying in light of widespread public opinion that women are in some way responsible for sexual assaults perpetrated against them. The links between the expansion of lap dancing clubs and an increase in the levels of sexual violence have been raised by organisations who work with victims and perpetrators of gender-based violence. For example, as **Chair of Rape Crisis**

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

⁶ Realising Rights, Fulfilling Obligations: An Integrated Strategy to End Violence Against Women (EVAW) 2008

⁷ Bindel, J. (2004) *Profitable Exploits: Lap Dancing in the UK*, London Metropolitan University, Child and Women Abuse Studies Unit (CWASU)

⁸ 'Elena' quoted in 'I was an Object, not a Person, The Guardian 19.03.08

⁹ Coy, M, Horvath, M & Kelly, L (2007) *It's just like going to the supermarket: Men talk about buying sex in East London* London: Child and Woman Abuse Studies Unit

¹⁰ Eden, I. (2003) *Lilith Report on Lap Dancing and Striptease in the Borough of Camden*, London: The Lilith Project, Eaves Housing for Women

¹¹ See www.object.org.uk for testimonies

¹² Royal Town Planning Institute (2007), *Gender and Spatial Planning, Good Practice Note 7*, 10 December 2007

England and Wales Nicole Westmarland reported that lap dancing clubs *'both support and are a consequence of sexual violence in society'*. This view is reiterated by the Director of the **White Ribbon Campaign**, an organisation which works with men to end violence against women: *'Any expansion of lap dancing clubs feeds an increase in the lack of respect for women'*¹³.

Furthermore, in response to research it commissioned into the impact of lap dancing clubs on the city, **Glasgow City Council**¹⁴ stated:

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

We call on Cambridge City Council to adopt a nil policy in relation to SEVs for the reasons given above. However, if you do not adopt a nil policy and SEVs are to be granted and/or renewed, we strongly recommend that a comprehensive set of standard conditions are applied to such licenses in order to help protect women in this community.

Philip Kolvin QC, Chairman of the Institute of Licensing, has produced a set of suggested conditions for application to SEV licenses¹⁵. We would like to draw particular attention to the importance of introducing the following conditions:

1. No contact between performers and audience and a minimum of 1 metre separation between performers and audience
2. Performers confined to stage area
3. Prevention of fining performers
4. Zero tolerance policy on customers who break rules of conduct. Contravention warrants a lifetime ban from the premises
5. Prohibition of private booths
6. CCTV coverage of all public areas
7. Controls on exterior advertising and signage
8. Prohibition of advertising in public spaces, including on billboards, telephone booth boards, and leafleting

We also recommend you include the conditions outlined by the Bristol Fawcett Society:

- A register to be kept of all staff working each night and valid proof to be held on the premises of the age of each of the performers

¹³ Both quotes are from an OBJECT leaflet 2008

¹⁴ Glasgow City Council report on the need for review of licensing legislation in the light of concerns re table dancing
<http://www.glasgow.gov.uk/NR/rdonlyres/0D19236F-808A-4467-96F7-6A9508C1F312/0/legtablic2.pdf>

¹⁵ Kolvin, P. (2010) *Sex Licensing*, The Institute of Licensing, p.74

- No fee to be charged by any club to a performer for working in the club
- Police to be kept informed of any assaults that take place on staff, whether or not the victim wishes to press charges
- No 'smoking areas' to be allowed at the front of clubs to minimise the potential for harassment of women living, working and passing through the area. All smoking areas must be in private areas away from public spaces.
- No advertising allowed in media that is not exclusively aimed at adults – this would exclude local 'family' newspapers for example.

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

We further request that you monitor the impact of the 'frequency exemption' which was included within the SEV licensing regime.

As you will be aware, this exemption means that establishments hosting lap dancing less than 12 times in a year do not require an SEV licence or even a temporary event notice. We are extremely concerned about this exemption because you will have no powers to prevent these performances from occurring in Cambridge or place any conditions or controls on them. Yet venues hosting lap dancing less than once a month are less likely to have facilities and procedures in place to protect the safety of performers – such as a separate changing room, CCTV and security. The safety of the performers is thus put at risk by this exemption.

We therefore ask you to attempt to monitor performances that are staged under the frequency exemption and to convey your experiences of this back to the Government.

This is crucial because the power to amend or repeal the frequency exemption was included in the Policing and Crime Act 2009 in recognition of the fact that the frequency exemption could prove problematic for local authorities.

We recommend that the Sexual Establishment Licensing Policy requires members of licensing subcommittees who wish to sit in hearings of relevance to gender (i.e. SEVs; sex establishments and so on) to have completed up to date basic training in gender equality and equality legislation.

We recommend that, in the absence of legal direction to the contrary, the Licensing Committee maintain a register of interested parties in reference to SEVs, sex establishments and so on, who will be informed by the Licensing Committee when applications are received of potential relevance for gender equality. This will ensure that the Council will be seen to fulfil its obligations to operate in a transparent and accountable

manner. (This will not be an onerous obligation as relevant applications are estimated to be around one a year, currently).

While it is true that both men and women have been active in making representations about the negative impact on society of SEVs, it is also true that the majority of those who reflect and take action on the harm of SEVs are women. This could be because the lived experience of sexual objectification, sexual discrimination, sexual harassment and sexual violence in many women's lives plays a part in the extent to which these issues are given serious consideration and weighed against other interests or values in the context of SEV licensing.

Therefore we request and recommend that:

- **The working party of officers and councillors is at least equally gender balanced**
- **The policy should make reference to good practice in SEV applications being heard by sub-committees that are at least equally gender balanced.**

We would very much appreciate receiving written reports of any decisions taken pertaining to the recommendations that we have set out in this document.

Yours sincerely

Norah Al-Ani
Development Officer
Cambridge Rape Crisis Centre