

SEVs & EIAs

Strip Clubs are Incompatible with Equality Law

| Cannot Be Prevented | |
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| ✗ | Abuse & Exploitation by Management |
| ✗ | Sexual Contact |
| ✗ | Harassment & Assault by Punters |
| ✗ | Psychological harm to Lap Dancers |
| ✗ | Women in Vicinity feeling Unsafe |
| ✗ | Directly Feeding Prostitution |
| ✗ | Harm to Women in Wider Society |

Summary

Councils are legally bound by equality law to seek to ‘foster good relations’ between the sexes and ‘eliminate harassment, victimisation and discrimination’ of women and girls. This evidence-based document shows it is impossible to do this whilst licensing the strip industry:

- 1. INHERINT HARM:** The Industry is Inherently anti-equalities
- 2. INDUSTRY NORMS:** The reality of how the industry really operates is anti-equalities
- 3. REGUATLION:** How Regulation is Circumvented
- 4. CLOSING CLUBS:** Is not anti-equalities

Recommendations to Councils

- 1. Cease issuing licenses for stripping to venues currently operating as strip clubs**
- 2. Do not issue new stripping licenses to new venues**
- 3. Create a policy for zero strip clubs (SEVs), including where venues currently operate**
- 4. Support all women from the industry with appropriate practical and mental health support**

Additional Key Information

- [Still Stripping the Illusion](#) – an Overview of the industry
- [Strip Clubs and the Law](#)
- [Not Buying It website](#) – a wealth of information on the facts and myths

About Not Buying It

[Not Buying It](#) are expert in the reality and harms of the strip industry, SEV licensing and PSED legislation. Our CEO helped bring in SEV legislation to end the licensing of strip clubs as leisure venues. We have since been involved in several successful High Court challenges showing councils breach equality law by adopting a pro-strip industry stance.

We have collated an extensive body of evidence – including whistle blower testimonies and international research – on the multiple harms of the strip industry.

A Quick Note

Councils are legally obliged to abide by equality law, or The Public Sector Equality Duty (PSED):

The PSED

The PSED states councils must 'take due regard' to:

- 'Seek to eliminate harassment, victimisation and discrimination' of women/girls
- 'Foster good relations' between the sexes

The PSED applies to:

- Women working in strip clubs
- Women and girls in the vicinity of strip clubs
- Women and girls in wider society (wider social attitudes)

The strip trade has taken to arguing that since it is legal to license strip clubs, councils are 'over reaching' by refusing to do so on the grounds of equality – that this is a matter for Parliament. We would remind councils that it is equally lawful *not* to license strip clubs. Further, equality law 'bites' particularly hard with regard to the sex industry. There have also been several test cases showing:

- **Councils *must* consider equality law even in wider society**
- **Councils cannot dismiss harm-based concerns as 'moralistic'**

We would also remind councils that, equality matters aside, they have sweeping powers to refuse to license strip clubs merely on the grounds of locality.

- Read more on about the law here: **Strip Clubs and the Law**

We have analysed the impact on equality with regard to:

1. **Inherent harm** - of the industry (even if it operated according to regulation)
2. **Industry Norms** - The harm of the industry as it *actually* operates
3. **Regulation** – how all regulation is circumvented
4. **Removing Licenses for Stripping** - Closing strip clubs complies with equality law

Key to Table

- Cannot be prevented, regulated or made compatible with the PSED
- Potentially could but can still be readily circumvented
- Can be regulated, prevented or made compatible with the PSED

1. INHERENT HARM

In this section we outline the inherent harm of the industry, even if run according to all regulations. These harms are intrinsic to the strip industry. This means they cannot be prevented or even reduced. It means strip clubs are inherently harmful. How then can councils *not* be in breach of equality law (and often safeguarding and criminal law) by licensing them?

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| | 1.1 Inherent Harm for Lap Dancers |
| | The entire premise of strip clubs is based on: |

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| | <p>Objectification. Psychologists describe being objectified or objectifying yourself as so harmful that it can be seen as a form of trauma. This is the case, regardless of whether a woman chooses to objectify herself.</p> <p>Split personas/Emotional Dissonance. The very nature of lap dancing requires women to continuously feign emotions (interest and desire) in customers whilst suppressing others (boredom, disgust and often anxiety and fear). It is only by doing this that women can carry out their job. This includes:</p> <ul style="list-style-type: none"> • Visual Acts (stripping, sexual performances, exposing genitals and anus - as allowed under licensing conditions) • Sexual Acts (the sexual touching and contact that is standard in the industry although not allowed) • Psychological Acts (spending time, often hours, behaving sexually, 'flirting' and providing 'the girlfriend experience' – allowed). <p>All this leads to harmful emotional dissonance and a slew of other mental health issues which Councils is unavoidably creating by issuing stripping licenses.</p> |
| References | <ul style="list-style-type: none"> • Mental and Physical Health Issues of Women in Lap Dancing |
| | <h2>1.2 Fostering Poor Relationships between the Sexes</h2> |
| | <p>Strip clubs foster poor relationships between the sexes by their very nature (as well as within the sexes, ie <i>between</i> women).</p> <p>Fostering poor relations between the sexes is a direct breach of the PSED yet this is inherent to the industry so cannot be prevented through regulation. Councils must clearly demonstrate they have taken this into consideration in strip club licensing and policy decisions and justify how they can balance enabling the industry when this aspect of it which so directly violates the PSED.</p> |
| | <p>Lap Dancers' views of Men:</p> <p style="text-align: right;">'I truly resented those men most of the time' Sarah Kat</p> |

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| | <ul style="list-style-type: none"> - Survivors testify how they can no longer have relations with men, cannot trust men or have learnt to see them as ‘walking cash machines’ - One study found 30% of lap dancers had ‘lost all respect’ for men. |
| References | <ul style="list-style-type: none"> • Survivor Testimonies |
| | <p>Promoting Poor Relations between Women:</p> <p>‘Camaraderie .. that’s not my experience, nor my fellow lap dancers’ Sarah Kat</p> <p>‘Management purposefully perpetrated an atmosphere of intense competition’ Alexandra</p> <ul style="list-style-type: none"> - Due to employment and work conditions and other factors, a culture of intense competition is generated between lap dancers as they must compete with each other to garner the favours of punters and often management, security and other staff. - This is so intense that it has resulted in several incidences of assaults between lap dancers - It should be noted that very few incidences will ever be reported and often competition will not bubble over into assault, this does not mean that poor relations are not being promoted. <p>We outline in Section 2.8 why the claims of those in the industry of ‘strong camaraderie’ cannot be taken at face value.</p> |
| References | <ul style="list-style-type: none"> • Examples of actual assault between lap dancers: Aberdeen, Carlisle, Preston • Survivor Testimonies |
| | <p>Punters’ Views of Lap Dancers and Other Women:</p> <p>‘It’s great to have that kind of power and control’ Punter</p> <p>‘Men need somewhere where they can act like they want’ Punter</p> <p>‘It’s like buying a piece of meat’ Punter</p> |

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| | <p>Most concerning are the attitudes towards lap dancers, and indeed all women, promoted in customers as it is these attitudes that lead to sexual discrimination and abuse both of lap dancers and of women in wider society.</p> |
| <p>References</p> | <ul style="list-style-type: none"> • The Gentlemen in the Club • Wider Attitudes – punters, rape, domestic abuse, misogyny |
| | <h3>1.3 Anti Equalities Employment Practices</h3> |
| | <p>The nature of employment within the strip industry demonstrates clear sex-based discrimination and is anti-equalities. This is unacceptable in itself. In addition, it contributes to an exploitative culture where rule-breaking, prostitution, harassment and abuse become normal.</p> <p>Lap dancers are self employed:</p> <ul style="list-style-type: none"> • With no Employment Rights • Are in debt before even starting a shift as have to pay the club up front to work in it (this can be £150 or more, a significant sum for many) • Must outlay considerable sums for each shift. This includes personal grooming - hair, make up, expensive ‘stripper’ clothes and shoes (sometimes bought from the club) as well as taxis home in the early hours of the morning • Are not paid for the hours worked • Can work for free with have no guarantee of income • Only make a penny when bought for a private dance with a punter • Clubs always have too many lap dancers to punters, making it hard to secure private dances (so women might not break even, let alone make money) • Clubs take a percentage cut from each private dance • There are frequent fines (these can be £200 or more) ‘you are fined for chewing gum or ‘not smiling enough’ • 70% Lap dancers have lost money by going to work • It is not uncommon for women not to be paid the money they actually do make • All other staff (mostly male) are employed with rights and guaranteed income • Unlike female strippers, male strippers are employed and paid (well) |

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| | <p>Councils can introduce measures in an attempt to mitigate some of these issues (such as banning fines, telling clubs to pay women money earned or requiring a maximum number of lap dancers allowed each night). However, these measures cannot be taken as meaningful since there is no independent means of verification. Councils have to rely on the ‘say so’ of clubs and workers – with a highly vested interest to keep the club’s license and deny any issues.</p> <p>Section 2.8 explains why this cannot be taken at face value</p> <p>Council licensing frequently state it has little or no say over workplace practices. If that is the case, Councils must clearly demonstrate they have taken these anti-equalities employment practices into consideration in their strip club decisions and justify how they can enable an industry whose employment model is so highly anti-equalities.</p> |
| References | <ul style="list-style-type: none"> • How the Industry really operates: Cassy, Sarah Kat, Video of testimonies • Examples of non-payment of earnings: Aberdeen, Manchester, Edinburgh, Leeds, Preston, Multiple clubs |
| | <p>1.4 Fear of Abuse in the Vicinity & Self Exclusion</p> |
| | <p>A large body of research and testimonies show that many women fear abuse or feel highly uncomfortable in the vicinity of a strip club. This can be so severe that many women ‘self exclude’ - avoid the area entirely. This occurs regardless of whether the club is open or has overt signage. Yet such self exclusion can be seen as a breach of women’s human rights to free movement.</p> |
| References | <ul style="list-style-type: none"> • Strip clubs create ‘No Go’ Zones |
| | <p>1.5 Punter Abuse in the Wider Vicinity/Wider Society</p> |
| | <p>Numerous women also report harassment, abuse and assault in the vicinity of strip clubs. Although it might be theoretically possible to prevent abuse <i>in the immediate vicinity</i> of strip clubs (due to CCTV and security), it is impossible to prevent harassment and assault by punters in the wider vicinity or in wider society.</p> |

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| | <p>If men are prevented from abusing women in the immediate vicinity of a strip club due to security measures, abuse can simply be displaced elsewhere. This could include their partners at home. Or women in the local brothel that they are now more likely to visit. Strip club punters are noted to be particularly aggressive and abusive here”:</p> <p style="text-align: center;">“The fact that they’d come from lap dancing clubs meant they’d already stopped seeing as human” Anon, Women in Prostitution</p> <p>The dangerous combination of drink/drugs, arousal and sexual entitlement makes it that much more likely that strip club punters will be abusive towards women.</p> <p>Indeed the mere objectification of women is linked to severe intimate partner violence, whilst male entitlement is the most common motivator for rape.</p> <p>This cannot be mitigated and cannot even easily be measured.</p> |
| References | <ul style="list-style-type: none"> • Strip Clubs and Wider Attitudes |
| | <p style="text-align: center;">1.6 Promoting Harmful Attitudes in Wider Society</p> |
| | <p>Society’s acceptance of men’s sexual buying of women goes hand-in-hand with wider misogynistic attitudes.</p> <p>Strip clubs reinforce wider misogyny, voyeurism, the dehumanisation of women and male dominance in wider society.</p> <p>The mere presence of strip clubs and its normalisation on the High Street means Councils are signalling to all that it is absolutely acceptable for men to buy women. The suggestion that the only real issue is regulation ignores the inherent harm of promoting the sexual buying of women.</p> |
| References | <ul style="list-style-type: none"> • Strip Clubs and Wider Attitudes |

2. INDUSTRY NORMS

In this section we outline how the strip industry *acutally* operate, irrespective of any regualtion in place, and the multiple harms this entails. Councils cannot ignore this evidence and assume that their clubs somehow function differently from the industry standard. If they do, they are putting women at risk. They could also be challenged for breaching equality legislation - and potentially enabling brothel keeping and other forms of criminality.

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| | <h3>2.1 Sexual Contact & Touching</h3> |
| | <p>'I had no idea how extreme the sexual contact would be' Milly 'Men pay you to get naked and grind on their crotch' Lucy</p> <p>Sexual touching is standard in the industry. A lap dance invariably involves women rubbing men's genitals, often for prolonged periods, and straddling customers to 'grind' on their crotch. Women also frequently touch themselves (or each other) sexually, including intimately. This is so widespread that it is almost inconceivable that a strip club exists where this is not the case.</p> <p>This is evidenced by research, dozens of whistle blower testimonies, numerous undercover visits and occasionally when the police (rather than the council) inspect CCTV.</p> <p>This can be so extreme that copious sexual touching (including masturbation and oral sex) have been shown at even the most renowned, respected and 'stringently regulated' strip clubs such as Spearmint Rhino and The Windmill Theatre.</p> <p>It is notable that when rules to prevent straddling and 'touching men below the waist' were introduced by Swindon council they were met with uproar by strip club operators</p> |

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| | <p>and lap dancers alike. Similarly when rules against sexual contact were introduced by Camden council, it was challenged in court (unsuccessfully) by the Secrets chain.</p> <p>When considering strip club licensing and policy, Councils must show how they have taken into consideration the abundant evidence that sexual contact is the industry norm, the evidence that regulation does not prevent this, that it is denied by those in the industry and the evidence that these breaches are rarely detected.</p> |
| References | <ul style="list-style-type: none"> • Compilation of evidence exposing sexual contact as the industry norm |
| | <h2 style="text-align: center;">2.2 Abuse By Punters</h2> |
| | <p>Verbal, physical and sexual abuse, harassment and assault of lap dancers is standard.</p> <p style="text-align: center;">‘I can’t remember the number of times I was called a piece of shit’</p> <p style="text-align: center;">‘There is constant abuse’</p> <p style="text-align: center;">‘sexual assault is a daily occurrence’</p> <p>Studies suggest up to 100% of lap dancers experience abuse within clubs. Testimonies from survivors reinforce this.</p> <p>Violence against women working in strip clubs is so common place that a Scottish judge has stated ‘strippers knowingly undertake the risk of violence and abuse’.</p> <p>It must be remembered very little of the abuse that takes place is ever detected, reported or believed. When it is, it is routinely dismissed and excused as ‘exceptional’.</p> <p>Councils must properly consider the abundant evidence that abuse by punters is the industry norm. The must equally appreciate that this is rarely reported, rarely detectable and that statements refuting this in clubs by management/staff are unreliable.</p> <p>Councils need to ask themselves how they can reconcile this with the licensing of a strip club whilst complying with basic health and safety standards, let alone equality law.</p> |
| References | <ul style="list-style-type: none"> • Punter abuse in strip clubs |

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| | 2.3 Abuse by Management/Owners/Staff |
| | <p>Club owners, management and other staff are also often significant and ongoing sources of abuse – both against lap dancers and other women in and outside of clubs. Just a few examples include:</p> <ul style="list-style-type: none"> • Frequent assault by management, owners and other staff even at ‘top’ chains • Rape by security guard on premises • Management coercing lap dancers to provide sex acts or sex. This is often the only way often desperate women can keep their jobs or get the best shifts • Half naked, intoxicated dancer dumped on street • Gang rape of female visitor led by management |
| References | <ul style="list-style-type: none"> • Abuse by Management, owners & staff |
| | 2.4 Substance Abuse |
| | <p>Excessive drug and alcohol consumption by lap dancers and punters alike goes hand-in-hand with the strip industry. It could be seen as its <i>modus operandi</i> because intoxicated punters freely part with large sums of cash. However, allowing an intoxicated individual to buy a service or item is illegal.</p> <p>SECTION 3: Details some of the ways clubs circumvent the regulations created to try and prevent punters experiencing substance abuse and fraud</p> |
| References | <ul style="list-style-type: none"> • Substance Abuse in Strip Industry |
| | 2.5 Fraud |

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| | <p>Fraud appears to be the <i>modus operandi</i> of the industry. This is a breach both of licensing conditions and the law. It goes hand-in-hand with the substance abuse which enables this.</p> <p>SECTION 3: Details some of the ways clubs circumvent anti-fraud measures</p> |
| References | <ul style="list-style-type: none"> • Fraud and the strip industry |
| | <p>2.6 Prostitution</p> |
| | <p>Strip clubs feed both the supply and demand for prostitution. Research and testimonies from lap dancers indicate that men in strip club constantly proposition for sex and that a key destination afterwards is the local brothel. These men, who have spent the evening objectifying women and are drunk/high, aroused and sexually entitled can be particularly aggressive towards the women they then buy for sex.</p> <p style="text-align: center;">‘The men from strip clubs were particularly aggressive’ Women in brothel</p> <p>Many lap dancers also enter into prostitution via lap dancing. This is because stripping breaks women’s physical and emotional barriers. And, since it is hard to make money in a strip club, prostitution becomes the main source of income with the strip club essentially serving as the ‘pick up’ point for sex buyers.</p> <p style="text-align: center;">‘Stripping groomed me for further sex work’ Bella</p> <ul style="list-style-type: none"> • Most Lap dancers then start selling sex (Home Office) • 30% Glasgow strip club punters bought sex via strip clubs • Pimps are outside every strip club/strip pub in Camden (Met Police) • Touts (pimps) unstoppable and due to strip clubs (Judge) • Strip club operators organise ‘private parties’ <p style="text-align: center;">‘The lap dancers are the appetizer’ pimp outside Spearmint Rhino</p> |

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| | <p>Many women describe pimps sending ‘their girls’ into strip clubs (or scouting for new ‘girls’ in clubs). Many women state clubs have their own cars that are used to take men to the local brothels which they appear to own or have a business interest in. Men who describe financial fraud and apparent drink spiking also refer to being whisked away in black cabs and waking up in a brothel.</p> <p>Even strip club operators who are deemed clean and ‘on the side’ of the lap dancers, send their lap dancers into ‘the underground industry’ - to private parties in men’s homes. Many of the women working as lap dancers, even at these ‘clean, well run’ clubs will also have profiles on other accounts where they sell sex.</p> <p>Even if men do not buy sex after the strip club, their barriers to sex buying (when they have bought sexual contact at the strip club) are greatly reduced. The high street presence of strip clubs also signals to all, that men buying women sexually is perfectly acceptable – playing its part in normalising sex buying in wider society.</p> <p>When a council licenses a strip club it is directly and indirectly feeding the supply and demand for the wider sex industry. This cannot be mitigated.</p> |
| References | <ul style="list-style-type: none"> • Strip Clubs and Prostitution |
| | <h2>2.7 Vulnerable Women in the Industry</h2> |
| | <p>The multiple abuses experienced by women in the strip industry and the slide into prostitution has to be set against a backdrop of a pool of pre-abused and vulnerable individuals in the industry:</p> <ul style="list-style-type: none"> • One study found 2/3 of lap dancers reported childhood sexual abuse • Another study found 1/3 of lap dancers experienced domestic abuse within just a 6 month time frame <p>Of course it is admiral if councils recognise these vulnerabilities and provide support but the fact that the industry attracts the most vulnerable argues against allowing the strip trade to exist at all.</p> |

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| References | <ul style="list-style-type: none"> • Prior Abuse and Abuse outside the Industry once in Lap Dancing |
| | <h2>2.8 Denial, Dissonance, Trauma Bonding</h2> |
| | <p>Research indicates that women in lap dancing exhibit:</p> <ul style="list-style-type: none"> • Denial • Cognitive dissonance (believing things that at the same time you know are not true) • ‘Higher loyalties’ to the strip club (trauma bonding to their abuser, the industry) • Intense condemnation of those who expose the reality of the industry • Dissociation • Desperation <p>Testimonies from survivors confirm this:</p> <p style="text-align: center;">‘Clubs create a trauma bond with lap dancers’ Cassy</p> <p style="text-align: center;">‘I felt I couldn’t do anything else’ Elena</p> <p>This is also evidenced by the actions of those in the industry (and its supporters):</p> <ul style="list-style-type: none"> • Denying breaches and abuse in the face of hard evidence • Demanding clubs with proven mass fraud and high levels of sexual contact remain open • Abuse, threat and intimidation against those who speak out against the industry (including former lap dancers) • Stating they cannot possibly do anything else other than lap dance or turn to prostitution when councils consider ending stripping at venues <p>These are the traits exhibited in individuals who are not only traumatised but are experiencing ongoing abuse.</p> |
| References | <ul style="list-style-type: none"> • What Industry Supporters say |

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| | <ul style="list-style-type: none"> • Denial in the Industry • What Survivors say |
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3 Regulation is Meaningless

Councils often create numerous measures in an attempt to regulate the strip industry. These are mostly 'subjective' and cannot be objectively or independently assessed - in effect rendering them meaningless. They rely on statements of compliance by club owners, staff and patrons with a clearly vested interest to maintain the *status quo*. Or lap dancers who often state they are desperate and are likely to be experiencing denial, dissociation and trauma bonding. Clearly such assurances should never be taken as meaningful evidence of compliance and doing so would not be ensuring adequate safeguarding or be legally compliant.

A few regulatory measures are objective and can, in theory, be independently assessed (such as CCTV or council inspections). Here we explain how even these measures are routinely circumvented industry-wide, rendering these too meaningless.

So, in effect, councils are unable to regulate strip clubs and, worse, have no means whatsoever of knowing what is really taking place in the venues they license. Given the industry norms, it is clear there is immense pressure within the industry to breach any and all regulation.

Councils are putting the women in clubs (and in wider society) at serious risk by issuing strip clubs licenses.

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| | <h3>3.7 Statements of Support/Compliance</h3> |
| | <p>Statements from those with a vested interest in the industry (eg with income to protect) clearly cannot be taken at face value. Doing so could also put the council at risk of breaching the PSED and keeping vulnerable women trapped in a very bad, often dangerous, situation:</p> |

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| | <ul style="list-style-type: none"> - Women in the industry frequently testify that they are desperate for the club to remain open and do not feel they can do any other form of work other than turn to prostitution. - Survivors and whistle blowers testify that lap dancers are often threatened or coerced by management to write statements in support of clubs. - Anyone who speaks out against the industry faces a campaign of abuse – from bricks thrown through windows, cyber stalking or being taken to court. This abuse is particularly vitriolic against those who can do the most damage - women from the strip industry who are prepared to whistle blow. - Many lap dancers operate under denial, ‘higher loyalties’ to the club (trauma bonding) and cognitive dissonance (believing things which at the same time you know are not true). This is a coping mechanism. This is shown through research, testimonials and the actions of women in the industry [See Section 2.8] - This was very clearly evidenced when nearly 100 lap dancers and other staff from Sheffield Spearmint Rhino and other clubs wrote statements of support for this club in 2019, many stating it was a ‘professional’, ‘well run’, ‘safe’ environment. This was after over 200 breaches including extreme sexual contact had been verified. - Statements from other staff, club operators or customers equally cannot be taken as reliable evidence. <p>Thus, statements of support from strip club operators are staff are not only unreliable but cause further harm by women having to yet again re-affirm a false reality, sometimes under coercion.</p> |
| References | <ul style="list-style-type: none"> • Examples of workers and supporters extreme defence of the Industry • Campaigns of threat and intimidation against whistle blowers |

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| | <p>3.8 Codes of Conduct</p> |
| | <p>Codes of conduct, no matter how well promoted or explained to customers, staff or lap dancers, serve as nothing more than a tick box exercise. A catalogue of incidences across the industry and statements from numerous whistle blowers confirm that ‘the rules are there to be broken’. The real rules are: ‘provide as much sexual contact as is expected/needed’.</p> <p>Relying on the fact that codes exist or claims that they are explained to all and adhered to cannot be seen as compliance with equality or safety requirements or, often, the law.</p> |
| | <p>3.9 Staff Training</p> |
| | <p>Training of dancers/security and other staff cannot be seen as a meaningful regulatory measure. For dancers, codes are frequently not provided (according to testimonies from former dancers and whistle blowers).</p> <p>Further, councils cannot possibly know what training is provided or its impact as their only means of ascertaining this is through statements from clubs and staff – which are unreliable.</p> |
| | <p>3.10 Dancer Contracts</p> |
| | <p>Contracts clearly serve as nothing more than a tick box exercise.</p> <p>In addition, Councils cannot possibly know if they have been received (or understood, given the large number of foreign nationals in the industry). Many dancers appear unaware of the most basic aspects of their contracts such as the fact they are self employed. Councils only means of ascertaining contracts exist, are understood or complied with is through statements from club and staff – which are unreliable.</p> |
| | <p>3.5 Incident Logs</p> |

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| | <p>These serve as nothing more than a tick box exercise and provide no meaningful protection. The council has means to ascertain if they are reliable, unless by cross-referencing with incidences that may (but often may not) be caught on club CCTV.</p> <p>These logs can be so poor that some clubs record nothing even in the event of police being called to the venue (as witnessed in clubs such as Red Rooms and Secrets, Camden).</p> <p>Further, lap dancers frequently testify that security and management are some of their main harassers and abusers (ranging from verbal, physical and sexual abuse up to rape). [See Section 2.3]</p> <p>Clearly strip clubs and their staff have a highly vested interest to make sure abuse remains buried for fear of a license being withdrawn.</p> |
| | <p>3.6 Pre-announced Council Inspections</p> |
| | <p>Some councils, such as Camden, carry out <i>pre-announced</i> council inspections of strip clubs. Sometimes this is the <i>only</i> check carried out in a club throughout its annual licensing period.</p> <p>It is self-evident why this is meaningless and in effect serves as a blatant ‘box ticking’ exercise to ensure clubs are given a clean bill of health and licenses are renewed. In effect this actually serves to enable the abuse within strip clubs and could be seen as an anti-PSED measure.</p> |
| | <p>3.7 ‘Unannounced’ Council Inspections</p> |
| | <p>Typically councils carry out unannounced visits to strip clubs. However, a large body of evidence and testimonies from lap dancers indicates these are not meaningful and does nothing more than give a false sense of compliance. Indeed, citing these as evidence of compliance could be argued as a breach of the PSED as a readily circumvented, ‘fake’ regulatory measure.</p> |

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| | <p>Unannounced inspections are meaningless because council inspectors (often accompanied by police, immigration and others) can clearly be seen walking towards the club by the security guards outside. These guards immediately radio through to the club which goes into ‘lock down’ by the time the inspection team get through the door – all touching and grinding has come to an immediate halt.</p> <ul style="list-style-type: none"> - Whistle blowers testify to this exact mechanism, also stating: ‘clubs always know when council inspections are happening’ - A Metropolitan police officer has also stated (to Not Buying It) that they believe unannounced visits are pointless. - Numerous clubs that routinely pass their council checks have been shown to provide copious levels of sexual contact when undercover investigations have been carried out (this includes the most ‘respectable’ clubs such as The Windmill Theatre and Spearmint Rhino chain) |
| References | <ul style="list-style-type: none"> • Sexual Contact on Undercover Inspections • The ‘Well Regulated’ Myth |
| | 3.8 CCTV Randomised Time Checks |
| | <p>In theory, regular checks of CCTV at random time frames should go some way in detecting/preventing sexual contact and potentially some assaults.</p> <p>However, in reality this becomes a tick box exercise, in effect serving as nothing more a whitewashing exercise. Relying on this could again be seen as enabling breaches of SEV regulations and the PSED:</p> <p>Strip club CCTV cameras are operating in dark rooms where they will always be numerous blind spots. They are typically of very low quality (one woman has testified how club CCTV recording of her rape by a security guard was of such poor quality that he escaped conviction).</p> |

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| | <p>Lap dancers also state they work together, one obscuring the camera while sexual contact is provided by the other.</p> <p>Clubs also use CCTV-free areas, such as nooks and crannies, to enable sexual contact. Lap dancers have testified that innocent-looking ‘nooks’ in private areas/rooms that cannot be seen on CCTV become ‘VIP’ areas for sexual contact.</p> <p>More than one whistle blower has testified that entire floors (deemed ‘closed’ by the council) are actually used for ‘VIP’ dances (sexual contact/sex acts).</p> <p>In addition the question must also be posed ‘How easy is it to see a breach when the regulations typically allow women to get as close as they possibly can to a customer without touching?’</p> <p>‘Clean’ CCTV, rather than indicating genuine compliance could clearly be giving a false positive.</p> <p>CCTV also does not (and cannot easily) record audio. Women in the industry describe routine verbal abuse, threats and harassment. The use of highly sexualised language and offers of prostitution by dancers themselves has been reported in numerous undercover visits. Such propositioning is not just a breach of licensing terms, it puts women in (and outside of) the club at even greater risk of harassment, assault or engaging in prostitution.</p> |
| References | <ul style="list-style-type: none"> • Sexual Contact on Undercover Inspections |
| | <h3>3.9 Undercover Inspections</h3> |
| | <p>One possible way to genuinely observe <i>some</i> breaches - such as sexual contact by lap dancers - is via undercover visits by independent, trained inspectors (not hired by, or known to, the club).</p> |

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| | <p>These have revealed even the most respected and ‘best run’ clubs in the country (from the Windmill Theatre to Spearmint Rhino) provide copious sexual contact and prostitution, often with pimps outside.</p> <p>However, such inspections are unlikely to reveal anything other than a narrow band of breaches – such as sexual contact by lap dancers. They are unlikely to be able to observe sexual contact in other performances and even less likely to observe verbal/physical/sexual harassment or assault of lap dances by customers or staff.</p> <p>In addition, undercover investigators can relatively easily be detected by lap dancers and other staff. Given that most clubs only have a small number of regular visitors, this becomes increasingly likely.</p> <p>Some clubs have turned to hiring their own ‘independent inspectors’. In the case of Spearmint Rhino Sheffield, the chain’s VIP knew when these independent inspections were being made. Clearly this cannot be taken as any indication of compliance and should not even be aired as meaningful information at licensing hearings.</p> <p>So, rather than indicating genuine compliance, clean visits by investigators could instead be giving a ‘false positive’.</p> <p>It should also be noted that even after considerable breaches (including extreme sexual contact, prostituting or pimping) license are frequently not revoked or refused. Instead ‘more conditions’ are put in place – none of which can be monitored or enforced. Doing this, we would argue, is again a breach of the PSED.</p> |
| References | <ul style="list-style-type: none"> • Sexual Contact exposed on Undercover Visits |
| | <h3>3.10 Whistle Blower Hotline</h3> |
| | <p>In theory a whistle blower hotline could be one way, and perhaps the only way, to detect if dancers are being mistreated. This must be well advertised in large posters in the club’s changing rooms and should be reiterated to lap dancers on every visit by licensing officers.</p> |

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| | <p>However, the effectiveness of a Hotline depends on whether dancers trust it to be truly confidential or indeed independent (given most, understandably, have little or no faith in the authorities).</p> <p>It also relies on the idea that dancers will complain, even if they do believe it is independent and confidential. Women in the industry are routinely threatened and intimidated to ensure their silence. They are also typically in denial, in a state of cognitive dissonance, display higher loyalties to the club and are often desperate for a club not to shut, despite all the abuse associated with it.</p> <p>It also relies on dancers feeling they are being abused and exploited, which many will not whilst in the industry – particularly as many have already experienced abuse outside of the strip club environment. So such mistreatment seems normal.</p> <p>Hence a lack of uptake cannot possibly be used to guarantee there are not serious issues in a strip club.</p> <p>Even if there is uptake, this would remain confidential and the council could not be told of what is happening in the clubs they license</p> <p>The remit of the Hotline line must also be very clear - it is for those with problems with the club – or it will be sabotaged by club supporters. An open forum will be meaningless, no matter how well intended as exemplified by the Lap Dancer Forum set up by Camden council. This is then used to promote the message that there are no major issues and to lobby for the club to remain open ‘in the best interests of the dancers’.</p> |
| | <p>Security to Wear Bodycam</p> |
| | <p>After several reports of GBH at a strip club in London (Secrets, Camden) police called for security to wear bodycams.</p> <p>This could go some way to encourage security to behave appropriately if serious incidences arise. But it could equally deter security from intervening at all (as was also noted at Secrets) or from clubs reporting incidences to the police (as was noted at this club and others, such as Red Rooms, Camden – even after a potentially fatal stabbing).</p> |

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| | <p>It will do nothing to prevent the provision of sexual contact and harassment and assault of lap dances in private areas. Many survivors of the industry testify that management and security are complacent or even complicit in the sexual contact dancers provide and the abuse they experience.</p> <p>Some dancers bribe security to 'turn a blind eye' to the sexual contact (and possible assault) taking place in private areas, as this is the only way lap dancers can earn meaningful sums of money.</p> <p>Other dancers testify that women provide sex acts or sex to management in order to keep their jobs or gain the best shifts.</p> <p>Given the recent reports of widespread mis use of bodycam by the police, it seems particularly unwise for men working at strip clubs to be issued with similar equipment.</p> |
| | <p style="text-align: center;">Drug and Alcohol Abuse</p> |
| | <p>By Punters:</p> <p>Excessive drug and alcohol consumption by punters goes hand-in-hand with the strip industry. It could be seen as its <i>modus operandi</i> because intoxicated punters freely part with large sums of cash.</p> <p>This is not only illegal in its own right but is of concern when considering women and girls' safety. Intoxicated (and sexually aroused) customers means women both inside and outside strip clubs are at even greater risk of harassment and assault.</p> <p>By Lap Dancers:</p> <p>Excessive consumption of alcohol/drugs by lap dancers is also normal in the industry. This is partly due to boredom, the lifestyle and because this enables the dissociation and dissonance necessary for the job. Substance abuse also places dancers at more risk of abuse, both inside and outside the club (during breaks or when they leave their shift).</p> |

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| | <p>In addition, allowing intoxicated customers to continue to drink or buy goods and services is unlawful yet club culture puts lap dancers in the position where they are instrumental in this, acting as the main persuasive force on punters.</p> <p>Drugs, such as cocaine, could be detected by routine swabs (toilets, bar areas etc) on unannounced council spot checks or during undercover visits.</p> <p>However, strip clubs will argue that drugs are prevalent in many other venues such as night clubs and that they should not be singled out. It is dubious how effective this will be in deterring drug use or in taking any legal measures to prevent it (such as club closure after repeat offending).</p> <p>Clubs could also circumvent this by much more regular wiping down of bar areas/toilets etc. Or they could take ‘on the spot’ action when they are alerted to a club inspection.</p> <p>Because the intoxication of customers is how strip clubs make money, clubs will continually find ways to circumvent any attempts to detect or prevent this.</p> |
| | <p>Fraud</p> |
| | <p>Fraud is standard in the strip industry according to lap dancers and numerous press, police and trading standards reports. In fact, it could be seen as the <i>modus operandi</i> of the industry. This includes taking payment from intoxicated customers, drink spiking and potentially money laundering. These are breaches of licensing conditions and the law. Since this is how the industry appears to operate, it also means there is considerable incentive circumvent all anti-fraud measures.</p> <p style="text-align: center;">‘Financial fraud is the norm’</p> <p>Fraud is carried out by fairly standard techniques across clubs: lap dancers keep a (drunk and often high) customer ‘distracted’ whilst extra ‘0’s are added to his bill on the credit card machine. The customer doesn’t notice, enters his pin and the transaction is authorised.</p> |

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| | <p>Alternatively (drunk and often high) customers are billed excessive amounts for drinks and dances which they are in no fit state to challenge, or even recognise as inaccurate.</p> <p>Lap dancers are integral to this fraud – distracting the customer, plying him with drugs and alcohol. Thus making them an accessory. This is again held over lap dancers head by management as a way to keep them compliant.</p> <p>It is notable that many men who have been defrauded in this manner describe ‘Rohypnol-like symptoms’ – with no recollection of what happened at the club. Drink spiking has also been widely reported in the industry.</p> <p>In Camden, police/trading standards have recommended ‘payments to only be made at a cash desk’, ‘transactions to be recorded on audio as well as on CCTV’, ‘lap dancers not to be present to distract when payments are made’. However, these measures seem sorely lacking. Often the fraud will not be detectable. Often drugged men will not appear intoxicated (police have frequently noted that many men who claim fraud ‘appeared fully cogent’ at the time of payment).</p> <p>It must also be noted that, since financial fraud is an important income stream, the industry will work very hard to circumnavigate any measures put in place to prevent this.</p> |
| References | <ul style="list-style-type: none"> • Strip Clubs and Fraud |
| | <p>Council Training</p> |
| | <p>Councillors and council officers cannot possibly deal with strip clubs in an appropriate manner when they do not know the harms involved, how it really operates, SEV or PSED legislation.</p> <p>It should be noted that most understanding of the industry and its legislation comes from those with a vested interest to maintain it. This includes strip club operators and staff. Even the legal experts who typically train councils tend to be the same experts who represent strip club operators every year – making vast sums of money in the process.</p> |

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| | <p>One way to help ensure appropriate training, and counter the vast amounts of misinformation, is through regular training of licensing officers and licensing committees.</p> <p>However, this must be carried out by survivors and survivor advocates <i>not</i> those in the industry, industry advocates or anyone who will gain from keeping the industry open.</p> <p>In addition, the fact that staff are trained does not mean that they will act on the information they are given. Experience has shown that even after years of interactions with objectors (including court cases), councils still do not enact the most fundamental principle of SEV legislation (which gives them extraordinary powers to stop issuing striping licenses to venues).</p> |
| | <p>Abuse in the Vicinity</p> |
| | <p>Harassment and assault of women outside strip clubs by punters and even club security are common place. This can also include pimps – who go hand-in-hand with much of the industry and are frequently seen outside strip clubs. (According to the Metropolitan police, there are pimps outside every one of Camden’s many strip clubs/strip pubs).</p> <p>Theoretically, this can be mitigated in the immediate vicinity through excellent exterior CCTV, security guards who carry out their jobs properly and the very public encouragement of reporting to the police/authorities.</p> <p>However, this relies on reliable reporting as many who are harmed will not report. CCTV needs to be linked to the authorities for monitoring, not the club. It also means abuse is likely to simply be displaced elsewhere, where there are fewer preventative measures in place.</p> |
| | <p>Support for Lap Dancers</p> |
| | <p>All councils should ensure support for lap dancers - including exit support - as a matter of course.</p> |

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| | <p>But this must be provided by an appropriate, neutral, independent and properly resourced provider. This means a service which understands the harm of the industry and genuinely seeks to support women from the strip trade and wider sex industry, including with exiting. It cannot be provided by sex industry advocates as this only serves to keep women trapped even longer in the industry, refusing to recognise the considerable harms experienced.</p> <p>It should be made very clear to all women in the club that support is available – eg large posters in changing rooms that must always be on display and through supportive exchanges with licensing officers on their visits to clubs. The support provider should also be able to visit the club regularly to reach out to women.</p> |
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4. Closing Strip Clubs is *Not* Anti Equalities

It is often suggested by the sex trade lobby that closing strip clubs is extremely harmful and actually anti-equalities because of the adverse effect on female workers. Here we look at the main myths around this and demonstrate how the exact opposite is the case.

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| | <h3>4.1 The ‘Putting Women out of Work’ Myth</h3> |
| | <p>It is often argued that ‘closing strip clubs’ will ‘put women out of work’ – since most of those working in strip clubs are women this is therefore a form of sex discrimination.</p> <p>This is incorrect for a number of reasons:</p> <ul style="list-style-type: none"> - It is <i>strip clubs</i> that keep women out of safe (and often even paid) work as shown clearly demonstrated throughout this report. - Venues that provide lap dancing are not being shut down. All that is happening is the license for sexual entertainment is being withdrawn. They will still operate but as normal clubs, bars, cafés, restaurants etc. Many women formerly working as lap |

dancers will not even have to relocate but can work in exactly the same venue, just in a different (safer) role.

- Industry supporters frequently suggest 40 or more women will be 'put out of work' if a venue no longer provides lap dancing. It should be noted that this is only referring to women working part time in stripping. Many have other jobs (some report they are successful businesswomen), study or have caring responsibilities. Hence this figure is misleading in suggesting 40 full time workers will suddenly be jobless.
- Some women in the industry state there is no other work that suits their life style - giving them the necessary choice or flexibility. But it should be pointed out there is no real choice or flexibility in lap dancing. Clubs dictate exactly which nights you work and monitor you closely whilst at work (including frequent fines for any 'digressions'). And how flexible is it to work all night in a physically and emotionally exhausting environment and then return to your caring responsibilities, studies or other job the next day (constantly shifting from day to night time living)?
- It should be noted that the 'putting women out of work' argument is made even in booming economies in large cities with significant alternative employment opportunities. This includes post Covid when entire sectors (often closely related to lap dancing, such as hospitality or retail) are crying out for workers and whose workers are then relatively well paid. Women formerly in lap dancing will invariably be young and attractive with excellent interpersonal skills, making it likely they can rapidly progress in other workplaces.
- Women who working in strip clubs invariably describe themselves as highly empowered and not wanting to be victimised – suggesting they are highly capable of other work. Isn't it victimising and patronising to suggest otherwise?
- **It is imperative that councils ensure women are supported into alternative, safe employment. This must go hand-in-hand with the independent support they should already be providing to women in clubs**
- **When this is provided it will invariably become clear that the desperation shown by so many in the industry is due to the high levels of abuse within it, the fact that many have entered into prostitution and the resultant poor mental health this has led to.**

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| | <p>If councils give undue weight to the claim that ‘ending a strip club license will put women out of work’ they are likely to be breaching the PSED, particularly when the opposite is true: it is the strip industry that keeps women out of safe, and often even paid, work.</p> |
| References | <ul style="list-style-type: none"> • The ‘Putting Women out of Work’ Myth • The ‘Flexible, healthy work’ Myth |
| | <h2 style="margin: 0;">4.2 The ‘Going Underground’ Myth</h2> |
| | <p>It is frequently stated that withdrawing a strip club license from a venue will ‘drive the industry underground’. This has variously referred to ‘underground strip clubs’, women stripping at ‘less safe private parties’ or ‘women entering prostitution’.</p> <p>Here we look at each of these arguments, however it should be remembered:</p> <p style="text-align: center;">The strip industry itself operates like an underground industry, with no meaningful regulation, mass fraud, high levels of abuse, sexual contact and ultimately prostitution.</p> <p>Underground Strip Clubs:</p> <ul style="list-style-type: none"> - There is no evidence for this, including in towns and cities where the licensed strip industry has been drastically cut such as Bristol (cut from 5 to 2 strip clubs); Blackpool (cut from 12 to 4 clubs) or Tower Hamlets (cut from 10 to 4 clubs). <p>‘Private Parties’:</p> <p>It should be noted that ‘private parties’ is invariably a euphemism for ‘prostitution’.</p> <ul style="list-style-type: none"> - It is the licensed strip industry that directly feeds such ‘private parties’ (whether for prostitution or stripping and other ‘non prostitution’ entertainment) - Survivors testify that club operators organise ‘private parties’. When the club shuts so do the private parties |

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| | <ul style="list-style-type: none"> - Some club operators very openly advertise ‘private parties in men’s homes’ with women as sexual entertainment. This includes the Bristol strip club operator, whilst at the same time arguing that ‘women will work at private parties’ if the strip clubs shut. <p>Prostitution:</p> <p>It is <i>strip clubs</i> that fuel both the supply and demand of prostitution:</p> <ul style="list-style-type: none"> - A pimp outside one London club is recorded for stating the lap dancers are ‘the appetizer’ This perfectly describes the situation. - A Home Officer study found most lap dancers then started selling sex. The longer a woman was in the strip industry the more likely this was. - Another study found 40% of lap dancers interviewed were selling sex. 90% only started after they entered the strip industry. - In terms of fuelling sex buying, one study found 30% of Scottish strip club punters had bought sex via strip clubs - Another study found 50% of Glaswegian strip club customers stated they had bought and had sex in the strip club itself <p>The claim that closing strip clubs drives ‘an underground industry’ have no evidence in support.</p> <p>If councils give undue weight to this opinion the are likely to be breaching the PSED, particularly when the opposite is true : it is the strip industry that drives the ‘underground industry’.</p> |
| References | <ul style="list-style-type: none"> • The ‘Going Underground’ Myth • Strip Clubs and Prostitution |
| | <p>4.3 Breaching ‘Free Choice/Freedom of Expression’ Myth</p> |

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| | <p>it is sometimes argued that women have the right to choose stripping and it is a breach of their human rights and freedom of expression not to enable this by issuing stripping licenses. This argument is debunked here.</p> |
| References | <ul style="list-style-type: none">• ‘The Free Choice’ Myth |