



Background of White Ribbon Scotland

The White Ribbon Campaign is an international movement to engage men in tackling violence against women, which began in Canada in 1991. The movement now exists in over 60 countries across the world and an informal steering group was formed in Scotland in 2006 to oversee White Ribbon campaigning, with White Ribbon Scotland registered as a Scottish Charity in 2010. We work with non-perpetrating men to tackle violence against women. We stress that although not all men are perpetrators, we live in a society where women do not have the same equality as men and, as a consequence of this inequality, are victims of gendered violence. The White Ribbon Scotland campaign seeks to engage with men and boys to tackle violence against women by challenging the gender inequality which underpins it. Since 2010, White Ribbon Scotland has campaigned nationally and locally, delivering training in partnership with local authorities, statutory agencies and in schools to raise awareness of the prevalence and nature of men's violence against women, challenge sexist attitudes, reconsider men's own behaviours and promote healthy masculinity. Over 2200 members of the public have taken the online pledge to never commit, condone or remain silent about violence against women.

Summary on our position

Sexual Entertainment Venues (SEVs) should not exist in a Scotland free of violence against women, and regulation on behalf of the state condones their existence. Lap dancing is a form of commercial sexual exploitation and therefore a form of violence against women. This is recognised by both the White Ribbon Scotland Campaign and Scottish Government therefore SEVs, which predominantly host lap-dancing and related activities, provide a forum for the perpetration of violence against women first and foremost. Furthermore the prevalence of such establishments are a result of gender inequality, the root cause of violence against women. SEVs normalise and legitimise the objectification and commodification of women, therefore perpetuating gender inequality.

If SEVs are to exist then regulation would be a means of harm reduction. We are therefore in favour of a new system which regulates SEVs, rather than the current system which consider sexual entertainment as an aspect of alcohol licensing.

Q1: Should sexual entertainment and the sale of alcohol be licensed separately? If so, what impact, if any, would a parallel regime for sexual entertainment venues have on alcohol licensing?

Yes, there should be separate licenses. Currently parallel licenses exist elsewhere, for example a cinema require license to show films (Cinemas Act 1985) and a license to sell alcohol (2005 Act). If there is to be licensing of sexual entertainment venues it is important that specific safeguards are to be maintained as a condition of the license.



Q2: Do you agree that sexual entertainment premises should be licensed separately from other forms of public entertainment?

Yes. By licensing SEVs in the same way as cafes, cinemas or restaurants etc scant consideration is given to the human harm involved. By using current licensing procedures it would contribute to the normalisation of commercial sexual exploitation which contributes to the concept that women are objects to be bought and sold. A clear distinction in licensing policy is necessary to fully take into account the potential harm caused to those exploited, and would allow for mechanisms which could analyse and subsequently challenge demand for SEVs.

Q3: Is the definition of an audience as 'an audience of one' appropriate?

Yes, if it refers to a performance where only one person is present. This would be the case with private dances, performed in a booth or other private place within the premises. In such a situation it seems difficult to ensure the immediate safety of women in SEVs, and also creates an opportunity where pressure can be exerted for a woman to provide sexual services.

Q4: Is the definition of sexual entertainment sufficiently clear? Are additional measures required to protect the position of artistic performances including, for example, exotic dancing?

Specific reference should be made to 'nudity or partial nudity'. There have been cases where venues have exploited the language to avoid licensing conditions by encouraging women to wear see-through clothing, or revealing clothing such as g-strings.

There are no additional measures required to protect artistic performances.

Q5: Are there any other venues which should be exempt?

No, there are no other venues which should be exempt.

Q6: Is it appropriate that premises that are used for sexual entertainment on less than three occasions per year should be exempt from licensing?

No. Sexual entertainment should require a license before it can take place, regardless of the main purpose of the venue.

Q7: Is it appropriate that local authorities be allowed to decide that there should be no sexual entertainment venues in their area?

Yes. Considering a purpose of the proposed regulation would be to uphold local authorities' right to exercise control and to serve their communities, there should be no limits in this regard. Having powers to set the limit of SEVs at 'zero' would be the only way that Local



Authorities could prevent their existence, and in doing so prevent this form of violence against women from taking place within their areas.

Q8: Does the approach detailed above offer an adequate regulatory regime to provide control of sexual entertainment and provide local licensing authorities with the powers to determine the nature of the activities they wish to allow in their areas?

No. Local authorities should have the power to set the amount of venues to be licensed and to determine the activities that take place if a venue is granted a license. This regulatory framework does allow for this; however it is unlikely that sexual entertainment can be controlled purely through regulation. The existence of such establishments create an atmosphere which depicts women in a negative way and women who live or work near lap dancing clubs have reported harassment and verbal abuse by men who visit the clubs.

Q9: Are there any other issues which Scottish Ministers should take into account in considering possible legislation to provide for the licensing of sexual entertainment venues?

Yes. In relation to our position stated above the licensing of sexual entertainment venues contradicts the commitments within the national violence against women framework, *Safer Lives: Changed Lives* (2009). The foreword states that 'We must continue to move forward and to take whatever action is necessary to achieve our ultimate aim; to create a Scotland in which violence against women no longer exists.' Through regulating this 'industry' the state is legitimizing commercial sexual exploitation, and with it a prevalent form of violence against women.

In relation to the work of the White Ribbon Scotland Campaign it is crucial that men understand gender inequality to be a root cause of violence against women. There can be resistance when presenting commercial sexual exploitation as 'violence against women' due to the disparity between physical violence and exploitation. Both violence and exploitation are forms of abuse, whether committed by the individual or by the state, and this should certainly be at the forefront of any discussion of licensing of sexual entertainment venues.