

Response from Spittal Street Womens Clinic on Section 68 (Licensing of sexual entertainment venues) of the Air weapons and Licensing (Scotland) Bill

Spittal Street Womens Clinic is a joint initiative between NHS Lothian's Harm Reduction Team, Chalmers Centre and Sacro's Another Way service. We offer a range of sexual health services, health promotion and direct referrals to other related services such as Sacro's Another Way to women involved in the commercial sex industry and/or women who use substances.

As an NHS Organisation we hope the Bill on sexual entertainment will safeguard and improve the physical and psychological health of women providing sexual entertainment and have gender based violence prevention as a key objective.

We have read the relevant section of the Bill and have some general suggestions and more specific comments as outlined below.

1. We feel 'sexual entertainment' requires further definition.
2. As well as the number of sexual entertainment venues we believe the Bill should address the density of venues within a city. Having several sexual entertainment venues within close proximity encourages disrespectful behaviour and gender based violence to women both within and out with the venues.
3. Regular inspections of premises by environmental health, police and NHS should be part of the licence agreement and included in the Bill.
4. Could the licence include a requirement of the owners to allow the NHS and associated services access to the venues? Social welfare, housing, and mental health are common problems in women involved in sexual entertainment and we believe services such as ours could improve the health and well being of these women.
5. The Bill could include strict guidance on how dances take place to ensure no contact. Currently we feel it is inadequate to ensure the safety of women.
6. The Bill does not mention payment that women receive and any regulation regarding this.

With regards to specific points in the Bill;

7. We have concerns regarding the regulation of point 45A (9) (no sexual entertainment licence required if entertainment takes place 3 times or less per year). We feel that 'allowing' 3 sexual entertainment events to take place a year may lead to abuse of the bill and that all public sexual entertainment episodes should have to have a licence.
8. With regards to section 45B (1A). We feel that allowing under 18s to work at or be permitted to sexual entertainment venues is not acceptable. Although no sexual activity would be taking place we feel that there would be opportunity for exploitation and coercion of potentially vulnerable adolescents and cannot see a benefit in allowing under 18s into such venues in the first place.